



May 13, 2011

Jeffrey Zients
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Re: Executive Order 13571
Streamlining Service Delivery and Improving Customer Service

Dear Mr. Zients:

OMB Watch would like to comment on Executive Order 13571, “Streamlining Service Delivery and Improving Customer Service.” As a nonprofit organization dedicated to open government, accountability, and citizen participation since 1983, OMB Watch welcomes the order’s steps to improve agencies’ customer service and to make service delivery more efficient.

To contribute to the successful realization of the order’s goals, OMB Watch offers the following comments:

- Informing and engaging the public is a critical government service for many agencies, and improving those services should properly be considered within the scope of the order;
- Successfully soliciting meaningful customer feedback requires embracing the principles of participation and collaboration embodied in President Obama’s memorandum on transparency and open government; and
- Agencies should be mindful that, although they may use customer service considerations to improve their interactions with regulated entities, their true customers are always the American people and not the regulated community.

Information and Engagement as a Government Service

Customer service in government doesn’t always look like filling out a form or receiving a payment. A major function of government is providing information to the public, both about the actions of government itself – such as how their tax dollars are being spent – as well as issues that affect the well-being of the American people, such as toxic chemicals in their communities. Government exercises this function by providing a variety of government services, including websites, publications, datasets, media campaigns, public service announcements, public

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warning systems, and community outreach. The economic and social impact is immense and difficult to quantify; for instance, information delivered by these services is often redistributed by non-governmental entities such as the news media, public interest groups, and libraries. Their users may not even be aware that the information originated from a government service.

We appreciate that the order acknowledges the importance of information delivery by calling for actions for “improving the design and management of agency websites providing services or information to the public.” OMB Watch has long advocated that government should use the Internet to communicate with the public. Effectively delivering information online must include a commitment to make government websites as robust and as user-friendly as possible, and to regularly update them to add information and address customer needs.

In recent years, the federal government has made steps to improve its online communications, including launching a number of new and redesigned websites and increasing the use of visitor surveys. We support continued efforts to improve government websites, such as enhancing accessibility for disabled users, improving compliance with web standards, and ensuring government websites are accessible in a variety of browsers, including mobile devices.

However, improving existing websites is only one part of the puzzle. OMB’s guidance on implementing the order should direct agencies to review their public information and outreach services, including but not limited to websites. The review should examine these services from a customer perspective, look for gaps in these services, and consider adopting best practices and innovative technologies to improve these services. In reviewing their information services, agencies should keep in mind the principles of President Obama’s memorandum on Transparency and Open Government – ensuring public trust and strengthening democracy by increasing transparency, participation, and collaboration. The reviews should also consider these services in light of agency missions and the important national purposes that these information services can support, including protecting public safety and the environment.

Successfully Soliciting and Using Customer Feedback

Paramount to improving customer service is understanding the customer’s perspective. President Obama’s Open Government Directive set the stage well for increasing participation and collaboration to allow “customer” feedback to guide changes to agency activities.

As the government seeks greater input about customer satisfaction, several issues should be kept in consideration. First and foremost is the question of resources. Feedback processes do require resources to be successfully executed, which agencies can be reluctant to provide. However, cost-effective participation processes should be viewed as an investment, as they can yield cost savings and improved services in the longer term. For instance, soliciting customer feedback before designing a form can help produce a better form, which reduces the staff resources necessary to respond to customer questions later.

Another key consideration is the ease of input. Often “customers” will not provide any feedback unless the mechanism for gathering the information is easy and ingrained into the service itself. For instance, many businesses have instituted regular surveys at the end of every customer call to gather information on the level of satisfaction and identify any problems. Agencies are going to have to develop low-burden mechanisms that similarly dovetail with the services they provide, whatever they might be.

Finally, to be sustainable, customers must perceive that their feedback can have an impact. Agencies must take the time to respond to customers and explain how the agency uses their input. Agencies should also consider offering mechanisms where the public is able to access the feedback provided to agencies. The General Services Administration offers several such services for agencies to use, such as IdeaScale and UserVoice. These services turn customer feedback into a conversation, where customers can respond to one another’s ideas, generating an increased level of participation and creating a sense of ownership.

Regulated Entities are not the “Customer”

Reviewing agency activities through a customer service perspective can reveal many ways to improve efficiency, timeliness, accuracy, elimination of unnecessary work, and much more. However, there are also potential risks associated with inappropriately using such a perspective, especially for regulatory agencies. OMB Watch fully supports agencies’ use of a customer service framework to improve their regulatory activities but cautions agencies to always remember that the companies and individuals they regulate are not their real customers. Agencies’ true customers are the American public. Even agencies that have limited direct interaction with the public are tasked with serving the public’s best interest. It is upon the public’s behalf that agencies oversee commerce, the environment, transportation, education, and everything else.

Recent disasters such as the BP Deepwater Horizon oil spill have brought into question the sometimes overly close relationship that can develop between regulators and the regulated. Regulators have a responsibility to enforce the laws that protect consumers, workers, and the environment. Approaching their duties with a customer service perspective should not encourage agencies to abdicate this responsibility in order to placate regulated entities.

It is appropriate to review regulatory activities with an eye to reducing unnecessary burdens. In fact, in some circumstances, this can benefit the public as well as the regulated entity. For instance, by collecting required reporting in electronic form rather than on paper, an agency might reduce compliance costs while also being able to make the reported information available to the public in a more timely fashion. In addition, as noted in OMB’s guidance on the Plain Writing Act, improving the clarity of agency communications with regulated entities can increase compliance, ultimately reducing the risks to the American public.

However, the order should not be seen as permission to develop an overly familiar relationship with regulated entities or place too much emphasis on the stated needs of their regulated communities. We urge OMB to include guidance that reminds agencies that the public is the primary customer and cautions agencies from overly identifying the regulated entities as customers.

Thank you for the opportunity to comment on E.O. 13571. We hope you take our recommendations into consideration. If you have questions about our comments or want to discuss the issues further, please feel free to contact us.

Sincerely,



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OMB Watch



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