

**SUPPORTING STATEMENT A**  
**FOR PAPERWORK REDUCTION ACT SUBMISSION**  
**Generic Clearance for Improving DASG's APIs Customer Experience**  
**(CMS-10923; OMB 0938-New)**

**JUSTIFICATION**

**1. Circumstances Making the Collection of Information Necessary**

On September 11, 1993, Executive Order 12862, "Setting Customer Service Standards" was issued. This Executive Order expressed the vision that Federal agencies will put the people first. Executive Order 12862 directs federal agencies to provide services to the public that match or exceed the best services available in the private sector. Section 1(b) of Executive Order 12862 requires government agencies to "survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services." Section 1(e) requires agencies to "survey front-line employees on barriers to, and ideas for, matching the best in business."

On March 30, 2016, the Core Federal Services Council was established. The Council emphasized the need to deliver world-class customer service to the American people. The Council, composed of the major high-volume, high-impact Federal programs that provide transactional services directly to the public, was encouraged "to improve the customer experience by using public and private sector management best practices, such as conducting self-assessments and journey mapping, collecting transactional feedback data, and sharing such data with frontline and other staff."

In March 2018, the President's Management Agenda (PMA) and new Cross-Agency Priority (CAP) Goals were launched. Excellent service was established as a core component of the mission, service, and stewardship model that frames the entire PMA, embedding a customer-focused approach in all of the PMA's initiatives. This model was also included in the 2018 update of the Federal Performance Framework in Circular A-11, ensuring 'excellent service' as a focus in future agency strategic planning efforts. The PMA included a CAP Goal of Improving Customer Experience with Federal Services, with a primary strategy to drive improvements within 25 of the nation's highest-impact programs. This effort is supported by an interagency team and guidance in Circular A-11, which requires the collection of customer feedback data and the increase of the use of industry best practices to conduct customer research.

From 2021-2023, Executive Order 14058, *Transforming Customer Experience and Service Delivery to Rebuild Trust in Government*, Memorandum M-22-10, *Improving Access to Public Benefits Program Through the Paperwork Reduction Act*, and an OIRA Memorandum titled *Strategies for Reducing Administrative Burden in Public Benefit and Service Programs* were issued. The Executive Order and memoranda, taken as a whole, direct agencies to take specific actions to improve customer experience and enhance public participation and community engagement. Furthermore, the President's Management Agenda contains a Priority titled

Delivering Excellent, Equitable, and Secure Federal Services and Customer Experience, which, among other things, seeks to improve the service design, digital products, and customer-experience management of Federal High Impact Service Providers by reducing customer burden, addressing inequities, and streamlining processes.

These Presidential actions and requirements establish an ongoing process of collecting customer insights and using them to improve services. This new request will enable the Centers for Medicare & Medicaid Services' Data Analytics and Systems Group (hereafter "the Agency") to act in accordance with OMB Circular A-11 Section 280, Executive Order 14058, and the OMB memoranda on burden reduction, to ultimately transform the experience of its customers to improve both efficiency and mission delivery and increase accountability by communicating about these efforts with the public.

## **2. Purpose and Use of the Information Collection**

The Agency will collect, analyze, and interpret information gathered through this generic clearance to identify services' accessibility, navigation, and use by customers and make improvements in service delivery based on customer insights gathered through developing an understanding of the user experience interacting with the Government.

For the purposes of this request, "customers" are individuals, businesses, and organizations that interact with a Federal Government agency or program, either directly or via a Federal contractor.

"Service delivery" or "services" refers to the multitude of diverse interactions between a customer and a Federal agency, such as applying for a benefit or loan, receiving a service such as healthcare or small business counseling, requesting a document such as a passport or social security card, complying with a rule or regulation such as filing taxes or declaring goods, using resources such as a park or historical site, or seeking information such as public health or consumer protection notices.

Under this request, two types of activities will be conducted to generate customer insights:

**Customer Research (E.g., User Persona and Journey Map Development via interviews):** A critical first component of understanding the customer experience is to develop customer personas and journey maps. This process enables the Agency to more deeply understand the customer segments they serve and to organize the processes customers interact with throughout their engagement with the Federal entity to accomplish a task or meet a need. To adequately capture the perspective of the customer and the barriers or supports that exist as they navigate these journeys, it is necessary to directly interact with customers rather than relying solely upon the Agency's stated policy of how a process should work or employees' interpretation of how services are delivered. This can occur through various information collection mechanisms that include focus groups, individual intercept interviews at a service site, in-depth individual remote interviews, shadowing a user as they navigate a Federal service and documenting their reactions and frustrations, customer free-response comment cards, or informal small discussion groups.

Regardless of the format, the Agency will apply Human Centered Design (HCD) Discovery methods to generate personas and journey maps, ultimately identifying customer insights. An approach to recruiting participants, resources for preparing and structuring interviews, and a consent form for interviewees can be found at <https://www.gsa.gov/cdnstatic/HCD-Discovery-Guide-Interagency-v12-1.pdf>. This document is also included in the package.

Insights documented, summarized, and presented in customer personas and journey maps can then be shared across the program, the Agency, other Federal, State, and Local government stakeholders, and even with the public to validate and discuss common themes identified. These products can be used as “indicator lights” where more rigorous qualitative and quantitative research can be conducted to improve Federal service delivery.

Publicly shared personas and journey maps will include language that qualifies their use (see question #16), and high-level, non-identifying descriptive statistics of the population(s) interviewed to develop it (ex. “25 Service members that transitioned to civilian employment within the last decade, 14 female, 11 male, 21 enlisted and 4 officers) to ensure that the perspective represented is understood. Quotes or insights will never be associated with an actual individual unless they have signed a release form (see link above for template), and this was included in the specific collection request.

**Customer Feedback Surveys:** Surveys to be considered under this generic clearance will include those surveys modeled on the OMB Circular A-11 CX Feedback survey to improve customer service by collecting feedback at a specific point during a customer journey. This could include attending a CMS-sponsored conference, interacting with the Agency about software code questions for the relevant APIs, or experience with using the data the Agency provides.

Additionally, surveys will be used to assess needs defined by or as a precursor to qualitative research. In the former, themes arising from qualitative research will be tested for sizing purposes to see how widespread the theme or need is. They could also set the foundation for qualitative research by surfacing themes, testing hypotheses, and providing context for a qualitative research undertaking.

Lastly, surveys will be used to identify and qualify potential participants for the Agency. These surveys intend to create participant panels for the Agency to conduct future customer experience research with at a later date.

To develop comparable, government-wide scores that will enable cross-agency or industry benchmarking (when relevant) and a general indication of an agency’s overall customer satisfaction, High Impact Service providers must refer to OMB Circular A-11 Section 280 for required survey question wording and organization.

### **3. Consideration Given to Information Technology**

There are neither legal nor technical obstacles to using technology in these information collection activities. The determination to use technology and which technology to use will be based on the type of information collected and the utility and availability of specific technology to each respondent in a proposed customer research activity or feedback survey. For example, qualitative respondents may be communicated with via email, screened via a Qualtrics survey, and interviewed via Zoom.

#### 4. Duplication of Information

The Agency will work to ensure the streamlining of all customer research and feedback surveys under this clearance. The Agency will also work to reduce existing customer feedback surveys and questions to align with the A-11 Standard CX Feedback survey as part of a coordinated Agency-wide customer program. The information on these surveys will not be duplicated in any other information collection.

#### 5. Reducing the Burden on Small Entities

The information collected in these surveys will represent the minimum burden necessary to evaluate customer experience with the Agency's programs and processes. The Agency will minimize the burden on respondents by sampling as appropriate, asking for readily available information, and using short, easy-to-complete information collection instruments.

#### 6. Consequences of Not Conducting Collection

With regular mechanisms for collecting and generating customer insights, the Agency can provide the public with the highest level of service. These activities will be coordinated to ensure that most individual respondents will not be asked to respond to more than one survey instrument or to participate in more than one qualitative feedback or testing activity per quarter.

Potential negative impact if not collected:

- Reduced end user- and developer-centeredness
  - DASG API programs risk becoming **detached from real-world patient, provider, ACO, and payer needs**, preferences, and lived experiences.
  - Leads to product decisions that are **operationally ineffective** for DASG's communities of developers.
- Program misalignment with vulnerable populations
  - Medicare serves a high proportion of **older adults, people with disabilities, and low-income individuals**.
  - Without regular user input, programs may:
    - Overlook **access barriers** (e.g., rural community needs, digital literacy, etc.)
    - Fail to capture **cultural or linguistic factors**
- Weak performance metrics and evaluation
  - Survey/interview data is often used to:
    - Develop or refine **quality measures**

- Assess **program effectiveness**
- Monitor **satisfaction and access**
- Without this feedback, CMS may rely too heavily on occasional anecdotal data, which lacks **contextual nuance** and patient-reported outcomes.
- Increased risk of policy backlash or non-adoption
  - Programs developed without user input are more likely to face:
    - **Low uptake among providers and patients**
    - **Unintended consequences**, such as overburdening caregivers or excluding non-English speakers

## 7. Special Circumstances

The information collection efforts will be consistent with all the guidelines in 5 CFR 1320.5(g). No such special circumstances would cause this information collection to be conducted in an unusual or intrusive manner. All participation will be voluntary. Should the Agency need to deviate from the requirements outlined in 5 CFR 1320.5(g), individual justification will be provided to OMB on a case-by-case basis.

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

## 8. Federal Register/Outside Consultation

The 60-day public comment notice was published in the Federal Register (90 FR 26591) on 6/23/2025. No comments were received during the 60-day comment period.

The 30-day public comment notice was published in the Federal Register on TBD.

## 9. Payment/Gift to Respondents

The standard will be payment or gift to qualitative respondents for participation. This payment for qualitative respondents will be at a rate of \$100/hr. Quantitative respondents will not be

compensated. Any payments proposed by the Agency will submit specific justification for each proposed use as part of the completed package submitted to OMB.

## 10. Confidentiality

If the Privacy Act applies to a collection under this generic mechanism, the Agency will provide a Privacy Act statement, SORN, or any other associated documentation as necessary. If a confidentiality pledge is deemed useful and feasible, the Agency will include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the Agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

In the absence of a statutory or regulatory-supported confidentiality pledge, the Agency will pledge privacy to the extent provided by law.

## 11. Sensitive Nature

In general, the Agency's generic clearances under this OMB control number will not contain any questions of a sensitive nature. If the Agency identifies a question of a sensitive nature for a specific clearance, we will discuss this in the clearance request.

## 12. Burden of the collection of information

Various instruments and platforms will be used to collect information from respondents. The annual average burden hours requested (5,292) are based on the number of collections we expect to conduct over the requested period for this clearance.

**Customer Research:** The respondent burden averages from five (5) minutes to one ninety (90) minutes for interviews or focus groups, dependent on the individual activity. This estimation has been based on previous customer research activities conducted by Federal customer experience teams.

The Agency estimates that across all sub-components and services, there will be up to 1,620 individual interviews up to 90 minutes each.

**Customer Feedback (Satisfaction Survey):** The industry best practice is to present every customer the opportunity to provide feedback at each instrumented touchpoint/transaction in a customer journey (ex., After submitting an application, completing a call at a call center, or visiting an in-person service center). The Agency will specify the possible number of respondents based on the estimated annual volume, but this information collection sets a ceiling estimate of 80,400 annually.

Type of Information Collection	Number of Respondents	Number of responses per respondent	Time per response (min.)	Total Burden hours
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Customer Interviews	1,620	1	90	2,430
Feedback Surveys	80,400	1	10	13,446
<b>Total Burden</b>	82,020	na	na	15,876
<b>Average Annual Burden</b>				5,292

### 13. Cost Burden to Respondents

No costs for respondents are anticipated.

### 14. Cost to the Federal government

The Agency may incur costs in providing remuneration for respondents. The CMS Office of Enterprise Data and Analytics will conduct the information collection activities discussed in this request. One GS-13 pay grade level employee for the relevant product will be assigned to oversee these user research activities. According to the Office of Personnel Management (OPM), a GS-13 Step 1 earns \$57.78 per hour<sup>1</sup>. We estimate each individual will spend 10% or 208 hours a year working on these activities, which calculates to a yearly cost of \$12,018.24 (208 x \$57.78) for each product. The annual total for all five Data Analytics and Systems Group products is \$60,091.20.

Additionally, the Agency may incur costs in providing remuneration for respondents. CMS estimates the cost over the next three years to be \$243,000 or approximately \$81,000 annually. This cost comes from providing remuneration for qualitative respondents at a rate of \$100/hr for up to 2,430 hours over 3 years, or up to 810 hours annually.

CMS estimates the total cost over the next three years to be \$423,273.60 (\$243,000 + \$180,273.60) or approximately \$141,091.20 annually.

[https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB_h.pdf)

### 15. Program changes or adjustments.

This is a new information collection request.

### 16. Tabulation and publication.

No attempt will be made to generalize the findings from these two groups of activities to be nationally representative or statistically valid. They are meant to complement and help contextualize performance and evaluation data as part of a two-pronged approach to understanding Federal program implementation and opportunities for improvement (Performance, Evaluation, and “Feedback” data<sup>1</sup>).

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<sup>1</sup> [https://ssir.org/articles/entry/time\\_for\\_a\\_three\\_legged\\_measurement\\_stool](https://ssir.org/articles/entry/time_for_a_three_legged_measurement_stool)

**Customer Research:** Insights gleaned from qualitative customer research may be presented publicly in the format of a conceptual user persona or customer journey map. Customer research can take anywhere from 6 weeks for a short sprint to a full fiscal year, depending on the specific project. The Agency expects most journey mapping efforts to last approximately six months, with a user persona and journey maps ready for feedback (both from internal and external to government stakeholders) within one month of completing customer research.

Publicly available Journey maps will include specific language to contextualize their use and will be included in specific requests. This language can include something like:

*What should I know about journey maps?*

*Journey maps are living documents—continually refined and revisited. There is never a “final” version, and these maps are meant to serve as a summary of the voices of actual customers of U.S. Government services. A map may not precisely document how a Government program is meant to be navigated, accessed, or used. It might not capture every government program or resource available to a customer segment. However, it is the product of a qualitative research approach to gather insights from customers’ actual experiences. These findings can help us to identify areas for high-impact improvements across delivery channels and organizational silos.*

**Customer Feedback:** Once surveys are implemented at regular points along the customer journey interacting with Federal services, data may be shared with the Agency’s community of developers.

This data will include:

- Total volume of customers who were presented with the survey
- Total number of customers who completed the survey
- Mode(s) of collection (ex., online, over mobile, over the phone, paper form)
- The specific survey instrument that shows the Agency’s wording of the feedback survey

The purpose of collecting volume and response numbers is to share customer feedback measures in the context of the response rate and total volume of responses to qualify the interpretation of the CX feedback data.

## **17. Expiration date for OMB approval**

The Agency will include the OMB Control Number and collection expiration date for any consent forms, scripts, or instructions provided by the facilitator for qualitative feedback, testing activity, and on each survey.

## **18. Certification of Paperwork Reduction Act.**



The Agency is not requesting an exception to the certification statement identified in Item 20, “Certification for Paperwork Reduction Act Submissions, “ of OMB Form 83-I.