SECTION 280—MANAGING CUSTOMER EXPERIENCE AND IMPROVING SERVICE DELIVERY

Table of Contents

280.1 Who is responsible for customer experience and service delivery?
280.2 What is Federal government customer experience and service delivery?
280.3 How should agencies identify services?
280.4 What are agency responsibilities to deliver services and make them available through multiple channels?
280.5 How should agencies collect metrics to analyze digital services?
280.6 What is the purpose of implementing this guidance?
280.7 How should agencies manage customer experience?
280.8 How do these efforts relate to the Paperwork Reduction Act (PRA), reducing burden, improving access, and engaging customers?
280.9 How can agencies know their services are working and delivering value for the public?
280.10 How should customer experience be reflected in an agency's Annual Performance Plan?
280.11 What programs have been identified as High Impact Service Providers (HISPs)?
280.12 What steps should HISPs take to manage customer experience?
280.13 How should HISPs designate priority services?
280.14 How should HISPs collect and submit "post-transaction" customer feedback?
280.15 What shall HISP CX Capacity Assessments and Action Plans include?
280.16 How should agencies participate in designated Life Experiences and other coordinated government-wide efforts to improve customer experience?

Summary of Changes

Integrates relative components from OMB Memorandum M-23-22. Outlines additional information about the Life Experience projects. Updates timelines for implementing HISP activities in FY 2025. Clarifies HISP reporting and customer feedback requirements and process. Details customer research approaches. Includes employee experience as component of overarching CX.

280.1 Who is responsible for customer experience and service delivery?

All Executive agencies (5 U.S.C. 105) have a responsibility to manage customer experience and improve service delivery using leading practices and a human-centered approach, pursuant to Executive Order 14058 ("E.O. 14058"), Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government (December 13, 2021), and the 21st Century Integrated Digital Experience Act (P.L. 115-336) ("21st Century IDEA"). To effectively meet these responsibilities, senior accountable officials from agencies should coordinate activities and convene cross-functional leadership, program, and field office staff across operations, policy, budget, communications, technology, evaluation, data, customer experience, digital service, and other appropriate agency components to apply the guidance provided in this section. All agencies should apply the guidance provided in this section for annual customer experience management and planning, as well as the design of feedback surveys and measurement strategies for the performance of Federal services. This guidance provides detail on activities to be conducted by designated High Impact Service Providers (HISPs, as defined in section 280.11), which are required to implement the guidance in sections 280.12 through 280.15.
In support of agency responsibilities to manage customer experience and to improve service delivery, the Director of the Office of Management and Budget is responsible for issuing guidance, convening stakeholders, supporting processes, facilitating decision-making and collaboration, enabling customer research and voluntary feedback, and strengthening data-driven strategic, financial, and operational planning to sustain customer experience and service delivery improvements.

280.2 What is Federal government customer experience and service delivery?

It is the Federal government's responsibility to ensure that every interaction a member of the public has with their government demonstrates competence and transparency and builds trust. As defined by E.O. 14058, the term "customer experience" ("CX") means the public's perceptions of and overall satisfaction with interactions with an agency, product, or service. Building on this definition and applied in the broader context of this Section and the Federal Performance Framework, the term refers to a combination of factors that result from touchpoints between an individual, business, or organization and the Federal government over the duration of an interaction, service journey, and relationship. These factors of experience can include: ease/simplicity/effort (burden/friction), efficiency/speed, transparency, equity (e.g., participation, access), humanity (e.g., respect, dignity, empathy), effectiveness/perceived value of the service itself, and interactions with any employees. Perceived responsiveness to individual needs and ability to provide feedback is also important. Similar to their application in the private sector, these factors can drive the overall satisfaction with and trust in the program, agency, and the government at large. A customer's experience interacting with the Federal government directly contributes to their trust in government itself.

To that end, measures of experience are of equal importance as traditional measures of financial and operational performance, and which this document begins to outline an accountability framework to deliver.

Services are the unit of observation for this performance accountability irrespective of perceived current ownership or budgetary/organizational lines. "Service delivery" means the actions taken by an organization, such as the Federal government, related to providing a benefit or service to a customer of a Federal government entity; the term refers to the multitude of diverse interactions between a customer and Federal agency. The Federal customer experience framework is centered on services. Services are a more well-defined unit of observation for customer experience management than a Federal program. In many sectors, the service, even more so than the offering or end product, determines the customer's satisfaction and the reputation of the organization or brand. Other factors affect customers' total experience — the environment, prior interactions, etc. — but the service is the most critical part controlled by the entity.

Today, citizens are often dissatisfied with government services when compared against the private sector, which has leveraged technology, process re-design, self-service, empowered front lines, and other tactics to raise expectations. All Federal agencies should have knowledge, and in some instances documentation, of the services they provide (e.g., SNAP recertification, land border checkpoints, business tax filing) and should be able to articulate how the components of the services, such as the occasion, offering, channels, roles, and tools, come together to make up the agencies' approach to service design and delivery.

The Federal customer experience framework is intended to provide agencies with a clear approach and roadmap for aligning service design with customer needs in a continuously improving manner. For

---

1 E.O. 14058 defined critical terms like "Customer Experience." A list of related terms and their definitions can be found here: https://performance.gov/cx/terms.
2 The OECD has done work to demonstrate that "government's competence - its responsiveness and reliability in delivering public services and anticipating new needs - are crucial for boosting trust in institutions." See https://www.oecd.org/gov/trust-in-government.htm.
definitions of terms (such as "services" and service types) used in the previous paragraphs as well as others relating to CX and service delivery, please see https://performance.gov/cx/terms.

280.3 How should agencies identify services?

The 21<sup>st</sup> Century IDEA and OMB Memorandum M-23-22, Delivering a Digital-First Public Experience (September 23, 2023), which provides guidance to agencies on how to design and deliver websites and digital services to the public and on how to assist agencies as they continue to implement the 21st Century IDEA, requires all Executive agencies (5 U.S.C. 105) to identify public non-digital, paper-based, or in-person government services for purposes of digitization. To fulfill this requirement, agencies will be required to provide information about public-facing services to the Federal Services Index, which is currently under development. OMB, in coordination with GSA, will release additional instructions for agencies about this requirement. Agencies should refer to the OMB Memorandum M-23-22 MAX page (https://community-dc.max.gov/x/pwiFkQ) for updates about this requirement.

280.4 What are agency responsibilities to deliver services and make them available through multiple channels?

Service delivery through multiple channels increases access and participation, ensuring that government services are available to all – including those who need them the most, such as underserved communities. Agencies are encouraged to leverage a multi-channel approach – as is appropriate, feasible, and supported by customer research – including both traditional (e.g., in-person, postal mail, or phone) and digital channels, to ensure the equitable and effective delivery of services.

OMB Memorandum M-23-22 sets requirements and expectations for the digitization of forms and services. Specifically, it requires to the greatest extent practicable that agencies:

- Make forms available to the public in a digital format.
- Make services provided to the public available in a digital channel and in a manner that maximizes self-service task or transaction completion.
- Not require a handwritten signature ("wet signature") or other in-person identity proofing requirements as a requirement for completing a public-facing form or service without also providing the public with an equivalent digital method.

Additionally, agencies should maintain accessible methods for completing services to enable individuals without sufficient access to information technology and/or digital literacy to successfully utilize those services, in alignment with OMB Memorandum M-24-08, Strengthening Digital Accessibility and the Management of Section 508 of the Rehabilitation Act (December 21, 2023).

280.5 How should agencies collect metrics to analyze digital services?

Agencies should ensure, to the greatest extent practicable, that all services and tasks are made available through digital channels using industry leading practices and human-centered design. Examples of digital service channels include websites, mobile apps, email, text messaging, and social media.

In general, and consistent with the requirements in OMB Memoranda M-23-22, M-10-22, Guidance for Online Use of Web Measurement and Customization Technologies (June 25, 2010), and M-24-08, agencies should use the following leading practices for gathering and analyzing metrics for digital services:
In designing metrics for a website or web application, agencies should work backward from customer insights and strategic questions. Agencies should also define specific actions they plan to take to improve digital experience with the service or product, based on insights derived from digital analytics.

An agency's digital analytics program(s) (e.g., the General Services Administration's Digital Analytics Program) should capture data from key customer actions, such as button clicks and page views. As specified in OMB Memorandum M-23-22, agencies are required to participate in the General Services Administration's Digital Analytics Program.

Agencies should attach timestamps to data points to trace a user's journey through time as well as analyze macro-level shifts in user behavior over longer time periods.

Agencies should collect website and web application metrics on a continuous basis to observe longitudinal trends.

Agencies should regularly and routinely scan web content using automated testing tools to help ensure conformance with the digital accessibility standards and guidelines (e.g., Section 508, Web Content Accessibility Guidelines). Because automated testing tools cannot fully assess conformance to accessibility standards, agencies should also leverage manual testing methods in combination with automated scanning.4

Agencies should collect website and web application data in a structured and machine-readable format to facilitate quantitative aggregation (e.g., sum, median, mean, minimum, maximum) of customer behavior data for analytics and monitoring.

Agencies are encouraged to implement continuous monitoring and dashboards to proactively visualize when there has been a significant change or regression in the customer's digital experience (e.g., if page views or volume of key transactions has suddenly dropped). Implementing alarms to send alerts when critical metrics have regressed allows for immediate corrective action.

As new user flows are added, digital analytics should be implemented at the launch of the new feature (e.g., website, form, digital tool) to ensure comprehensive monitoring of customer digital experience. Changes to continuous monitoring and dashboards should reflect any user flows that are optimized, deprecated, or replaced.

Agencies should determine an approach for identifying the user count on digital channels who begin and end a customer journey for a public-facing service. For all digital channels available to complete tasks related to such services, agencies should be able to track where and how many users drop off (i.e., fail to progress through the customer journey). This information will help agencies understand where and how to optimize the service delivery process for users on digital channels. OMB will seek information from select agencies to formulate best practices for analytics in this area.

Post-transaction customer feedback survey data generates perceptions of trust and drivers of experience with government services (see section 280.14). The collection and use of website and web application data may be used to augment point-in-time data and may also be instrumental for evaluating an agency's changes to digital services that enhance customer interactions and experiences.

---

4 For more information on accessibility testing methods for web content, please visit the Testing Methods page on Section508.gov.
280.6 What is the purpose of implementing this guidance?

Implementing the guidance specified in this section will establish a more consistent, comprehensive, robust, and deliberate approach to CX across government. The purpose of this guidance is to:

- Increase agencies' understanding of customers' needs and measure continuous improvement of Federal government services to better meet customers' priorities;
- Establish a CX-mindful culture across Federal government services;
- Improve customer trust in Federal government;
- Provide structure and consistency around how agencies/programs approach CX;
- Promote accountability and governance mechanisms to improve service design, quality and service;
- Ensure Federal service providers are making progress in growing CX program maturity, service definition, and applying leading practices\(^5\);
- Ensure Federal service providers are receiving and acting upon customer feedback to drive performance improvement and service recovery;
- Allow for government-wide comparative assessment of trust in government following interactions;
- Ensure transparency through informed consent and public reporting; and,
- Encourage the application of human-centered design as foundational to achieving customer experience outcomes.

280.7 How should agencies manage customer experience?

At multiple levels of government organizations (e.g., departmental enterprise, bureau, program office, service center), elements of core CX functions should be present.\(^6\) These include:

- **Measurement**: Defining and instituting CX outcome measures, as well as service operational measures, to ensure accountability for improving service delivery and communicating performance across the organization and to the public, routinely analyzing and making use of this data;

- **Governance and Strategy**: Institutionalizing CX by identifying executives and leaders responsible, organizing supporting resources, defining the processes by which strategic decisions incorporate customer perspective, and aligning CX strategy and activities with business decisions, initiatives and investments within the agency’s broader mission and strategic priorities;

---

\(^5\) For examples of leading practices and industry frameworks for managing customer experience, please review the annual CX Capacity Assessment template provided on performance.gov/cx.

• **Culture and Organization**: Acquiring and developing the talent required to incorporate and improve CX within agency activities, and empowering all employees to adopt a CX mindset through training, performance measurement, and rewards;

• **Customer Understanding**: Identifying the main occasions that result in the public making use of or interacting with Federal services and conducting qualitative and quantitative research across organizational silos to map intra-agency customer journeys, as well as cross-agency journeys where applicable, to build and continually refine a knowledge base of the agency’s customer segments and needs, integrating disparate customer interaction and administrative data; and,

• **Service Design and Improvement**: Adopting a customer-focused approach to the implementation of services, involving and engaging internal customers (such as employees) and external customers in feedback gathering and iterative development, designing and building digital products and services, adopting leading practices to deliver more efficient and effective interactions, and sharing lessons learned across government.

Each fiscal year, Executive agencies should reflect on their maturity and capacity to perform these functions, such as during strategic review, annual planning, and in executing requirements outlined in this section. Further, agencies and programs should develop an understanding of the types of and explicit definition of the services they offer (as defined in sections 280.2 and 280.3); this should include an assessment of the talent they have to perform and oversee these functions, and specifically identify needs for hiring individuals with the expertise and experience into their agency.

### 280.8 How do these efforts relate to the Paperwork Reduction Act (PRA), reducing burden, improving access, and engaging customers?

Engaging customers and speaking directly with the public is a central component of human-centered design and leads to a better understanding of the problems faced by the public, including underserved communities, which helps agencies design solutions that are more responsive to the needs of the American people. The surveys described in section 280.14 are not the only methods through which agencies can engage with customers. When developing approaches to customer engagement, research, and feedback gathering, agencies should also consider burdens placed on individuals and groups most affected by information collection related to accessing and maintaining eligibility for public benefits programs.7

To enable agencies to more easily engage with customers by conducting customer research and making use of voluntary customer feedback, OMB supports agencies to maintain and use the OMB Circular A-11 Section 280 Umbrella Clearance (“umbrella clearance”) that can be established at the department level using the templates provided on the Customer Experience Collections MAX Page. Once established, the umbrella clearances must be renewed every three years. These umbrella clearances provide a framework for conducting qualitative customer research and user testing, both of which seek to involve the individuals and organizations that agencies serve in the actual design and improvement of those services. Individual collection requests, such as customer feedback surveys described in section 280.14, under this clearance...

---

will be reviewed by OMB’s CX Desk Officer in collaboration with the relevant policy analyst in OMB’s Office of Information and Regulatory Affairs (OIRA) in an effort to further harmonize the review of these types of collections.

Outside of the customer research and feedback opportunities that are made easier under the umbrella clearance, agencies are able to explore other opportunities for customer engagement. Agencies should note that approval under the Paperwork Reduction Act is not always required when speaking with members of the public, and OIRA has published extensive guidelines that can help guide agencies to appropriate flexibilities. Below are a few highlights that, in addition to options available through the umbrella clearance, may be useful to understand when an agency is looking to learn about the public’s experience with their services:

- **Collecting Information from Nine or Fewer Members of the Public:** PRA approval is not needed when an agency is collecting information from nine or fewer members of the public within a 12-month period. For example, if an agency collected information from nine people on January 1, 2025, and then from another nine people on that same topic on January 2, 2026, the PRA would not be triggered because although the total amounted to more than nine, there were only nine individuals engaged on the topic within a 12-month period. Often, discovery and design work can be accomplished effectively with nine or fewer people within a 12-month period, such as through interviews, focus groups, or product testing. However, using multiple groups of nine within a 12-month period for the same purpose or with the same set of questions would require PRA approval.

- **Recruiting 10 or More Members of the Public:** The applicability of the PRA for recruiting 10 or more members of the public depends on the intention and specifics of the request. For example, PRA approval is not required when asking if people are interested in participating and, if so, to send contact information for attendance at a meeting or to express interest in participating in a usability test, focus group, or interview; however, asking one or more screening questions (orally or in writing), such as a demographic question or "to what degree do you use this service?" will require a PRA approval.

- **Open-Ended Questions During the Design/Discovery Phase:** Conducting unscripted conversations in the design or discovery phase will not generally require PRA approval. For example, displaying a prototype or service and observing and/or asking for general thoughts and reactions, asking participants to narrate their experience of using a product or service, and asking questions during a public listening session to promote discussion generally will not require PRA approval.

- **Post-Transaction Customer Feedback Activities from 10 or More Individuals:** PRA approval is needed for post-transaction surveys (assuming an agency is surveying 10 or more individuals within a 12-month period). When data is being collected to understand and continuously improve an existing product or service (not during the design and discovery phases), the PRA will apply.

Additionally, as noted in OMB Memorandum M-23-22, "Agencies should compensate participants for their time and expertise when conducting user research, where appropriate. Compensation improves recruiting and ensures that agencies are gathering input from a diverse group of users, including those from underserved communities. Agencies should establish policies and processes to compensate research participants."

Increasingly, agencies are recognizing the importance of including hard-to-reach populations, particularly those from underserved communities, in their samples in order to improve the quality and representation of customer research. If your agency wishes to provide compensation or incentives to participants in focus groups or other similarly time and effort-intensive feedback surveys, the first step is to have a conversation
with your agency's legal counsel to determine whether your agency may offer incentives, and if so, what kind and in what amount. If your agency's legal counsel approves providing incentives to participants, you will need to justify these incentives in the Information Collection Review package you submit to OMB. Contact the OMB CX Desk Officer for an example of what a justification for incentives should look like for purposes of the PRA submission to OMB.

280.9  How can agencies know their services are working and delivering value for the public?

Traditionally, agencies have solely used output and program integrity measures to assess performance. Under E.O. 14058, customer experience measures are considered equally as important as operational measures. There are various ways agencies should be collecting and using customer experience measures to monitor, improve, and report on the performance of their designated services. The following activities are core components that agencies should adopt to center the voices of customers, including customers from underserved communities, in their service delivery and improvement:

- **Customer Research Activities:** Customer research is one of the first steps agencies can take to better understand their customers and is generally associated with the discovery phase of the service improvement journey. Customer research enables agencies to learn who their customers are, their specific needs, and what pain points exist, among other insights. Research can be conducted in both structured (e.g., a customer survey, a focus group) and unstructured (e.g., in-person customer observation, reviewing social media messages) formats. Common products resulting from customer research include user personas, customer segments, and journey maps.

- **User Feedback Activities:** User feedback typically involves using tangible artifacts to help better understand how users react or interact with an existing, new, or improved product or service (e.g., conducting initial research about customer pain points using an existing product, assessing customer reactions to a new language rewrite of a website, launching a prototype of a new digital form). Typically associated with the design phase of the service improvement journey, user feedback activities test assumptions, validate research, and provide further insights for product and service design before, during, and after the launch of a product or service. These activities can be conducted in many formats including user observations, focus groups, card sorting, usability studies, A/B testing, and other methods.

- **Post-Transaction Customer Feedback Activities:** Post-transaction customer feedback is any feedback that is collected from customers after they have engaged with a service provider at any touchpoint in their service journey. Typically, through the form of a post-transaction survey, the service provider is able to collect structured data on trust, drivers of the experience, and open-ended comments. With some exceptions, OMB defines "post-transaction" as the 48-hour period following the end of the customer interaction with a service, acknowledging that the most appropriate post-transaction feedback opportunity may vary by service characteristics.

- **Data-Driven Decision-Making Activities:** Data gathered by agencies (e.g., administrative data, operational data, systems data, digital analytics data, post-transaction feedback data, qualitative data from customer engagement activities like focus groups and listening sessions, etc.) from across multiple channels (e.g., digital, phone, system, etc.) should form a customer listening data ecosystem that informs agency decision-making, goal setting, and strategic planning. Data should be made available to staff directly managing service delivery, as well as leadership overseeing agency priority-setting on a regular and consistent basis. Agencies should also ensure staff exist within the organization that have the skillset and experience to integrate, analyze, and communicate insights from various data streams, such as by visualization or through storytelling. Where practical, agencies should integrate customer experience measures into existing dashboards of
operational metrics in ways that consider specifics of service delivery, such as differentiating between channels, regions, customer use cases, and customer segments.

- **Voice of the Customer (VOC) Program Activities:** A VOC program is a systematic approach for collecting, analyzing, and taking actions based on the customer research and feedback data that an organization collects. Data streams may include structured sources (e.g., post-transaction feedback surveys), unstructured sources (e.g., emails, online reviews, social media messaging, chats, and call center notes), qualitative research (e.g., focus groups and usability testing), and quantitative research (e.g., an annual customer research survey). A mature VOC program includes three core elements:

  1. An enterprise surveying platform that is able to solicit, ingest, analyze, and visualize customer feedback, as well as integrate with operational, digital analytics, and case management data;
  2. Sufficient agency staffing to monitor, analyze, and interpret key transaction points and trends across time; and,
  3. A change in business processes whereby agencies are engaging leadership and frontline staff with the integrated data to arrive at a shared understanding of customer pain points and to co-design and implement service delivery improvements.

**280.10 How should customer experience be reflected in an agency's Annual Performance Plan?**

Agency Annual Performance Plans should include indicators for outcomes related to customer experience and relevant service levels. This should include customer feedback data collected as described below in section 280.14, as well as service level indicators (e.g., wait times, website analytics) appropriate to their program. More information on integrating this information into the Annual Performance Plan is included in section 210.

**280.11 What programs have been identified as High Impact Service Providers (HISPs)?**

As defined in E.O. 14058, High Impact Service Providers are those Federal entities designated by OMB that provide or fund high-impact customer-facing services, either due to a large customer base or a high impact on those served by the program. The list of HISPs is reviewed and updated periodically by OMB. The current list of HISPs is available at [http://www.performance.gov/cx/hisps/](http://www.performance.gov/cx/hisps/).

The senior accountable official for identified HISPs (or appropriate senior official) shall coordinate activities described in section 280.12 for the enterprise. In addition to relevant program and field office staff, these activities should serve as intra-agency convening mechanisms around the customers served and involve cross-cutting representation from mission support functions within the agency, including the Chief Information Officer, Chief Human Capital Officer, Chief Financial Officer, Performance Improvement Officer, Evaluation Officer, Chief Data Officer, Communications / Public Affairs Leadership, Chief Procurement Officer, and Customer Experience / Digital Service Teams.

**280.12 What steps should HISPs take to manage customer experience?**

Given the significance of the services they provide and the requirements in E.O. 14058, HISPs must:

- In collaboration with OMB, by May 31, 2025, designate at least two (2) priority services in alignment with the guidance outlined in this section for focused assessment and the activities;
• Deploy post-transaction customer feedback survey(s) that meet the survey guidelines in section 280.14. Feedback surveys may be deployed at key touchpoints between the customers and the service provider along the service journey, or at the end of the customer journey, for each current designated service;

• Submit the dataset(s) for the post-transaction customer feedback survey(s) of each current designated service on time for each quarter. Quarterly submissions will be due the last business day of the month following the last day of the quarter. For FY 2025, these due dates are January 31, April 30, July 31, and October 31, 2025;

• Conduct an annual CX Capacity Assessment (submitted to OMB by February 21, 2025) for both HISPs and HISP-maintaining departments and discuss the resulting findings with OMB at an annual CX Deep Dive (completed by April 23, 2025);

• Develop a draft CX Action Plan (submitted to OMB by May 30, 2025) and final CX Action Plan (submitted to OMB, along with the budget submission, by September 9, 2025) annually for each designated HISP and HISP-maintaining department, with a focus on improvement actions for designated services; and,

• As directed in E.O. 14058, embed more customer-focused practices into their service design and delivery, such as conducting service assessments, undertaking customer research through qualitative and quantitative research and journey mapping, approaching more holistic calculations of burden (learning, compliance, and psychological costs, in accordance with OMB Memorandum M-22-10) for their service transactions and full journeys, and continually testing new or improved program elements with customers to refine and improve services and products.

280.13 How should HISPs designate priority services?

Annually, based on an agency’s knowledge of existing services each HISP is required to designate two or more of these services for targeted customer experience improvement efforts. These services will be the subject of CX Capacity Assessment and Action Plans, will be highlighted on www.performance.gov/cx, and will be the focus of post-transaction customer feedback dataset(s) submitted quarterly and shared publicly.

As HISPs determine which services to designate, they should consider designating priority services that focus on the one or two most important things the HISP does to serve its customers (e.g., high percentage of the population served, high volume of annual transactions, outsized impact in the lives of the people served [e.g., where successful use of the services has a consequential impact on the livelihood of an individual group, such as Tribal members' access to trust assets, or an individual applying for benefits under the Energy Employees Occupational Illness Compensation program]). Importance can be defined in several different ways, but each HISP should be able to clearly articulate why choosing this service drives value to the organization and to customers and contributes to the performance of the agency, and should utilize data, including input gathered through customer engagement, to determine which services to prioritize.

HISPs should also consider OMB Memorandum M-22-10, Improving Access to Public Benefits Programs Through the Paperwork Reduction Act (April 13, 2022) when choosing services to designate. OMB Memorandum M-22-10 provides guidance to help agencies identify and reduce burdens related to applying for and maintaining eligibility for public benefits programs, with a particular focus on members of underserved and marginalized communities.
HISPs should remember that services require actions taken by customers to accomplish tasks, receive benefits, submit information, or otherwise engage with an agency, and should be considered through the lens of the customer. HISPs should also consider how designated services relate to their agency strategy plans, priority goals, learning agendas, equity plans, organizational health measures, and other planning processes.

280.14 How should HISPs collect and submit "post-transaction" customer feedback?

HISPs providing services to the public should measure their touchpoint and transactional performance in line with industry leading practices for customer feedback surveys. Measuring, collecting, and sharing post-transaction customer feedback assists in developing comparable, government-wide scores that enable cross-agency benchmarking (when relevant), identifying improvements and service elements that most effectively improve trust for different service types, and reducing burden on the public.

OMB outlines three types of customer feedback surveys:

- **Post-Transaction**: The customer recently completed (generally defined as within the last 48 hours) a single, stand-alone interaction with the service provider (e.g., a survey after viewing a website to find a piece of information to initiate a service journey, or after speaking with a contact center employee). A service journey may consist of multiple interactions between the service provider and customers; therefore, there may be multiple opportunities for post-transaction feedback.

- **Post-Service Journey**: The customer completed a series of interactions or a multi-stage process of a service (e.g., a survey after the process for applying for and receiving Federal student aid, filing an individual tax return, or a specific period of someone's life that included transacting with services such as one-month post-partum). Post-service journey is generally considered to be at the end of the service journey to capture the overall experience, though it may also constitute a stage or stages within the full service journey, depending on service type and/or characteristics.

- **Relational**: The customer completed multiple transactions, service journeys, or a lifetime of engagement with the agency (e.g., a survey after a customer's most recent year of interacting with an agency or program) and is asked to reflect on their relationship with the service provider.

HISPs must deploy at least one post-transaction customer feedback survey in line with a significant touchpoint of the service journey for each of their current designated services. HISPs should work with OMB to determine relevant and appropriate opportunities for post-transaction customer feedback and are encouraged to deploy multiple post-transaction customer feedback surveys. If a HIS is deploying only one post-transaction customer feedback survey, it should be at or near the completion of the service journey.

The below framework, including question wording, response architecture, and branching logic, seeks to reduce burden on the public and to provide HISPs with quick-turn, actionable data to inform service delivery improvements. All HISPs should consider applying this model, although exceptions will be made for HISPs that have demonstrated success with the previous model and facility with and capacity to use more granular data for service delivery improvements. All post-transaction customer feedback surveys will require PRA approval under the OMB Circular A-11 Section 280 Umbrella Clearance.

While HISPs are encouraged to deploy customer feedback surveys that meet their research needs, only datasets from post-transaction customer feedback surveys that align with the survey guidelines outlined in this section will be accepted as meeting the quarterly data reporting requirement described in section 280.12. The survey guidelines in this section are designed so that HISPs are developing comparable, government-wide customer experience measures that can be monitored over time and shared publicly.
HISP customer feedback surveys must include:

**Q1 Required Wording:** I trust [Agency X] to deliver on its [mission Y] to the [American public/customer group Z].

Depending on the service and transaction context, other iterations of wording for this question could include sentences such as:

- Based on my experience calling the IRS, I trust IRS is working in the best interest of the American public.
- Having completed the FAFSA, I trust FSA to deliver on its responsibility to students.
- Based on my passenger screening experience, I trust that TSA is providing a safe and secure experience for the traveling public.

If a HISP proposes to use a Likert scale (e.g., for 5 points – strongly agree, agree, neutral, disagree, strongly disagree), rather than a binary thumbs up/down response for a respondent's agreement with the Q1 statement, the adapted wording and scale will be reviewed as part of the PRA approval process. Please note that if a HISP does employ a Likert scale, OMB will work with them to understand whether and how different ratings (e.g., 3, 4, and/or 5 out of 5) will be accounted for in OMB's overall trust calculations to be incorporated in the percentage of respondents that responded in the affirmative on trust in OMB data visualizations and public reporting.

If respondent provides "thumbs up" or the highest Likert scale rating (e.g., 5):

**Q2a Required Wording:** What about this interaction made the difference? (Tap/Select all that apply)

<table>
<thead>
<tr>
<th>Driver Category</th>
<th>Corresponding Statement</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effectiveness</td>
<td>My need was addressed. My issue was resolved.</td>
<td>Required</td>
</tr>
<tr>
<td></td>
<td>I found what I needed. My question was answered.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I successfully completed [service/task].</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Or similar.)</td>
<td></td>
</tr>
<tr>
<td>Ease</td>
<td>It was easy to complete [the task/service/what I needed to do].</td>
<td>Required</td>
</tr>
<tr>
<td></td>
<td>It was easy to find what I needed.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Or similar.)</td>
<td></td>
</tr>
<tr>
<td>Efficiency</td>
<td>It took a reasonable amount of time to do [the task/service/what I needed to do].</td>
<td>Required</td>
</tr>
<tr>
<td></td>
<td>I found what I needed. My need was addressed.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Or similar.)</td>
<td></td>
</tr>
<tr>
<td>Transparency</td>
<td>I understand what was being asked of me throughout the [task/service/process].</td>
<td>Required if</td>
</tr>
<tr>
<td></td>
<td>I understand the reason for the [Agency/Program/service]'s decision.</td>
<td>applicable</td>
</tr>
<tr>
<td></td>
<td>(Or similar.)</td>
<td></td>
</tr>
<tr>
<td>Humanity</td>
<td>I was treated fairly. My need was addressed.</td>
<td>Required if</td>
</tr>
<tr>
<td></td>
<td>(Or similar.)</td>
<td>applicable</td>
</tr>
<tr>
<td>Employee Interaction</td>
<td>Employees I interacted with were helpful.</td>
<td>Required if</td>
</tr>
<tr>
<td></td>
<td>The [employee/call center representative/etc.] was committed to [solving my problem/answering my questions/etc.].</td>
<td>applicable</td>
</tr>
<tr>
<td></td>
<td>(Or similar.)</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>Something else. None of the above.</td>
<td>If applicable</td>
</tr>
<tr>
<td></td>
<td>(Or similar.)</td>
<td></td>
</tr>
</tbody>
</table>

HISPs are encouraged to the extent possible to simplify statements to 1-3-word clauses and use iconography as relevant.
If respondent provides "thumbs down" or a rating other than the highest, indicating an opportunity to understand what could be improved:

| Q2b Required Wording: What could have been better? (Tap/Select all that apply) |
|---------------------------------|-------------------------------------------------------------------------------|
| Driver Category | Corresponding Statement | Status |
| (Not shown) | (HISPs may choose one statement per driver category to be shown in a multiple selection question format; HISPs may modify example statements to align to specific contexts/services.) | |
| 1 Effectiveness | My need was not addressed. My issue was not resolved. I did not find what I needed. My question was not answered. I did not successfully complete [service/task]. (Or similar.) | Required |
| 2 Ease | It was difficult to complete [the task/service/what I needed to do]. It was difficult to find what I needed. (Or similar.) | Required |
| 3 Efficiency | It took too long to do [the task/service/what I needed to do]. I did not find what I needed on the site quickly. (Or similar.) | Required |
| 4 Transparency | I did not understand what was being asked of me throughout the [task/service/process]. I did not understand the reason for the [Agency/Program/Service]'s decision. (Or similar.) | Required if applicable |
| 5 Humanity | I was not treated fairly. (Or similar.) | Required if applicable |
| 6 Employee Interaction | Employees I interacted with were not helpful. The [employee/call center representative/etc.] was not committed to solving my problem/answering my questions/etc.. (Or similar.) | Required if applicable |
| 7 Other | Something else. None of the above. (Or similar.) | If applicable |

HISPs are encouraged to the extent possible to simplify statements to 1-3-word clauses and use iconography as relevant.

| Q3 Required Wording: Anything else you want us to know about your experience? (Or similar.) |
|---------------------------------|--------------------------------------------------------------------------------|
| [Free text response] | May be excluded if the format/delivery channel of the survey, such as an interactive voice response (IVR) or telephone-based survey, does not capture and transcribe the voice recording. |

Additional considerations for post-transaction customer feedback survey:

- HISPs may propose to include additional questions such as customer segments and purpose of interaction to collect more useful data. Additional questions should be placed after the required questions (Q1 and Q2a/b) outlined above. Q3 may be placed at the end of the survey.
- While HISPs are required to include Q1, Q2a/b, and Q3 in the survey, all questions on the survey must be optional for respondents. In this context, optional means two things: that a respondent's decision to not answer one or more questions on the survey will not in any way affect the respondent's receipt of benefits or services, subject them to any penalties, or otherwise negatively impact them, and a respondent can decide to not answer a question and still be permitted to complete the other questions on the survey.
- Total survey length should not exceed 15 questions and five minutes of burden (in addition to accounting for the PRA considerations in section 280.9).
- When designing post-transaction customer feedback surveys, HISPs should review the list of drivers and corresponding statement examples for each driver in Q2 to determine the optimal list of drivers to offer respondents noting the survey's purpose, audience, channel, and data needs. In
particular, when using a Likert scale structure for Q2, HISPs are encouraged to include a "none of the above" option among the responses in Q2 to minimize risks of end-aversion concerns and/or biases.

- HISPs should administer surveys by applying practices that promote the validity, accuracy, and utility of the data and that facilitate ease of response. For example, to promote ease of response, HISPs can use methods such as presenting only a single-screen (even on a mobile device) version of the survey.
- HISPs may propose sampling strategies that reduce burden on respondents and reduce cost while maintaining survey validity.
- HISPs should deploy post-transaction feedback survey(s) in the channels (e.g., mail, phone, online, email, texting, in-person, etc.) that are appropriate and relevant to the experience of the customers for that service (e.g., if a service includes visits to a government webpage, surveying online makes sense; if a service is paper-based, a paper survey with both mail-in and phone option is appropriate).
- OMB will collaborate with each HISP through the PRA approval process to determine the response architecture (Likert scale or thumbs up/down) to the Q1 trust statement above. OMB will consider factors including data quality and validity, aggregating metrics, granularity of analysis, and the relevant context of each HISP.

How to submit post-transaction customer feedback dataset(s) to OMB

HISPs are required to report the dataset(s) from the post-transaction customer feedback survey(s) for each of their current designated services each quarter. Customer feedback surveys that are inconsistent with the above survey guidelines will generate data that are incompatible with the goal of developing a set of comparable, government-wide customer experience measures. Therefore, it is important the HISPs are following the above survey guidelines when developing their post-transaction customer feedback surveys.

HISPs may report datasets from multiple post-transaction customer feedback surveys for each current designated service. During the reporting process, HISPs will be asked to provide additional information on the preceding interaction and on the survey itself.

Dataset(s) must include raw responses for Q1 and Q2 so that OMB may conduct analysis on drivers tapped for individual trust responses across all reported services. Raw responses for Q3 are required; however, HISPs may propose to opt out of submitting raw responses for Q3 due to privacy considerations.

Guides for how to format datasets and how to report customer feedback data to OMB are provided on the CX MAX Community page. The formatting guide includes specific instruction on the number of columns, exact field names, order of attributes, and other helpful information. The reporting guide includes a step-by-step walk-through and screenshot of the reporting interface and the additional information that will be collected. HISPs may also reach out to OMB for additional support.

Submissions will be due the last business day of the month following the last day of the quarter: for FY 2025, these due dates are January 31, April 30, July 31, and October 31, 2025. HISPs (many of which are collecting data in real-time) should submit their dataset(s) as soon as they are able following the last day of the quarter. Feedback data will be made available publicly on performance.gov in coordination with OIRA. Agency-specific post-transaction feedback data are currently published on performance.gov/cx and can be included in the Annual Agency Performance Plan (see section 280.1). A Federal-level trust measure and success target is published on https://www.performance.gov/pma/cx/data/.

Agencies seeking to create an agency-specific CX reporting website (i.e., agency.gov/cx) highlighting their CX efforts should contact OMB so that reporting duplication and overlap can be minimized.
For newly designated service(s), the HISP has a maximum of 365 calendar days from the date of designation to develop a post-transaction customer feedback survey for the designated service and to begin quarterly dataset reporting.

Additional considerations for services that have web content:

As specified in OMB Memorandum M-23-22, agencies should "provide a feedback mechanism for users to report satisfaction or dissatisfaction with each web page or piece of web content." This type of mechanism is often a persistent component at the bottom of webpages that asks, "Was this page helpful?" OMB will provide more guidance to agencies regarding webpage content feedback collection when this information is available. Agencies should work with OMB to identify an approach where webpage content feedback and customer feedback are used in complementary ways; agencies should not use one as a substitute for the other.

280.15 What shall HISP CX Capacity Assessments and Action Plans include?

The content of CX Capacity Assessments shall address the core CX functions at the HISP enterprise-level outlined in section 280.7 as well as the results of designated service assessments. Further, HISPs maintaining department-level CX organizations will also be asked to complete an annual CX Capacity Assessment.

The content of the CX Action Plans shall address specific delivery improvements to designated services, as well as actions to improve the maturity of CX, service delivery capabilities and capacity, and equity in service delivery. This includes updates to current year priorities, adjustments to the following year's priorities, and proposals to be considered in the formulation of the next President's Budget (in this case, FY 2027). Actions should address pain points—including barriers faced by underserved communities—identified through service assessments, customer feedback, human-centered design research, and other evidence-generation activities. CX Action Plans should focus on customer outcomes and should communicate what success will look like in terms of what any proposed improvements will mean for an individual customer using the service. Commitments will be made publicly available on performance.gov/cx.

An annual HISP CX Capacity Assessment and Action Plan template will be made available on the CX MAX Community page.

280.16 How should agencies participate in designated Life Experiences and other coordinated government-wide efforts to improve customer experience?

Life experiences—such as recovering from a disaster or starting a family—are significant events or transitions during which individuals interact with multiple Federal programs. Customers may access services directly with Federal agencies or indirectly via the private sector or State, Tribal, territorial, or local government agencies. During these crucial periods, relevant Federal agencies must proactively coordinate service delivery to create an integrated, human-centered experience that meets people's needs, wants, and expectations. Agencies participate in OMB-designated Life Experiences and other cross-agency efforts to coordinate service delivery. This section guides agency participation in both areas.

OMB-designated Life Experiences

OMB periodically selects and manages a limited number of customer life experiences to prioritize for government-wide action to improve customer experience and service delivery, typically in conjunction with
the President's Management Agenda. For OMB-designated Life Experiences, OMB provides a governance framework, program strategy and operations leadership, portfolio leadership, policy consultation, reporting in accordance with E.O. 14058, and support through the President's Management Council (PMC). OMB makes Life Experience charters, portfolio summaries, and project milestones available at https://www.performance.gov/cx/projects/.

The OMB-designated Life Experience framework includes a program structure and an operation cycle.

- **OMB-designated Life Experience structure:**
  - The "program" contains all OMB-designated Life Experiences;
  - A "portfolio" is a single Life Experience (e.g., Approaching Retirement);
  - A "project" is a specific effort within a portfolio; portfolios may contain multiple projects.

- **OMB-designated Life Experience cycle:** The program operates in a four-year cycle broken into four one-year phases:
  - A *Discovery* phase to understand people's experiences and opportunities for improvement,
  - A *Design* phase to build and test solutions;
  - A *Development* phase to scale interventions and productions that work; and,
  - A *Measurement* phase to evaluate and ensure designs are working to achieve outcomes.

To successfully implement designated Life Experiences, OMB requires agency leadership engagement and staff participation within the program structure and across the operation cycle. Agencies shall participate in and contribute to designated Life Experiences in the following ways:

- At the start of each four-year cycle, agencies should recommend Life Experiences for designation.
- Agencies shall serve as stakeholders when a Life Experience intersects with the agency's mission, authority, service, or program.
- The agency PMC Member shall advise on and sign the relevant Life Experience charters.
- Each implicated agency will assign a single agency point of contact (POC) to liaise with the PMC Member and other agency representatives.
- Agencies will provide OMB and the Life Experience teams with input and recommendations, including agency perspectives, concerns, and interests.
- Relevant agencies will evaluate and concur on Life Experience projects for each phase annually.

Per E.O. 14058, the Director of OMB shall work with the head of each relevant agency to resolve issues related to overlapping responsibilities among agencies, address barriers to serving customers across multiple agencies, and coordinate activities to improve customer experience and service delivery.9

---

Coordinating cross-agency and government-wide efforts to improve customer experience

In addition to participating in OMB-designated Life Experiences, agencies must be proactive about initiating and coordinating service delivery for people navigating multiple Federal programs. In all such efforts, agencies should:

- Assign staff and subject matter experts to contribute to portfolios and projects, for example, through full- or part-time assignments, participation in workshops, and attending regular stakeholder update meetings.
- Share resources with each other to improve understanding of customers, including journey maps, service blueprints, and evaluation reports.
- Share administrative data with appropriate privacy protections, including via data-sharing agreements with other Federal agencies.
- Include cross-agency projects, products, and interventions in agency budget submissions and within agency operating budgets.
- Provide states that administer elements of Federal services with guidance and flexibility concerning the aspects of Federal programs they administer, consistent with applicable law and policy.
- Use umbrella clearances for cross-agency customer research and design activities.
- Leverage existing contract vehicles where available and applicable to engage outside entities to support project implementation.
- Align support for Life Experiences and other cross-agency efforts with existing projects, priorities, and goals, including CX Action Plans (section 280.13), Agency Performance Plans (section 220), Equity Action Plans (section 220.22) and Agency Strategic Plans (section 230).

Leading practices for coordinating CX improvement government-wide

Government-wide or cross-agency efforts to improve customer experience should adopt the following practices:

- Prioritize people's lived experiences and perspectives in coordinated efforts to improve customer experience and service delivery.
- Use human-centered design methodologies and multidisciplinary, cross-agency teams to understand a diverse and representative range of experiences and journeys from start to finish.
- Coordinate agency stakeholders and perspectives to select pilot projects, and define short- and long-term target outcomes and associated milestones.
- Include feedback from members of the public throughout the process, including underserved communities, individuals with lived experience, and/or individuals and organizations who interact directly with target populations.
- Identify, assess, and address administrative burdens in customer interactions.
- Leverage pilots and prototype projects to experiment, test, and iterate.
- Evaluate pilot results using evidence-based approaches, such as theories of change and empirical customer research.
- Leverage the insights and results to initiate new solutions or fine-tune existing programs and investments.
- Promote equity and accountability, ensuring that all government services are accessible, reliable, and responsive to customers.
- Share project details, artifacts, and results with the public whenever possible.