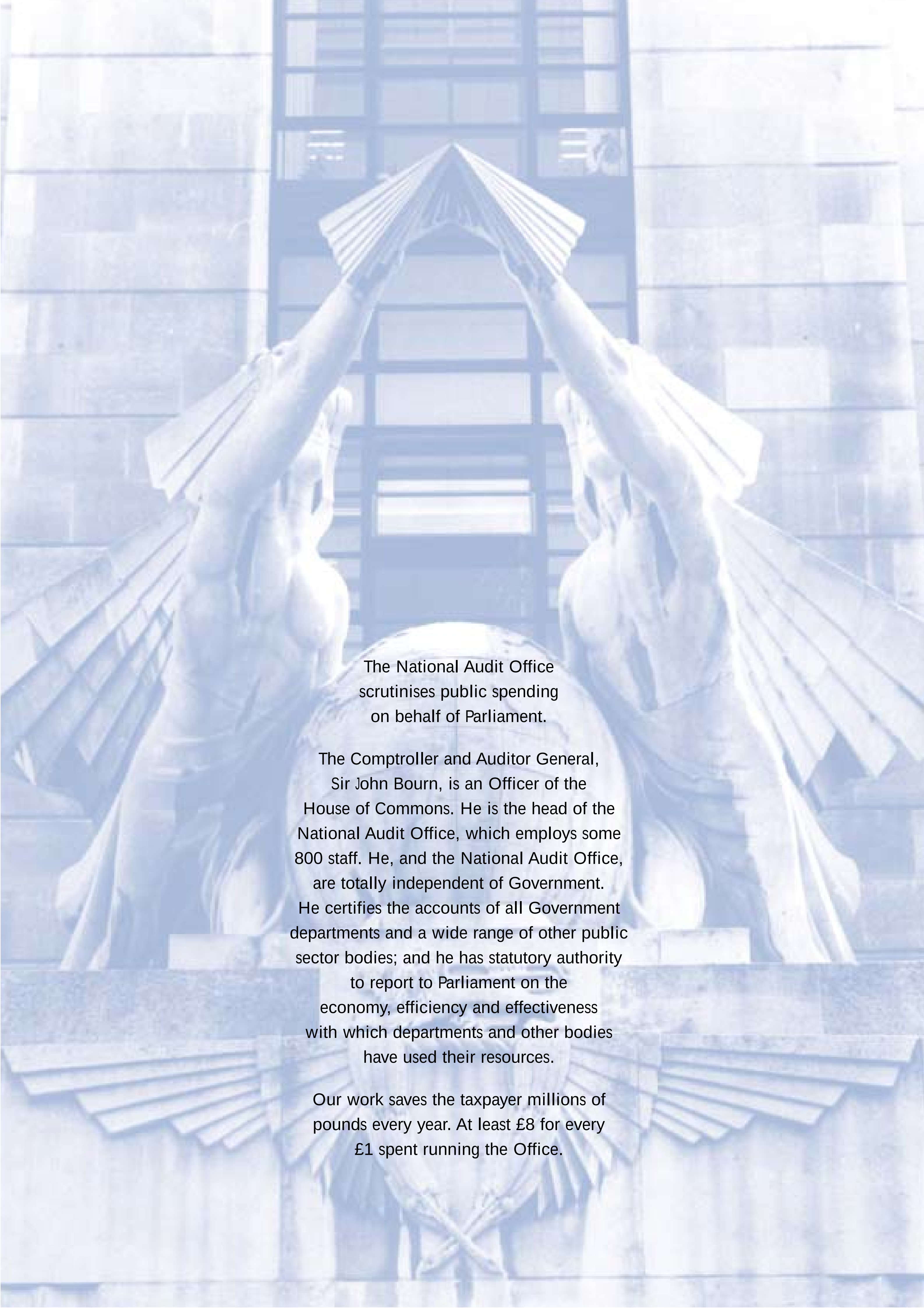
NATIONAL AUDIT OFFICE

LSE

Improving and reviewing government forms

a practical guide



The National Audit Office scrutinises public spending on behalf of Parliament.

The Comptroller and Auditor General, Sir John Bourn, is an Officer of the House of Commons. He is the head of the National Audit Office, which employs some 800 staff. He, and the National Audit Office, are totally independent of Government. He certifies the accounts of all Government departments and a wide range of other public sector bodies; and he has statutory authority to report to Parliament on the economy, efficiency and effectiveness with which departments and other bodies have used their resources.

Our work saves the taxpayer millions of pounds every year. At least £8 for every £1 spent running the Office.

Contents

Introduction

Who should read this guide?

1 This booklet has been written for people working in government departments and public sector agencies (hereafter referred to as 'agencies') with responsibility for forms that are filled in by customers or citizens. We use 'customers' from here on to mean a whole range of ordinary people, (such as 'taxpayers', 'service users', 'people seeking licenses', 'benefit claimants' and so on) who deal with government by filling in forms. This guide provides practical advice on assessing how easy your current forms are for customers to fill in. We also provide detailed advice on how to undertake research into changing your forms or bringing in new forms.

2 Chapter 1 sets out a large number of form features that most commonly cause customers to have problems. This section is designed to help you assess your current form (or a proposed new form) quickly. By providing a checklist of things that many people find difficult, it may also help you identify opportunities to make forms simpler and easier to use. Chapter 2 then explains current good practice on how to review the forms issued by your department or agency. We recommend that you employ at least two or three different research methods here, and provide a simple introduction to what each method can and cannot do. The Appendix gives a full list of the key features that make forms difficult or easy to fill in.

Background to the guide

3 The guide draws on the best practice for monitoring and researching forms, which was observed among departments and agencies while undertaking the study leading to The Comptroller and Auditor General's report: *Difficult Forms: How government agencies interact with citizens,* HC 1145, Session 2002-2003, (London: The Stationary Office, 31 October 2003).

4 This study is the first full-scale analysis of government forms since the early 1990s. It examined how departments and agencies review their forms and which aspects of government forms customers find problematic or straightforward. It includes a comprehensive census of all citizen-facing forms issued by central departments and agencies and analyses their key characteristics. The study also focused in detail on six major government forms, filled in by more than 20 million people a year. Citizens' views of government forms were garnered using qualitative research, including focus groups involving more than 200 citizens in three regions of the country.

The *Difficult Forms* report draws out the main lessons from that analysis and sets out recommendations that should enhance the usability of government forms in general.

5 The *Difficult Forms* report, plus summaries of the results of the focus groups and of the census of forms, are all available free of charge at **www.nao.gov.uk** (follow the links to 'Publications'). Alternatively the report and supporting research can be downloaded from **www.GovernmentOnTheWeb.org**. Further electronic copies of this guide in PDF form may be downloaded free from the same two Web sites, and the electronic versions of this report may also be freely copied and circulated.

6 Both this guide and the *Difficult Forms* report were developed for the National Audit Office under contract by a team from the London School of Economics and Political Science (LSE) and University College London (UCL), led by Professors Patrick Dunleavy and Helen Margetts, and including Simon Bastow, Françoise Boucek and Rosie Campbell. The team thank staff at COI Communications for many helpful comments incorporated here.

Checklist of difficult features

1

1.1 Based on the *Difficult Forms* research, this section provides a checklist of features that most often cause customers to have problems with filling in government forms. It has been developed to:

- allow you to make a systematic and comprehensive evaluation of each of your forms; and
- give you the tools to consider the overall level of difficulty of each of your forms.

Running through the checklist may also be helpful in triggering ideas of features in your forms that might be simplified or implemented in different ways.

Features in the checklist

1.2 Some of the features in the list below are easier to change than others. Relatively straightforward things to alter might include (for instance) the quality or types of help available to customers or the detailed language used in the form. Some other features that may cause difficulty for customers may actually be unavoidable within the context of a department or agency's work, such as the inclusion of a photograph in a passport application. But even here it is as well to recognise from the outset how many features of a form may create problems, even if some of these features cannot be changed. Not all of the features in the list are relevant to all departments and agencies.

How to use the checklist

1.3 Use this checklist to evaluate the difficulty to your customers of each of your forms:

- Place a tick in the 'True of this form' column if your form displays that 'difficult feature'.
- Assign values in the 'Weighting' column to features according to whether they are more or less important to that form's customers (in the light of your own research and feedback processes on your customers' requirements). It is probably best to choose a simple number system for weighting, for example, you might weight difficult features that will be very important to your customers as 2, and less important features as 1.
- Add up the weighted values of the ticked features.
- If the total score is over 70 then it is likely to be difficult for your customers to fill in but if the form scores well under 70, say 25, then it is reasonable to expect your customers to find it relatively straightforward.

Determine whether it is feasible to improve the form by seeing whether the elements that contributed to the difficulty score can be made less difficult. You can also perhaps compare how your forms scores against another form that you issue or against a form issued by another agency with a quite similar role. The census of government forms provided at the NAO website (see above) provides other information to allow you to compare your form with other forms issued to citizens across central government.

THE CHECKLIST OF DIFFICULT FEATURES

FUNDAMENTALS	True of this form	Weighting
1 The form is compulsory. Citizens have no choice about whether to return it.		
2 The form provides no direct benefit to the customer (e.g. it does not give access to a license or help the customer claim a welfare benefit).		
3 The form may lead to a financial loss for the customer (e.g. paying a tax).		
4 The form will give extensive new information about the customer to government.		
5 The form is blank; no significant fields are pre-populated (that is, already filled-in with the customer's details).		
6 The form is multi-purpose, designed for several types of customers. Customers must read questions in detail to work out if they apply to them or not.		
7 The form itself feels bulky and has a lot of pages.		
8 The form has a large number of questions.		
9 The overall form pack (that is, the form ***plus*** all the guidance sent with it) looks bulky, as if it will take some time to read and fill in.		
LEGIBILITY		
10 The font sizes used are small or vary in size, with type sizes and styles used inconsistently.		
LANGUAGE		
11 The form or accompanying guidance uses complex language (for instance, many multi-syllable words, long sentences, or sentences with many qualifying clauses).		
12 The form includes bureaucratic terms or concepts.		
13 The form includes unfamiliar concepts, or ideas rarely used in ordinary life.		
14 Acronyms are used for key concepts.		
15 Some of the terms used or requirements in questions are ambiguous or unspecific.		
16 The form uses the third person 'the applicant', rather than the second person 'you'.		
17 It is not clear who the subject of each question is (e.g. who is the applicant).		

SPACING	True of this form	Weighting
18 It is not clear which spaces to use for some answers.		
19 The spaces or boxes for answers are too short to		
SEQUENCING		
accommodate the answers needed.		
20 The form uses several different numbering systems (e.g. for questions, for parts or sections, and for pages).		
21 The sequence of questions is unclear (e.g. the same numbers or letters are used several different times; or not all the questions are numbered; or there is apparently more than one sequence of questions).		
22 Questions use two-part numbers (e.g. Part A, question 2); or the questions use numbers with decimal points (such as, question 1.10)		
23 The form requires customers to enter the same (or very similar) information more than once.		
24 The sequence of questions in the form is relevant to government officials or agency IT systems, rather than to customers.		
25 The logic of the question sequence is hard to follow.		
26 Customers are given complex routing instructions (for instance, fill in some questions, then skip others, then fill in some more questions).		
27 Questions aimed at many customers are mixed in with questions aimed at few customers.		
28 The form asks for information in an unfamiliar order.		
29 The form requires customers to take special care in entering familiar information.		
CALCULATION		
30 The form requires customer to carry out mathematical calculations.		
ID or DOCUMENTATION		
31 The form requires an ID number.		
32 The form requires an unfamiliar or esoteric ID number (one that customers do not use regularly but have to look up on another document).		
33 The spaces for ID numbers do not match the number of digits in the ID itself.		

ID or DOCUMENTATION continued	True of this form	Weighting
34 The form requires customers to include other documentation.		
35 The form requires witnessing or certification of the customer's signature by someone else.		
36 Customers must include a photo.		
37 The photo must be certified or witnessed by someone else (especially a particular kind of person, such as a 'person of standing' or a professional).		
38 The certification must be written on the back of photo, but the text is too long to fit.		
THREATS		
39 The form threatens legal penalties for false or inaccurate entries.		
40 The form threatens financial penalties for false or inaccurate entries.		
41 The form threatens administrative delays or investigations for false or inaccurate entries.		
COGNITIVE REQUIREMENTS		
42 Questions require customers to remember or find detailed information about times long past. (For example, an open-ended question asks 'Have you ever lived abroad?').		
43 Questions require customers to make subjective judgements.		
CONFIDENTIALITY		
44 The form asks for sensitive personal or financial information.		
45 The form says that information supplied will be shared with unspecified other government agencies.		
46 The form provides no clear assurances to safeguard confidentiality - for instance, there is no statement of privacy policy or no assurance that use of the form will comply with the Data Protection Act.		
GUIDANCE PROVIDED		
47 The first page of the guidance leaflet does not preview what you will require to fill in the form.		
48 There is no 'quick start' section at the beginning of the guidance, designed to help people start filling in the form with minimum fuss.		

GUIDANCE PROVIDED continued	True of this form	Weighting
49 Customers are advised to read all of the guidance before they start filling in the form.		
50 The guidance is given in a separate document (rather than on the form itself).		
51 The guidance provided is split over two (or more) separate documents.		
52 Some of the guidance is on the form itself and the rest is in a separate document.		
53 The guidance is provided all in text form - there are no photographs, diagrams, icons or graphic devices. The text is bulky.		
54 The guidance leaflet or booklet is lengthy or difficult to follow, with no attempts to make it easier to read.		
PHONE AND WEB FACILITIES		
55 The form cannot be ordered or requested over the phone, but must be requested in writing or by mail.		
56 The form cannot be completed over the phone.		
57 No help is available over the phone on how to complete the form.		
58 Phone help or advice is available, but the phone helpline number is buried in the guidance, and not on the form itself.		
59 The phone helpline number is given only once or is not prominent.		
60 Phone advice is available but the form is so long or complex that giving the advice may take a long time.		
61 The form cannot be completed and submitted online, over the Web.		
62 The form cannot be downloaded from the Web.		
63 No guidance or advice is available on the Web on how to complete the form.		
RETURN FEATURES		
64 The form has no return envelope or address label, so customers must write out the return address themselves.		
65 The return address is hard to find or not obvious.		
66 More than one agency address is included on the same form, or in the form and the guidance.		

RETURN FEATURES continued	True of this form	Weighting
67 The return address is given at the beginning of form, rather than at the end.		
68 The form ends with no phone number for checking fees or documents needed.		
69 The form ends without any checklist or reminders of things to send back with it (such as, fees, documentation, etc).		

1.5 *The Appendix* to this guide gives another version of this checklist, this time contrasting the features that make forms difficult for customers to fill in with the features that make them *easy* to fill in. If there are any items above that are not immediately clear, or if you are unsure whether an item above applies to your form or not, it will be worth turning to the Appendix and checking the difficult versus easy features for clarification. In a few cases there are also some features that were classified as intermediate. All the elements here and in the Appendix were identified as features that cause customers problems from the original research for the *Difficult Forms* report. Part 3 of the report gives examples of some good and some less good features of current government forms.

Key methods for reviewing forms

2

2.1 Major forms need to be kept under review to monitor any emerging problems and to take advantage of opportunities to make small-scale or low-cost improvements. And at least every three to five years, forms should be reviewed in a more thorough way.

2.2 Designing a major form - one that will help constitute the bedrock of administrative processes for a period of years - is a major investment. The way the form is laid out often has implications for how agency offices work, the training of staff and the design of IT systems. Once an investment has been made, agencies are understandably reluctant to envisage redesigning forms, and possibly having to rearrange these other organisational aspects. Sometimes agencies are also worried that asking customers questions about their forms will trigger a great deal of criticism, which could not realistically be met.

2.3 But if forms are not regularly reviewed then agencies may be imposing unnecessary compliance costs on their customers, as well as incurring administrative costs through customers making mistakes, forms being sent back or rejected, or forms being sent in badly completed which triggers incorrect decisions or appeals. In addition, agencies should look at their forms regularly to check whether redesigns of forms can be used to save money and improve efficiency. Lastly forms impose 'compliance costs' on customers and citizens, the more difficult they are to complete the more time and trouble that citizens must incur to fill them in. Forms are a very important way in which citizens form an impression of government. Leaving forms unrevised for more than a few years, so that they become old-fashioned or look off-putting with uncorrected mistakes and problems, will contribute to customers having a poor image of the agency, and perhaps of government in general.

2.4 In terms of their fundamental set-up and objectives, there are two main ways of reviewing forms and they often produce rather different results:

- 'Regular' or normal reviews are open-ended, re-examining the form for feasible improvements with no particular or pre-defined object in mind. Regular reviews commonly produce relatively small or piecemeal changes.
- 'Re-engineering' reviews are set up with a definite initial objective (such as 'reduce the form length by half' or 'cut the time taken to complete the form by a third'). They then focus attention on ways of getting the objective implemented. Re-engineering reviews will often result in more radical or more clearly visible alterations of a form's overall style and approach. For instance, improvements in agency IT capabilities may mean that less 'repeat' information about customers needs to asked for and collected using forms. The *Difficult Forms* report gives examples of where radical reductions in some form requirements have recently been achieved.

2.5 Conducting a review might seem a relatively straightforward operation but there are a number of factors that you need to consider before undertaking it, including:

- Design of the review process
- Review team
- Research methods.

Design of the review process

2.6 The design of the review process can have major implications for the expectations of the official participants. Looking only at one kind of information may create 'blind spots' - aspects of forms which cause difficulties for substantial numbers of customers but which are not visible to officials. Discovering the root causes of problems (and even more how they might be corrected) may also need concentrated attention to 'weak signals'.

2.7 If reviews are always focused on small-scale or incremental changes, then officials involved in the process will tend to screen out feedback or comments that relate to much broader issues, seeing them as unhelpful for the task in hand. For example, if the focus of the review process is on detailed question wording or the layout of questions on the form, then officials or social researchers working for the agency might easily marginalise comments that the form itself is just too long and has too many questions. It is important that any review process should be open to new information, even if what customers say is unexpected, inconvenient or unwelcome.

2.8 It is also important that all aspects of a form's process should be reviewed periodically at the same time, including:

- the design of the form questions;
- the relationship between the form and any guidance notes or leaflets;
- how customers obtain forms; and
- the relationship between paper and electronic forms.

2.9 Other aspects, such as a requirement to supply photographs, witness statements or other supporting documents or information, also have a bearing upon how difficult customers will find forms to complete. The availability of help over the phone or on the web may also be important.

2.10 There are many advantages if the review process can adopt an end-to-end approach, rather than focusing on only a part of a form. Sometimes there may also be advantages to reviewing a set of related forms together.

Review team

2.11 The forms review process should be undertaken by a team of officials, and bring together relevant expertise from across the agency in a joined-up way. If the review is undertaken by only one person or only one section within the agency, then the reviewers may well not have information on aspects of the form design which lie outside their area of competence. Sometimes, for example, agency staff who do marketing or public relations are aware that there are problems with an aspect of a form but believe that this aspect is made necessary by procedures in the agency's field offices. Yet staff in these offices may also be aware of the problem and believe that it stems from an aspect of the agency's IT systems that cannot be changed. Bringing together someone from marketing, from the field offices and from the IT division might clarify that the problematic aspect of the form can be changed.

2.12 A key dimension of the review process is the level of independence enjoyed by the review team, and by any researchers working for the agency. If the forms review is seen as just part of the normal committee system within an agency, then officials representing different sections may take part in a rather defensive or reserved mode. They may look out narrowly for the interests of their section or try to fit in with what they see top managers as wanting. By contrast, if the team reviewing the form has a clear brief to pursue improvements and is licensed to report back findings or suggestions for changes that may be initially unwelcome, then more helpful feedback may be obtained. Where an agency employs outside researchers (such as a market research organisation or university researchers) to help them secure improvements, the work of the external team may also be influenced by the perceived scope of change that they see the agency as wanting.

KEY LESSONS

- 'Re-engineering' reviews, carried out with specific targets for improving forms in view, will tend to generate ways of achieving more significant changes. 'Normal' reviews focusing only on small design or layout changes will tend to generate only incremental changes.
- How a monitoring and review process for a form is set up often influences the kinds of changes considered. An end-to-end review looking at all aspects from initial design to final processing will generally be the most useful.

Research methods

2.13 The rest of this chapter is devoted to an analysis of the social research methods that can be used to review forms. There are seven main methods that you can use to help assess your forms, each of which has some strengths but also considerable limitations. We review each of them in turn:

- Monitoring implementation of the form
- Unobtrusive measures
- Stakeholder feedback
- Surveys
- Focus groups
- Usability analysis
- Piloting forms.

2.14 A lot of agencies assume that if they need to find out information on how their forms are doing they must automatically commission a special survey. But this option comes some way down our list above for a good reason - there are other tools that can be used more cheaply (first three items above). And amongst the more expensive tools (last four items above) surveys are only one alternative.

Monitoring implementation of the form

2.15 Any well-organised agency responsible for a major form should have in place a range of methods for monitoring how customers are using it and how well it is being administered. New problems may emerge, either in terms of public responses to questions or how staff are processing forms.

2.16 However, it is a common experience across government departments and agencies that staff in different sections of an agency may have different kinds of knowledge about how the form is designed and operated; this information may not necessarily get pulled together across different sections. The larger an agency is, the more difficult it is to ensure effective sharing of viewpoints across teams.

2.17 Many agencies have responded by designating a single, definite person to act as 'forms officer' or 'gatekeeper' for each of their major forms, and to take responsibility for collating information together from a wide range of sources. These may include:

- customer complaints and letters;
- e-mails and comments sent via the website;
- feedback from staff in field offices or from handling customers directly;
- comments made to call-centre staff;
- relevant data from regular market research or general surveys about how the agency's forms are perceived by the public; and
- any media or press coverage relating to the forms reported by the public relations section.

2.18 Sometimes the designated forms officer may also have responsibility for talking on a regular basis to partner organisations that help customers submit the agency's forms (such as the Post Office Counters service). In addition, significant aspects of forms processing are sometimes contracted out to private firms, which implement them on the agency's behalf. Here information about where customers are having problems with forms, or what they say on the phone, may rest with contractors' staff. It may not regularly reach the agency itself unless the forms officer takes responsibility for finding this information out.

KEY LESSONS

- Information about customers' reactions to forms and how forms might be redesigned is often held in different parts of an agency.
- Appointing a forms officer to pull together this information can help agencies take a more joined-up look at their forms.

Unobtrusive measures

2.19 To uncover what customers or citizens are feeling about forms, an obvious approach is to ask them using a survey or a related method where they react to questions asked. But sometimes using a 'reactive' measure may not be as useful as observing how people are actually behaving, because people's responses may be affected by other considerations. For example, if we ask visitors to an art gallery about their favourite picture, they may respond by mentioning a picture that is famous or seems prestigious to name, even if it is not their real favourite. An unobtrusive measure, such as looking at the flow of people through galleries or the level of wear on the carpets in front of different pictures, might give us a more objective view of what people really like.

2.20 Another example of how reactive methods may not be terribly useful is the case of people with literacy and numeracy problems. There are good reasons to believe that around one person in seven has some significant difficulties with reading and writing, and other people may have problems with simple mathematical operations. Asking such people directly about their experience of government forms may not elicit very helpful feedback if they are reluctant to admit to an interviewer that they have problems. Developing unobtrusive measures of form users' behaviour may be helpful, since we do not need to rely on respondents answering directly. There are a number of ways of doing this. The following two approaches are particularly useful:

- Take a large sample of completed forms and analyse any patterns in where mistakes were made. (For example, where did people cross things out or seem to have problems filling in their answers?)
- Record systematically the reasons why forms were rejected or sent back to customers for more information, and the kinds of questions or topics that people ring helplines about. It can be helpful even to record the items about which customers make adverse comments to call-centre personnel or to front-office staff.

KEY LESSONS

- Agencies often already have key sources of information, but lack ways of systematically recording or analysing it. Unobtrusive measures generate information without customers having to be surveyed or 'react' to questionnaires.
- Putting in place regular analysis or recording systems to monitor customer behaviour and comments requires some initial investment. But moving from anecdotal reportage to definite numbers will normally be worthwhile for major forms.

Stakeholder feedback

2.21 Agencies can learn a lot about their forms from consulting stakeholders, especially interest groups representing their customers or relevant groups of citizens. For many longer government forms, a range of intermediary bodies may be involved in assisting customers to complete them. These groups include charities, voluntary bodies, local authority information services, social workers or care workers, and private sector intermediaries such as lawyers and accountants.

2.22 Comments from such stakeholders can have limits on their usefulness. Sometimes intermediaries may appear over-critical, exaggerating difficulties or being too eager to point out problems that are relatively tractable. At the other end of the spectrum, however, some intermediaries may acquire a vested interest in forms being difficult to use, thereby creating a role for their organisation in helping citizens cope with the paperwork. In this case, intermediaries may be less critical about difficult forms than are customers themselves.

2.23 The importance of consulting stakeholders, however, is that it will normally be very difficult for agencies to reflect fully the diversity of interests and points of view in modern society, where large groups of citizens speak languages other than English, have disabilities, and live in very different sets of circumstances. Often the reactions and needs of people with disabilities, in different language groups or with different cultures cannot be easily anticipated by agency officials - stakeholder organisations have valuable expertise in such areas. Consulting stakeholders also makes it more practicable for agencies to broaden the range of viewpoints they can consider.

2.24 In general, outside stakeholder organisations may also recognise new or unexpected problems coming up with forms or agency processes somewhat faster than agency officials themselves. And even where outside bodies' feedback may occasionally be over-zealous in identifying problems, the criticisms made are rarely without some important foundation that merits attention.

KEY LESSONS

- Agencies can broaden the viewpoints they consider by asking stakeholders and intermediaries about their forms.
- Stakeholder and intermediary comments can sometimes reflect biases, and so need to be considered against other information.

Surveys

2.25 Since the 1999 *Modernising Government* White Paper, where emphasis was placed on public sector organisations being responsive to customer needs, most departments and major agencies now undertake some form of regular market research, most commonly a survey of their customers or of the general public. For agencies that issue multiple forms, there is often a problem in using a single annual survey to assess how their forms are doing. It is tricky to ask people useful questions about their experiences of an agency's forms in a generalised way, or to ask respondents to rely on their recall of forms that they have not completed very recently. Experience suggests that regular market research of the general population will very rarely generate useful information about specific forms. More targeted surveys are usually necessary.

2.26 With a reasonably large and properly drawn sample of citizens in general, or of an agency's customers in particular, public sector bodies can find out what aspects of their customer services are seen favourably or unfavourably and what their reputation with customers is. In particular, surveys are the only method of discovering what proportion of citizens or customers view the agency in different ways. A professionally designed sample will give results from which officials can infer reasonably accurately the overall numbers of customers who take a particular view of a form or who report a given problem.

Sample design

2.27 There are two main ways of drawing a sample accurately. A *probability sample* involves identifying which respondents to approach (via the telephone or in person) using a random number approach. This is generally the most technically accurate method, but it is also more time-consuming to do (with interviewing taking longer) and much more expensive. In general, probability samples may only be justified for very detailed or lengthy surveys. Otherwise *quota samples* are the main approach. The survey researcher specifies in advance the numbers of interviewees with different social characteristics that will be needed to reflect the population as a whole in the most important respects. Quotas for different types of people in different localities are set, and by this means, a sample design is constructed that is socially representative. Interviews are then sought on a random basis within the survey locations, but are accumulated to make up the quotas. Once collected, data can also be re-weighted in a detailed way to give a more complete fit with the social structure of the population as a whole.

Types of survey

2.28 Surveys about forms can be undertaken in five main ways:

- interviewing people in the general population face-to-face (usually at home, but perhaps in the street for very short surveys);
- face-to-face interviews with respondents at agency offices, for instance, covering people who have just filed applications or are sitting in agency waiting rooms;
- phoning citizens or customers at home, which will work best if interviewers can talk to people who have just been sent forms to complete or have only recently returned them;
- mailing out questionnaires to customers, asking them to complete one and return it; or finally
- contacting people via the Internet and asking them to complete and return an electronic questionnaire.

2.29 Face-to-face interviews are the most expensive to undertake since the interviewer has to move to the right locations to collect a random sample of people. But there are advantages, such as the ability to show respondents the form and get specific reactions. Interviewers can also ask long questions in person than can be done over the phone, where questions must be shorter and less complex. People answering questions about forms over the phone also cannot be shown what the interviewer is talking about.

2.30 Mailing out or giving out surveys for respondents to post back is the cheapest method, and such surveys can also include a copy of the form or illustrative materials drawn from it. But the numbers of questionnaires returned via this method is often lower or much lower than with other methods. Researchers often have least control over who replies with these self-completion questionnaires, so that problems of bias in the sample may be worse.

2.31 Finally, surveys can be conducted over the Internet, especially appropriately on issues like developing electronic forms or how to improve the agency's website. Again customers can be shown form materials or asked to decide which layout is clearer using this approach.

2.32 For all survey approaches, the quality of the sampling of the population achieved is critically important to the conclusions that can be drawn. The most general problem here is *selection bias* - the possibility that the people who are contacted and respond to the survey may be systematically different in some key respect from those who are not contacted, or from those people who are contacted but who either do not reply or decline to be interviewed.

2.33 The people who respond to surveys about a particular form may be those most interested in doing so, perhaps because they had a good experience of completing the form and dealing with the agency, or perhaps because they had a particularly bad experience. People who found a form easy to complete may be happiest to talk about that. But people who found a form difficult (especially because of poor literacy or numeracy) may not want to admit to an interviewer that this was the case. Mail-back surveys posted or handed out to customers will normally have the biggest potential problems of selection bias, with a tendency for the most satisfied and better educated customers to be most likely to send back replies. Web-based or Internet surveys may also not give a very good picture of the population as whole, since only half of all UK residents currently have Internet access (in 2003).

2.34 To counteract the possible effects of selection bias, agencies (or their research firm) should carefully check the characteristics of survey respondents against the characteristics of the population which they are trying to understand. If the people responding to the survey match the social profile of the people who complete the agency's form closely, then the results should be reliable. Any remaining small differences can also be controlled for by re-weighting. This approach works fine for social characteristics or geographical locations, where we know in advance what proportion of people fall into different groups. A group which historically has higher levels of not participating in surveys, or where officials have good reason to believe that they face more difficulties filling in forms, might be over-sampled for. But it is far harder to control in advance for people's preferences and attitudes, which are often intangible and difficult to pin down. Hence the distribution of attitudes (for instance, how many people find our form difficult?) may not be known for the population as a whole. For good reasons respondents may also hide information about themselves from surveyors - for example, not admitting to having literacy or numeracy difficulties, which will defeat efforts to over-sample this group.

2.35 If you see a risk that severe selection bias may be present, it can sometimes be useful to think about getting data from two or three smaller samples, rather than relying on just a single large sample. For example, responses to a large mailed-out survey on a form might be checked by doing a phone survey with a smallish sample, just focusing on some of the most important questions, to see if the phone sample diverges from the responses from the self-completion questionnaire.

Interpreting survey results

2.36 All surveys give an instant snapshot view of how people are feeling about something at a particular point in time. They often do not tell you much about how people will react to changes in a form or being given new options for returning forms. Respondents talking to an interviewer face-to-face or over the phone have little time to think out their position or change their minds, and may well say something immediately that they would revise later on, if given more time.

2.37 Additionally, there is a well-known tendency for respondents to want to say things to please the interviewer. For example, if they think the interviewer works for the agency whose form is being studied, they may tend to please the interviewer by saying that they are satisfied with the form or found it easy to use. (Along with the need to get a properly drawn sample, this is a key reason for having user satisfaction surveys conducted by external market research companies or university researchers: both these types of organisation can come across as more independent to respondents).

2.38 If the questions asked about a form appear to be slanted towards getting a particular answer (that is, they 'lead' respondents) then people's inclination to please the interviewer may produce artificial agreement with the line being taken. So it is very important that any single questions asked about forms should be strictly neutral, making it equally easy or acceptable for respondents to give answers for or against the form. Where you can ask *several* questions about a form (or an aspect of the form) then it is admissible to use slanted statements (inviting respondents to agree or disagree). But this slant should *always* vary equally over a set of questions. In particular, a whole set of questions should never be slanted towards respondents giving pro-agency responses. Any agree/disagree or satisfied/dissatisfied scales should also be equally tough at the disagree or unsatisfied end of the spectrum as they are generous at the agree/satisfied end. Any opportunities for respondents to describe the form or the agency in positive ways (such as 'well-designed', 'very helpful', 'efficient' etc) should be accompanied by equally clear-cut adverse response options ('badly designed', 'very unhelpful', 'inefficient', etc).

2.39 In interpreting results from satisfaction questions, bear in mind that they may often deliver relatively high levels of people saying they are satisfied. Some people may not like to admit that they are dissatisfied, lest they seem to be complaining, critical or impolite. Asking people whether things are difficult or easy to do may also tend to elicit too many 'easy' responses, because adults are normally reluctant to admit to having cognitive problems. And, of course, selection biases may mean that the people who had most difficulty completing the form in the first place will be the most likely to decline to be interviewed, and the most unlikely to spend time completing a mail-back questionnaire about their experiences.

2.40 It is best not to put too much detailed credence on the *absolute* levels of survey respondents who profess themselves to be satisfied or dissatisfied with forms on a single question, or who say that something was straightforward rather than difficult. Survey data will indicate a ballpark level of performance only. In deciding what level of assurance to draw from the absolute levels of 'satisfied' or 'easy' responses in surveys, it can be very useful to look at people's overall responses. For instance, if you can ask several questions about a form (or about each aspect of the form) then check how many people gave positive responses on all the questions, how many were uniformly negative, and how many gave mixed responses, with some positives and some negatives. In addition, try and interrelate the patterns in the survey responses with other information from unobtrusive measures (or internal monitoring of forms by officials). For instance, it is worth cross-checking whether the proportion of actual customers who make mistakes on forms is greater or less than the numbers of survey respondents who say forms are difficult to understand.

2.41 Instead of focusing only on overall satisfaction ratings, it can be most helpful to focus on whether there are *variations* across different types of people in their survey responses, and then to try and track down why some groups are less satisfied or have more difficulties with forms than others. Looking at changes in 'satisfaction' ratings is also very helpful. Always investigate carefully the reasons for variations over time. If dissatisfied responses are increasing, you will need to find out why, which is rarely obvious. And if satisfaction levels are rising, careful analysis is still needed to try and find the reasons, so as to see what more might be done.

KEY LESSONS

- Surveys are only useful if they are well designed and based on good samples. The possibility of 'selection bias' in who responds to surveys about government forms should always be considered, especially for self-completion questionnaires.
- Survey respondents may sometimes not be frank about problems they have with forms, especially on literacy or numeracy issues. And they may want to please the interviewer, so questionnaires must never 'lead' respondents. It can be useful for the survey to be conducted by an independent organisation.
- In looking at survey results, agencies should be cautious in interpreting the absolute levels of responses on satisfaction or ease of use. Variations between different groups of people in these responses are often more interesting information, and they should be carefully analysed.

Focus groups

2.42 Running a focus group is not a very difficult or costly thing to undertake, but this approach has not been used as much as survey research by government agencies. A focus group involves recruiting a set of 8-12 people to talk about a form in some detail (usually for an hour or 90 minutes). Because focus groups are so small they can never be more than very roughly diversified and they are therefore never typical of large social groups. The point of a focus group is not to try and secure a miniature cross-section of the populace at large, but instead to have a deliberative discussion where people have a chance to think about their reactions, to comment discursively and to listen to other people's views. The respondents should normally come from a particular section of the population (for example, in terms of age, or gender, or blue-collar versus white-collar jobs versus unemployed people). Alternatively the groups might consist of one type of people filling in a particular form. As a result, you may need to run several focus groups per form. Trying to have a single group be a rough cross-section of the whole population is very difficult, and the people present may be too dissimilar to generate easy and fruitful discussion - which is the whole point of the exercise.

2.43 Agencies may need to use consultants to contact potential participants and bring them together, as well as to provide a facilitator and record and analyse discussions. The costs can be kept down by agency staff contacting and assembling customers themselves, and by developing the fairly simple skills involved in running a group (see below). Focus group participants are normally paid a small fee (in the range from £20 to £50 each) for coming to a session, which will usually last 60 to 90 minutes. Many citizens are interested to participate if they are asked in this way. Providing a pleasant room, plus tea, coffee and refreshments, are good investments in getting a useful discussion.

2.44 In studying government forms, focus groups are useful for a wide range of reasons. Any group of customers will have different viewpoints and the discussion amongst them will normally encourage participants to bring in their own diversified experiences. People may be more likely to admit to having a problem at particular points in a form if they can see that other users of the form also had some difficulties there. Group members can also ask questions which highlight how the questions on forms and their layout may often be misconstrued or misinterpreted, often in ways which are unanticipated by officials.

2.45 There are some risks and problems with focus groups that may also arise from their deliberative character. As with surveys, it is important for the people running the focus group to seem independent from the agency issuing the form and to stress that they are interested in all kinds of feedback. The person leading the group, called the 'facilitator', must be neutral in approach, periodically summarising what group members have said about the form, but neither defending the form from criticism by group members nor inviting them to criticise it.

2.46 The facilitator will also need to guard against one or a few group members who are more forceful or articulate dominating the whole conversation and perhaps 'leading' other members into agreeing with their own strong opinions. Instead, they should maintain a balanced set of contributions from different people in the group. It is useful to have a well-organised agenda, such as working through a set of form questions in turn, so as to keep group discussions well-focused and moving along.

2.47 Normally focus group discussions generate a lot of comments very quickly, so that what is said must be videoed and audio-recorded for later analysis. A skilled researcher will be able to tell from respondents' precise language and ways of commenting the extent to which they are happy or unhappy with the form, and how they felt about it. The analyst should also be able to explain the detailed reasons why group participants understood a form's questions in a particular way or answered them as they did. Thus a focus group often provides very rich, qualitative information.

2.48 Because focus groups are deliberative and participants normally give reasons for their answers, they are an important method for building up a behaviourally realistic view of how citizens approach forms. And because the people involved can discuss things and suggest alternatives, focus groups are an especially useful way of assessing how people respond to alternative design options or question wordings. Where surveys give an unexplained snapshot view, focus groups tend to give far more and deeper insights into the dynamics of citizens' reactions.

KEY LESSONS

- Focus groups are deliberative discussions amongst a small group of participants, which can provide detailed insights into how and why people find forms difficult.
- Focus groups are never typical of the population. The discussion may illuminate how a range of viewpoints work, but it cannot show in a detailed way how many people hold each view.
- Focus groups are among the best ways of collecting customers' views of possible changes to a form.

Usability analysis

2.49 Some large firms and agencies use this technique for analysing in detail how customers complete their forms. Small agencies should be able to find consultants who can offer a similar sort of service. Usability analysis is an intensive approach but only needs to be employed with a small number of customers (fewer than 20) to obtain results.

2.50 The approach works in the following manner. A small number of different types of people are asked to complete the form individually under laboratory conditions. They are usually provided with a set of pre-prepared documents or personal details (for a hypothetical person) that they need to complete the form with. The subjects are then videoed to see how they personally go about the task, and their video is analysed to see what they looked at, what order they did the questions, what they wrote in, which of the supporting documents or guidance they looked at, and so on. After completing the form, respondents are also interviewed about what they did and how they felt during the experience.

2.51 Interpreted by skilful staff or an experienced consultant, this approach reliably generates a large amount of useful information about improving the detailed design of a form, such as the way the form is laid out, the kinds of wording used, and the sequence in which questions are arranged. However, this kind of research is a little bit artificial, because the subjects are given all the information they need in advance to complete the form. So the approach bypasses the problems which more disorganised customers and citizens can face in assembling the information needed to complete forms. In addition, the focus of usability research is on details - it will rarely give an overall view of how customers feel about the forms they are completing. And like many other methods, the technique may not often pick up on the problems faced by people with poor literacy or numeracy (who will tend not to volunteer for such activities).

KEY LESSONS

- Smaller agencies without dedicated forms design sections can obtain usability analysis expertise from consultants.
- Usability analysis can give agencies detailed information about the design of their forms. It can especially help to improve layout, question wording, etc. as a tool for redesign. But it should not be used to evaluate a form for problems.

Piloting forms

2.52 Many agencies undertake extensive pilots of brand-new or redesigned forms in particular areas or regions of the country, before adopting them nationwide. Piloting is always a useful precautionary step to take. It allows officials to check how the form works with customers under field conditions, and assess where problems still remain or where new difficulties may have been introduced. It also allows agencies to check how their back-office systems will cope with the new layout and procedures, and to see if the new or redesigned form produces the level of compliance needed from customers.

2.53 But undertaking a very extensive pilot (for instance, with many thousands of forms) can also create some avoidable problems. Some agencies are very cautious and conduct super-large pilots, or convert half the country into a 'pilot zone' for a year or even two years. Here the numbers of forms completed may be so large that just processing them becomes the dominant task and the data from the pilot is not really amenable to much analysis. Sometimes pilots are undertaken but are not actually analysed in detail - a whole region's forms are completed but only anecdotal evidence about how easy customers find them is collated from officials in field offices. Especially with forms issued once a year, carrying out a very large pilot late on in the process may lead to extending the 'time to market' by up to two full years for new forms (or new versions of established forms). If at all possible, therefore, it is best to envisage building a rapid pilot with a sufficiently large sample into the timetable for a new form (or a redesigned version) from the outset of the design process. The number of forms piloted and the locations where pilots take place should be sufficient to show variations in customer responses and back-office processes, but not so large that the results obtained cannot be closely analysed using systematic research methods.

KEY LESSONS

- Piloting new forms before they are adopted nationwide is an essential precautionary step in understanding customer responses to, and the administrative implications of, form changes.
- Properly planned form pilots should be built into the timetable for new and revised forms at the outset and should not unreasonably lengthen their 'time to market'.
- The size of pilots should be large enough to show significant variations but kept manageable enough for the results to be carefully analysed.

Conclusion

2.54 In order to assess a major form - and to think clearly about the extent to which it needs to be changed or improved, or shortened or re-orientated - it is usually important for agencies to employ three or four of the methods considered here. This will ensure that you have a full picture of the usability of your form, and that the evidence you have collected is sufficiently robust. At first sight this may sound a lot. But every agency should already have its own developed way of monitoring its major forms. And where large numbers of customers are filling in a form, developing unobtrusive measures is usually also worthwhile. Most agencies will also consult stakeholders, although these discussions may not regularly focus on forms.

2.55 It is important for agencies to make sure that they are not neglecting the opportunities to improve their information. It is unwise to put all your eggs in one basket when trying to understand how customers and citizens complete their forms and when trying to understand where problems exist or improvements can be made. So some of the less usual methods - surveys, focus groups, usability analysis and more systematically consulting stakeholders - can each contribute different types of information. Above all, no one method is without its problems and limitations, so that interrelating evidence generated in several different ways (sometimes called 'triangulation') is the most useful and robust way of proceeding.

- There are seven main research methods that may be used to assess forms. It is most useful to use a combination of at least two or three different methods.
- Agencies should not rely solely or even primarily on surveys for assessing forms, but make full use of unobtrusive measures and other cheap ways of generating information.
- Focus groups will almost always be useful in evaluating and improving government forms and they are relatively cheap to run.

Appendix

The full checklist

Difficult	Intermediate	Easy
FUNDAMENTALS		
1 Form is compulsory		Form is voluntary
2 Form provides no direct benefit to the customer		Form delivers something they want or need to the customer
3 Form may lead to financial loss for the customer, e.g. paying a tax	Form gives access to permission or official token (e.g. a licence)	Form leads to financial gain for the customer (e.g. benefit payments)
4 Form gives extensive new information about the customer to government		Form gives little or no new information about the customer to government
5 Form is blank; no significant fields are pre-populated	Form is partly pre-populated	Form is extensively pre-populated with information
6 Form is multi-purpose for multiple types of customers; customers are not segmented		Form has a single purpose for a single group of customers; customers are segmented
7 Form itself feels bulky and has a lot of pages	Form has few pages	Form feels thin and has only one or two pages
8 Form has a large number of questions		Form has a small number of questions
9 Overall form pack (including guidance) looks bulky, as if it will take some time to read and fill in		Overall form pack looks slim and quick to fill in
LEGIBILITY		
10 Font sizes are small; difficult to see what each font is used for		Uniformly readable font size
LANGUAGE		
11 Complex language (e.g. many multi-syllable words, long sentences with many qualifying clauses)		Plain language
12 Form includes bureaucratic terms		Form uses only ordinary language terms
13 Form includes unfamiliar concepts		Form uses only familiar concepts
14 Acronyms are used for key concepts		No acronyms used
15 Some terms and requirements in questions are ambiguous or unspecific		All terms and requirements in questions are precise and straightforward
16 Form uses third person 'the applicant'		Form uses second person 'you'
17 Not clear who the subject of each question is (e.g. who is 'the applicant'?)		Clear who the subject of each question is

Difficult	Intermediate	Easy
SPACING		
18 Unclear which spaces to use for some answers		All answers have clearly indicated space to fill in
19 Spaces or answer boxes are too short to accommodate the answers	Spaces or boxes are long enough to accommodate the answers needed	One space is available for each letter of the answer, and plenty of spaces
SEQUENCING		
20 Form uses several different numbering systems (e.g. for questions, parts and pages)		Single numbering system
21 Sequence of questions is unclear (e.g. same numbers or letters used several different times; not all the questions numbered; one question sequence looks different from another)		Single, clear sequence of questions
22 Questions use two-part numbers (e.g. Part A, Q2); questions use numbers with decimal points (e.g. 10.5)		Questions use a single section of numbers (e.g. 1 to 30); no decimal numbers
23 Form requires customer to enter the same information more than once		Form requires customer to enter each piece of information only once
24 Sequence of questions in the form is relevant to government officials or agency IT systems		Sequence of questions is relevant for customers
25 Logic of questions sequence is hard to follow		Question sequence is logical and straightforward
26 Complex routing instructions (e.g. fill in questions 1-8, then go to Q. 15, and then Q.22)		Simple routing instructions, no skipping questions
27 Questions relevant for all or many customers are mixed in with questions relevant for few or very few customers	Filter questions are used to try and ensure that customers don't have to read groups of questions that are not relevant for them	Questions relevant for all or most customers come first; questions for very few or few customers come last
28 Form asks for information in an unfamiliar order (e.g. required order of first name and surname may be culturally unfamiliar)		Form asks for information in a familiar order
29 Form requires customer to take special care in entering familiar information		No special care is required to enter information

Difficult	Intermediate	Easy
CALCULATION		
30 Form requires customer to carry out complex mathematical calculations	Form requires non-standard or unfamiliar calculation	No calculation required; calculation required is very simple or familiar
ID or DOCUMENTATION		
31 Form requires an ID number		Form does not require an ID number
32 Form requires an unfamiliar or esoteric ID number, one customers rarely use (e.g. Passport number)		Form requires only a familiar ID number, regularly used (e.g. car number plate or National Insurance number)
33 Spaces for ID number do not match digits in the ID itself		Spaces for ID number match digits in ID
34 Form requires customer to include other documentation		No other documentation required
35 Forms requires customers signature witnessed or certified by someone else		Form requires signature only
36 Form requires customer to include a photo		No photo required
37 Photo must be certified or witnessed by someone else with special qualifications (e.g. a professional person, or a person of standing in the community)	Photo is required to be certified by someone else, with no special qualifications (eg a friend or neighbour)	Photo is not required to be certified
38 Certification must be written on back of photo, but text is too long to fit	Certification fits on back of photo	Certification must be written on the form, rather than on photo
THREATS		
39 Form threatens legal penalties for false or inaccurate entries		No legal dimension mentioned
40 Form threatens financial penalties for false or inaccurate entries		No financial penalty dimension
41 Form threatens administrative delays or investigations for false or inaccurate entries		No administrative penalty dimension
COGNITIVE REQUIREMENTS		
42 Questions require customers to remember detailed long-ago information		Questions relate only to the recent past
43 Questions require subjective judgements by customers		Answers needed are objective
CONFIDENTIALITY		
44 Form asks for sensitive personal or financial information		Form asks for familiar or non-confidential information only
45 Form admits information will be shared with other government agencies		Clear that the information will be restricted to this department or agency

Difficult	Intermediate	Easy
CONFIDENTIALITY continued		
46 No clear assurances to safeguard customer confidentiality; no privacy policy or details of complying with Data Protection Act		Clear assurances to safeguard customer confidentiality; clear privacy policy and clear statement about Data Protection Act
GUIDANCE PROVIDED		
47 First page of guidance does not preview what you will require to fill in the form the requirements of the form		Guidance previews the requirements of the form
48 No 'quick start' section	Customers referred to 'quick start' section, and then reference section where they need help	'Quick start' section included, designed to help people start filling in the form with a minimum of fuss
49 Customers advised to read **all** of the guidance before they start filling in the form		Little guidance needed - questions are self-explanatory or explained as you go along
50 The guidance is given in a separate document		Any guidance needed is on the form itself
51 Guidance needed is split over two documents		Guidance is all in one document
52 Some of the guidance is on the form itself and the rest is in a separate document		Guidance is all in one place
53 Guidance is all in bulky text format		Guidance uses graphics, photographs, icons or diagrams; text is kept to a minimum
54 Guidance is lengthy or difficult to follow, with no attempts to make it easier to read		Guidance is short and easy to follow
PHONE AND WEB FACILITIES		
55 Form must be requested in writing or by mail		Form can be ordered or requested over the phone or Web
56 Form cannot be completed over the phone	Form may be mostly completed by phone, but customer must supply some elements as hard copy	Form can be completed and signed off by phone
57 No help available over the phone on how to complete the form	Local office help available by phone	Well-briefed call centre help available by phone
58 Phone help or advice available but hard to find details on the form itself or in the guidance	Phone advice and help prominent in guidance only	Phone advice and help prominent on the form itself and in guidance
59 Phone helpline number given only once	Phone helpline number given in several places	Phone helpline number on every page of form

Difficult	Intermediate	Easy
PHONE AND WEB FACILITIES continued		
60 Phone advice is available but the form is so long that advice-giving takes a very long time (hours?)	Phone advice takes more than 20 minutes to cover the form	Phone advice takes only a few minutes to cover the whole form
61 Form cannot be completed and submitted via the Web	Complex online submission process (e.g. electronic ID number must be acquired first)	Online submission is straightforward
62 Form not downloadable from the Web	Form downloadable from the Web only in PDF format, or downloading takes a long time. Form must be submitted on paper	Form easily downloadable in several formats from the Web (e.g. HTML and PDF), but must be submitted on paper
63 No web guidance or advice on completing form	Some Web guidance or advice but not very easy to use or helpful (e.g. large amounts of text)	Form has its own Web pages with user-friendly guidance and advice on how to fill in the form, FAQs (frequently asked questions) etc
RETURN FEATURES		
64 Form has no return envelope or address label	Form has prepaid return address label but no envelope	Prepaid return envelope accompanies form
65 Return address is hard to find or not obvious		Easy-to-find return address
66 More than one agency address included on the same form		Single agency address
67 Return address given once only at the beginning of form	Return address given once at the end of form	Return address given at the beginning and at the end of the form
68 Form ends with no phone number for checking fees or documents needed		Phone number prominent at end for checking any elements needed, such as correct fee
69 Form just stops. No end checklist		Form ends with checklist or reminders of things to send back with it (such as fees, documentation, etc.)

NATIONAL AUDIT OFFICE

Further advice on this guide can be obtained by contacting the following people:

London School of Economics and Political Science
Professor Patrick Dunleavy Tel: 020 7955 7178 Email: p.dunleavy@ise.co.uk

National Audit Office
Mark Davies Tel: 020 7798 7456 Email: mark.davies@nao.gsi.gov.uk
Hugh O'Farrell Tel: 020 7798 7102 Email: hugh.ofarrel@nao.gsi.gov.uk

Layout and Production by NAO Information Centre
Printed by Maxim DG Ref: 3479RF