

Difficult Forms

How government agencies interact with citizens



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executive summary

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- Forms remain essential to the delivery of a wide range of government services. If forms are well-designed and easy to handle, then errors will be fewer and the administrative load is less, leading not only to better access to services but also to considerable efficiency gains. And for citizens, filling in forms is one of the most frequent ways that they interact with central departments, executive agencies and other public sector bodies (hereafter referred to collectively as 'agencies'). Hence forms give people a key window into government. How forms are set out can have an important effect upon how people view the modernization of the public sector. If official forms are badly designed, hard to understand, difficult to complete, and onerous in their demands, then the public are less likely to perceive progress being made towards more responsive and accessible services. We show here that considerable improvements in official forms are now possible.
- For the study we looked closely at five forms that are filled in annually by 20 million people a year, and a sixth form (a ballot paper) which could be used by up to 45 million people every five years (although only 11 million people actually voted at the last opportunity in 1999). We asked focus groups of citizens to give us their views of the forms in detail (see Part 3). Five forms operate on a UK basis, but the higher education form applies in England and Wales only.

Short forms examined	Long forms examined
<ul style="list-style-type: none"> Photocard driving licence application Passport application Ballot paper for the European Parliamentary elections 	<ul style="list-style-type: none"> Income tax self-assessment return <ul style="list-style-type: none"> Attendance Allowance application Application for financial support in higher education

- We also explore the administrative processes lying behind these forms (see Part 2). Processing government forms consumes appreciable amounts of public money. For example, it costs the Driver Vehicle Licensing Agency on average just under £8 each time to process some 6 million driving licences issued annually, at a total cost of £50 million a year (excluding the cost of related services). And an application for Attendance Allowance costs the Department for Work and Pensions just over £40 each, with applications running at around 400,000 annually in recent years. So improving forms' ease-of-use can have important implications for the smooth operation of sizeable administrative operations. Across the two areas above, for instance, a 5 per cent saving in processing costs could generate £3.3 million.

- 4 To put the six forms in a wider context we also undertook a census of all forms issued to citizens by central government departments and agencies, covering 519 forms, spread across all the main policy sectors (see Part 1). Our six case study forms are quite typical of the range of different types of form. They are certainly not in any sense the *most difficult* forms issued by government. Five of them (in one way or another) are in the process of being revised or reappraised by their issuing organizations, while a new photocard driving licence application came into operation during the course of our study.

Key findings

- 5 Central government forms in the UK used by citizens on average require between 40 and 60 pieces of information. Many forms require people to give over 100 pieces of information, especially in the welfare and education fields where forms are much longer than in other policy sectors. UK government forms are often more innovatively and spaciouly designed than those used overseas in comparable liberal democracies. But they are often longer in terms of page lengths (see Annex B).
- 6 In producing forms government departments and agencies have to respond to many different pressures, especially:
- the requirements of legislation;
 - the constraints imposed by the timing of policy changes, especially for annually issued forms;
 - the need to set up sound and robust administrative procedures;
 - constraints and methods of working imposed by existing or planned IT or technical systems; and
 - achieving a balance between accessibility and considerations like preventing fraud and ensuring the integrity of administrative processes.

Long forms in particular often reflect multiple pressures.

- 7 Until recently some agencies seem to have approached the design of forms in a formal and legalistic way, assuming an ideal citizen who conscientiously reads all the information given with a form and can cope with very complex information. Our case studies show that questions on forms are often not independently intelligible, often include long preambles and signature declarations, and are accompanied by very lengthy and complex guidance notes. Guidance leaflets make very limited use of pictures or icons and rarely provide any 'quick start' advice to help citizens complete their task easily. Even the one-time ballot paper we examining included much information that seems inessential, (such as the names of candidates who could only be elected if their party secured 91 per cent support across a whole region of the country).

Box A: An example of good practice facilitating simple and quick start to forms

The Inland Revenue's new Self-Assessment Short Return is being piloted in 2003-5 and may be adopted nationwide thereafter for a large group of taxpayers with simpler affairs. The Short Return cuts the number of pages of the tax return by three quarters for the groups studied here and perhaps somewhat more for other groups. Additional good practice points shown here include the illustrations of how to fill in the form given on the first page, advice on what users should do if they make mistakes in entries, the emphasis upon getting started on the form with simple details, and the use of straightforward vocabulary.

- 8 The three long forms examined here include numerous questions. There is evidence that their burdens could be radically lightened for all or large groups of their users. Changes currently being piloted could mean that some users of the income tax self-assessment form will in future use a short return that has a fifth of the questions currently included on the main return. And applicants for the Attendance Allowance might in future have to tackle a form that is only half the length of the current one. Length reductions are not always attainable. A new version of the application for support in higher education eliminates previous duplication between several forms, but is actually two pages longer than its predecessors. New IT systems mean that it should be easier for departments and agencies to ask fewer questions in forms and perhaps to pre-complete some fields for citizens from existing information. E-forms submitted by the Internet and forms filled in over the phone can also cut the load on citizens, if correctly designed and (for phone forms) if they are kept relatively short.

Box B: An example of what can go wrong in form design

Our focus group respondents had serious difficulty in understanding the logic behind the sequencing of questions in Section 04 of the Passport application form. The Section appears to have filter questions that cut out unnecessary work for the applicant, but in fact the routing means that whatever the answer is to Part A, applicants should go to Part B. The danger is that applicants answer YES to Part A, go on to fill in parents' details, and then forget to go back to Part B. The note in the margin here is designed to help users, but it is awkwardly expressed and difficult to follow. The Passport Service intend to improve this part of the form in a revision to be issued in Spring 2004.



- 9 Some agencies have tended to issue the same form to different user groups, rather than trying to segment their customers into major groups, catered for by different forms tailored to their needs. Using a single form simplifies the agencies' tasks in stocking and processing forms. But it means that citizens often have to scan through many questions and sections that do not apply to them, which considerably increases how complex forms are for users. In three cases our focus groups reported problems of this kind, with the higher education and self-assessment income tax forms and the much shorter but internally complex passport application.
- 10 All of the six case study forms are regularly monitored and reviewed by the agencies and departments issuing them. Good best practice includes regular consumer surveys covering an individual form's ease of use (employed by the Passport Service), detailed 'usability' testing (employed by Inland Revenue), focus groups (used occasionally by the Driver and Vehicle Licensing Agency), design surveys (used in 1999 by the Home Office for the European elections ballot paper) and pilot testing of new versions of forms with large numbers of citizens before implementation (used by four of the agencies).
- 11 None the less, some agencies seem to have serious gaps in their knowledge of who was filling in their forms and how easy or difficult they found the task. In only one of the agencies was it easy to find information specifically relevant for forms in their regular market research. Only one agency had recently submitted its form to independent testing via focus groups, although this is a relatively cheap and easily applied method. For all six forms reviewed here, our focus groups showed that respondents found aspects of the forms difficult to fill in and they quickly highlighted features (in some cases multiple features) that created avoidable problems.

- 12 Two of the forms studied (the applications for a passport and for a photocard driving licence) allow people to pay the Post Office an additional or 'premium' fee for help from their counter-staff in filling in forms. The popularity of this option has risen sharply. Errors on forms submitted via this route are between ten and fifteen times less than among forms posted in by citizens. But a premium fee raises the cost of applications by at least 16 per cent, and it may be being borne differentially by the least well-off and well-educated groups in society.
- 13 Overall, some government departments and agencies have been relatively slow to respond to known problems, with changes made after many years of user dissatisfaction. Agencies have made limited use of research tools and other ways of gathering information on performance (such as focus groups and monitoring of error rates) that are well-recognized in the private sector. Although effort is put into reviewing forms, it can sometimes produce small design improvements within a basically problematic structure of legal, administrative or IT influences. Forms are rarely 're-engineered' in an ambitious way, although the Inland Revenue's Short Tax Return counts as an example of the radical changes that might be achieved with this approach. With new IT systems and e-government processes under way across central government, there should be similar opportunities in other policy areas to streamline many more paper forms and to reduce the load which they impose on citizens. In the meantime our focus group work provides a range of immediate and detailed suggestions for agencies to consider in assessing the burden which their forms impose on citizens. Our good practice document on *Reviewing and Improving Government Forms*, to be published shortly in association with this report (and available free of charge on www.nao.gov.uk and on www.GovernmentOnTheWeb.org) provides detailed suggestions for agencies wanting to evaluate their forms and guidance notes, and to improve them for the future.



Recommendations

14 In terms of their **overall approach**, departments and agencies should ensure that their forms support the government's strategy for modernizing public services. Drawing on good practices already being used by agencies and documented in this study, we recommend that:

- (a) Over time, and consistent with government policy, agencies should aim to minimise the compliance burden which their forms impose on citizens. Modern IT systems and risk-based methods of administration should both make it easier to achieve shorter and simpler forms.
- (b) The accessibility and ease-of-use of major forms should be reviewed at least once every three to five years, bringing together all relevant areas of the agency's operations in this assessment. In the interim a single official or unit should collate information on how forms are performing with customers and ensure that emerging problems are quickly identified and tackled.
- (c) Agencies should seek to radically 're-engineer' forms where there are persistent indications of citizens having difficulty in completing them or complaining that forms are too long, complex or onerous to fill in.
- (d) Agencies should aim to reduce current 'time to market' periods for major improvements in government forms and beware of over-lengthy piloting of changes. Better use of well-established social research methods (such as focus groups) could help cut the time needed and costs incurred to implement major improvements.
- (e) Agencies should bear in mind the *Modernizing Government* objective that citizens should not have to re-communicate information about themselves to an agency that they have previously supplied.
- (f) To achieve longer-run improvements in forms, legal requirements and administrative practices should be simplified wherever feasible, and agencies should guard against new sources of complications in forms arising. Agencies in the welfare and education areas currently have the longest forms, and the greatest scope for improvement.



15 On **detailed forms design** it is important that departments and agencies have a behaviourally realistic view of how citizens complete their forms, rather than grounding their designs on administrative assumptions about how a conscientious citizen should behave. We recommend that:

- (g) Agencies should assess the detailed degree of difficulty involved in their forms using a checklist such as that provided in our good practice guide, *Reviewing and Improving Government Forms*, which will be published soon after this report. It may also serve as an agenda for reviewing systematically where a form could be made more useable.
- (h) Forms themselves should be kept as short as possible, both in terms of the numbers of questions asked and in terms of their number of pages.
- (i) Agencies should tailor forms for large groups of users, so as to avoid people encountering many questions that are not relevant for them. Question sequences should put issues relevant for the largest number of people first, rather than scattering them throughout the form, in amongst questions relevant for very few users.
- (j) Where forms for several users groups must be retained, they should be especially clearly designed, with sections relevant for different groups well-signposted. Different groups of forms users should never be in any doubt about which sections they need to fill in.
- (k) Form designers should recognise that most citizens want to start immediately on filling in a form and will look up guidance notes only if they get stuck. So it is counter-productive to start forms with long preamble texts or to include questions which can only be understood by referring to a guidance booklet.
- (l) So far as possible, forms should be immediately intelligible, so that people can begin quickly, and then encounter questions that are as clear and straightforward as possible, with very brief explanations or help available on the form itself. Technical or unusual vocabulary and 'officialese' should be avoided. Forms should always end with clear 'What to do now' sections including checklists of other elements, such as photos, documents or fees, that must be sent in. Where one form is designed to be completed by several different kinds of users, it may need separate signature and exit points, to ensure that people do not have to scan through materials that are not relevant for them.



Recommendations *continued*

16 On **guidance notes or leaflets** accompanying forms, we recommend:

- (m) Guidance notes should be designed to help people speedily complete forms in the shortest possible time and with minimum inconvenience. Notes should avoid information that is solely there 'for the record'.
- (n) Wherever possible guidance information should keep text to a minimum, and instead use pictures, photographs, diagrams or colour-coding to show people what is wanted - for instance, how to write entries on the form, which sections to fill in on multi-use forms, what documents must be supplied, how photographs should look, etc. (see Part 3).

17 On **joined-up government** we recommend:

- (o) Agencies can make their forms easier to use by developing a common 'look and feel' for how they start and how guidance leaflets are set out. If an agency has several forms and guidance leaflets, that differ a great deal from each other or from those of neighbouring agencies, it should consider if there are strong reasons for being distinctive.
- (p) A central department should consider how best to promote a more similar 'look and feel' for government forms and guidance leaflets across departments and agencies, focusing on the suggestions in paragraphs 14 and 15 above, or on an alternative coherent scheme.

18 On **fees for forms** we recommend that:

- (q) Changing fee levels is a key source of difficulty on forms, with error rates due to incomplete payments increasing after each change. Agencies should carefully assess the benefits and the costs of increasing fees in future, especially given the advent of low inflation economic conditions.
- (r) Premium fee services have evident value for many customers. But agencies should be careful that greater use of such services does not tend to insulate them from appreciating citizens' difficulties with forms. Agencies with premium fee options should research their potential social exclusion effects.