

The Auditor-General
Audit Report No.26 2005–06
Performance Audit

Forms for Individual Service Delivery

**Australian Bureau of Statistics
Centrelink
Child Support Agency
Medicare Australia**

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of Australia 2006

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Canberra ACT
25 January 2006

Dear Mr President
Dear Mr Speaker

The Australian National Audit Office has undertaken a performance audit in the Australian Bureau of Statistics, Centrelink, the Child Support Agency and Medicare Australia in accordance with the authority contained in the *Auditor-General Act 1997*. Pursuant to Senate Standing Order 166 relating to the presentation of documents when the Senate is not sitting, I present the report of this audit and the accompanying brochure. The report is titled *Forms for the Individual Service Delivery*.

Following its presentation and receipt, the report will be placed on the Australian National Audit Office's Homepage—<http://www.anao.gov.au>.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian McPhee', is positioned above the printed name.

Ian McPhee
Auditor-General

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

AUDITING FOR AUSTRALIA

The Auditor-General is head of the Australian National Audit Office. The ANAO assists the Auditor-General to carry out his duties under the *Auditor-General Act 1997* to undertake performance audits and financial statement audits of Commonwealth public sector bodies and to provide independent reports and advice for the Parliament, the Government and the community. The aim is to improve Commonwealth public sector administration and accountability.

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Abbreviations

ABS	Australian Bureau of Statistics
AGIMO	Australian Government Information Management Office, a Division of the Department of Finance and Administration
ANAO	Australian National Audit Office
CSA	Child Support Agency
HIC	Health Insurance Commission, the predecessor of Medicare Australia
HREOC	Human Rights and Equal Opportunity Commission
HTML	Hyper Text Mark-up Language
ICT	Information and communications technologies
IVR	Interactive Voice Response
PDF	Portable Document Format
TTY	Telephone Type Writer
UK NAO	United Kingdom National Audit Office
W3C	World Wide Web Consortium
XHTML	Extensible Hyper Text Markup Language

Glossary of audited forms

Form number in report	Abbreviated title	Full title of the form
1	<i>Census Household Form 4</i>	<i>Census Household Form 4</i> —a trial version of the 2006 national Census form (comprising possible new questions), Australian Bureau of Statistics
2	<i>Farm Help claim</i>	Claim for AAA—Farm Help—Supporting Families Through Change (Form SU471A.0502), Centrelink
3	<i>Newstart Allowance claim</i>	Claim for Newstart Allowance (Form SU465.0410), Centrelink
4	<i>Youth Allowance claim</i>	Claim for Youth Allowance (Form SY001.0410), Centrelink
5	<i>Interactive Voice Response reporting of income and activity</i>	Interactive Voice Response telephone facility for reporting of income and activity for selected Centrelink programmes
6	<i>Online reporting of income and activity</i>	Online reporting of income and activity for selected Centrelink programmes

Form number in report	Abbreviated title	Full title of the form
7	<i>Child Support assessment application</i>	Application for Child Support Assessment—101 / CSA 1665-12.2004, Child Support Agency (CSA) Application for Child Support Assessment—telephone application to a Customer Service Officer in the CSA
8	<i>Child Support change initiated by CSA</i>	RICA Your response: Child Support Agency (CSA) initiated change to your child support assessment
9	<i>Child Support special circumstances application</i>	Your application: changing your child support assessment in special circumstances (booklet incorporating a form, and online form CSA 1970-6.2004)
10	<i>Child Support special circumstances response</i>	Your response: changing your child support assessment in special circumstances (booklet incorporating a form and online form CSA 1971-6.2004)
11	<i>Medicare enrolment application</i>	<i>Medicare Enrolment Application</i> (Form 3101, design date January 2003), Medicare Australia
12	<i>Medicare Smartcard registration</i>	<i>Medicare Smartcard Registration</i> (Form 1085a.17.12.04), limited rollout, Medicare Australia

Summary and Recommendations

Summary

Background

1. The Australian Government has recently increased its focus on the quality of services delivered by Australian Government agencies to members of the public. A demonstration of this was the October 2004 expansion of the Finance and Administration Portfolio to include a new Human Services Department and the transfer of several agencies, which administer, in total, more than \$80 billion of expenditure for human services each year.
2. The first step in the provision of government services to an individual usually involves the gathering of information necessary to establish the person's identity and their eligibility for the service. Australian Government agencies typically collect this information via forms.¹ Accordingly, effective forms are a crucial element in the efficient and effective delivery of services to customers.
3. Human Services agencies issue and receive back million of forms per year, and the Minister for Human Services has recognised the importance of improving many of these forms. The Minister issued a media release on 5 September 2005² stating: 'the six Human Service agencies are working closely to slash paperwork and produce easier-to-use forms'.
4. Difficult forms are likely to have an immediate, negative impact on people's perception of the quality and accessibility of an agency's services. Conversely, well-designed forms (ones with user-friendly language, are easy to handle, easy to understand and complete, and collect only necessary information) make it easier for members of the public to access government services. Well-designed forms also support administrative efficiency, because they collect comprehensive and accurate information. This reduces costly rework to fix errors caused when incomplete or inaccurate information has been provided, and reduces the likelihood of customer complaints, which can also be costly to address.

¹ A form is a template containing space for the input of variable information.

² Minister for Human Services, *A New Era in Service Delivery*, media release 05/100, 5 September 2005.

5. Historically, paper forms have been the basic means by which agencies have gathered information to implement government policy. However, the reliance on paper forms as the basic administrative tool for these purposes is slowly reducing. Agencies are exploring the potential for efficiencies and improved quality of customer service available from use of the telephone and/or the Internet to transact business.

6. Therefore, as new technologies have emerged, the business-enabling role of forms has evolved to provide more immediate and more effective communication between agencies and their customers.

Audit approach

7. Given the fundamental role forms play in Australian Government service delivery, the ANAO considered that it was timely to undertake an audit that examined how well key Australian Government agencies responsible for delivery of services to individuals manage form design and review. The service delivery agencies selected for audit were the three largest Human Services agencies—Centrelink, the Child Support Agency (CSA) and Medicare Australia.

8. As a benchmark for comparison, the ANAO also looked at the Australian Bureau of Statistics' (ABS') use of forms in the conduct of the Household Census, the keystone of the Census of Population and Housing. The Household Census form is a significant form, which has been subject to continuous improvement over a very long period, offering potential for the identification of sound practices in form design and review.

9. Accordingly, the objectives of the audit were to:

- distil the practices adopted in the selected agencies which contributed to better form design and communication; and
- provide feedback to these agencies about the useability, delivery and receipt of selected forms and the effectiveness of the processes and practices underpinning them.

10. A key element of the audit methodology was the detailed review of the effectiveness of a sample of 11 forms currently in use in Centrelink, the CSA and Medicare Australia, as well as a Census trial form containing new questions to be included in the 2006 Census. The audit tested a range of forms, including those with high volume usage, those used by young people and specialised customer groups, those for online reporting or completed through an interactive voice response telephone facility, and those designed to be completed over the telephone with the assistance of a Customer Service Officer.

11. To examine these forms, the ANAO: arranged for professional facilitators to convene a series of focus group discussions with members of the public on the forms in the ANAO's sample; engaged specialists to review attributes of form design and accessibility; and consulted with a range of stakeholder organisations representing the interests of particular client groups.

12. The ANAO conducted fieldwork in each of the audited agencies to identify the processes they used to design and review forms. The ANAO also identified the extent to which the agencies' forms are available online and their approaches to placing forms online.

Audit conclusion

13. While forms issued by the selected agencies were generally user-friendly and effective in collecting the desired information, the audit identified many opportunities to improve form design, delivery and receipt, and for better processes to deliver such improvements on an ongoing basis.

14. Figure 1 outlines the audit's particular suggestions to improve the useability of the selected forms, particularly those issued by Human Services agencies. These suggestions are also likely to be of benefit to other agencies using forms to collect critical information from customers to enable the delivery of government services.

Figure 1

Suggestions to enhance the useability of forms

<i>Useability of forms will improve if the agency:</i>
<ul style="list-style-type: none">• develops and tests a form logic that is easy for clients to understand and follow;• avoids complex numbering of sections and questions;• pre-populates significant fields, to the extent possible;• uses navigational aids^a to increase readability and to strengthen messages of required documentation;• uses user-friendly design features, such as light coloured paper, black ink for questions, coloured ink (suitable for vision-impaired readers) and font sizes appropriate to the client groups; and• tests the useability of its forms from the perspectives of client groups who have special needs.

Note: (a) Examples include: coloured type directions to guide 'skip' instructions; questions within columns separate from instructions/other information; icons such as paperclips; and a facility for respondents to provide additional comments when completing forms.

Source: ANAO conclusion from assessing audit evidence.

15. There was a strong commonality between the suggestions made by the community groups to whom the ANAO spoke during this audit, the suggestions of the focus groups convened by the ANAO, and the indicators of effective form design developed by expert forms practitioners for this audit.

16. Figure 2 outlines the audit’s particular suggestions to strengthen processes and practices for form design, issue and review.

Figure 2**Suggestions to strengthen processes and practices for form design, issue and review*****Processes for form design, issue and review will improve if the agency:***

- consults with relevant community organisations about the communications needs and preferences of the client groups each represents and take account of this information in form design and review activities;
- strengthens understanding of client preferences and constraints influencing communication channel use (mode of communication), and facilitates clients' connection to the mode of delivery most appropriate to their circumstances;
- involves design experts with content owners of forms early in the design process to enable more effective and efficient form design approaches;
- tests how easily forms placed on its website may be found, including by users with special print handicap, literacy, language and dexterity needs;
- undertakes independent market research on customer satisfaction with its major forms and associated information products; and
- undertakes systematic and regular analysis of customers' completion patterns for the main forms used for delivering major programmes.

Source: ANAO conclusion from assessing audit evidence.

17. Key observations about form design for the selected agencies were that:

- similar to the ABS, Centrelink's selected forms were generally well-designed, with clear purpose, effective layout and logical sequencing. This enabled useability despite the forms often necessarily being long and complex;
- while the CSA concentrated on telephone-based applications, its paper forms had some design strengths but were generally less user-friendly than those of the ABS and Centrelink; and
- Medicare Australia's *Medicare enrolment application* form was brief and logically structured. However, the *Medicare Smartcard registration* form could be better designed to improve clarity, comprehension, and navigational flow.

18. Agencies that had sound form design processes generally produced useable forms. This enabled effective communication with their customers, and increased efficiency through reduced rework. Key observations about the form design, issue and review processes of the selected agencies were:

- similar to the ABS, Centrelink managed robust processes to understand and respond to clients' communications needs and preferences; provided appropriate channels (such as in person, by telephone, online and by post) for the delivery and receipt of forms, and made good progress towards the delivery of services online; actively managed its budgets for form design and review; had a designated Forms Officer who was responsible for coordinating and managing all aspects of forms development and production; and had detailed protocols/guidelines for form development. However, Centrelink could improve the ease by which users could find its online forms;
- the CSA also provided broadly appropriate channels for the delivery and receipt of forms; had a designated Forms Officer and appropriate protocols for forms development; but there was scope to improve research into clients' communications needs and preferences, and strengthen analysis of customers' form completion patterns to identify common areas of difficulty;
- Medicare Australia provided broadly appropriate channels for the delivery and receipt of forms but there was scope to improve research into clients' communications needs and preferences, introduce protocols for forms development, consider designating a Forms Officer, and strengthen analysis of customers' form completion patterns to identify common areas of difficulty; and
- each of the audited agencies could improve aspects of their form design and accessibility, so that clients with vision or other impairment affecting literacy can access their forms.

Recommendation

19. The ANAO made one recommendation for improvement in the useability of forms, particularly those issued by Human Services agencies. However, the audit recommendation and suggested approaches to form characteristics, design and review presented in the report are commended to all agencies which use forms for service delivery to individuals.

Agencies' responses

20. Each agency's response to the audit findings is presented below.

21. ABS response:

The ABS supports Recommendation No 1 of the report. The ABS is happy with the general findings of the report. In particular, we are pleased that the report acknowledges, in paragraph 1.14, that consideration needs to be given to the objectives of the forms being reviewed and their 'fitness for purpose', for example whether the forms are being produced for administrative purposes or for statistical purposes. The ABS is also pleased that the report has clearly indicated, in paragraph 3.52, the development and testing work that has been undertaken in developing an electronic Census form which meets the World Wide Web Consortium (W3C) Guidelines for Accessibility Compliance Level AA and that this electronic form will increase the accessibility of the Census form for people with disabilities.

22. Centrelink response:

Centrelink welcomes the ANAO's acknowledgement of the complexities involved in effecting timely, cost-effective and efficient interactions between government agencies and individuals in the context of a rapidly changing technological environment. Centrelink agrees with the one recommendation arising from the report. Centrelink will discuss this report and its recommendation with purchasing departments in the context of Centrelink's already well established processes for on-going improvement to forms design, delivery, receipt and review.

23. The CSA response:

The CSA agrees with the ANAO's main recommendation and many of the further suggestions outlined in the report. Please note that the Parkinson report may be considered and acted on by Government over the coming months. The CSA will use every opportunity to implement these recommendations when redeveloping material to accommodate new Government policy. Thank you for the opportunity to comment on your review and for helping CSA continuously improve our service delivery to our customers.

24. Medicare Australia response:

Medicare Australia welcomes the assurance provided by the ANAO that the forms issued were generally user-friendly and effective in collecting the desired information and that Medicare Australia provided broadly appropriate channels for the delivery and receipt of forms. Medicare Australia is reviewing letters and forms to make them easier for our customers to use and understand. The ANAO recommendation will be addressed during this process. Medicare Australia agrees with the ANAO recommendation.

Recommendation

Recommendation No.1

Para 3.119

The ANAO recommends that agencies test the useability of their forms prior to their release, taking account of the literacy skills and accessibility needs of their client groups.

Centrelink response: Agreed.

Child Support Agency response: Agreed.

Medicare Australia response: Agreed.

Australian Bureau of Statistics response: Supported the recommendation.

Audit Findings and Conclusions

1. Introduction

This chapter provides the background to the audit, explains the audit approach and describes the structure of the report.

Background

1.1 The Australian Government has increasingly focused on the quality of services delivered by Australian Government agencies to members of the public. A demonstration of this was the October 2004 expansion of the Finance and Administration Portfolio to include a new Human Services Department and the transfer of several agencies, which administer, in total, more than \$80 billion of expenditure on human services each year. In announcing this decision, the Prime Minister stated: ‘the new department reflects the strong commitment of the Government to reinvigorate public administration and improve the delivery of services to the many Australians who have contact with these agencies’.³

1.2 The first step in the provision of government services to an individual usually involves the gathering of information necessary to establish the person’s identity and their eligibility for the service. Historically, paper forms⁴ have been the basic means by which agencies have gathered such information to implement government policy. Human Services agencies issue and receive back million of forms per year, and the Minister for Human Services has recognised the importance of improving many of these forms. Accordingly, effective forms are a crucial element in the efficient and effective delivery of services to customers.

1.3 The Minister for Human Services has recognised the importance of improving forms in the portfolio. The Minister issued a media release on 5 September 2005⁵ stating: ‘the six Human Service agencies are working closely to slash paperwork and produce easier-to-use forms’.⁶

³ Prime Minister, *Fourth Howard Ministry*, media release, 22 October 2004.

⁴ A form is a template containing space for the input of variable information.

⁵ Minister for Human Services, *A New Era in Service Delivery*, media release 05/100, 5 September 2005.

⁶ Centrelink has been rationalising its range of forms over recent years. It has amalgamated forms, where possible, and identified obsolete forms. For example, there were many separate forms enabling previous recipients of Centrelink income support payments to re-apply for the same type of benefit within a defined period of time. Now there is two forms covering re-applications for all benefit types.

1.4 The reliance on paper forms as the basic administrative tool for these purposes is slowly reducing. This is occurring as agencies explore the potential for efficiencies and improved quality of customer service available from use of the telephone and/or the Internet to transact business. As new technologies have emerged, the business-enabling role of forms has evolved to provide more immediate and more effective communication between agencies and their customers. For example, Centrelink and Medicare Australia⁷ are working together to improve the claim and enrolment processes and related forms for families after the birth of a child.

1.5 Whether paper or electronic, forms continue to play a fundamental role in the delivery of Australian Government services to individuals, with forms often constituting the most basic and significant communication between the relevant agency and the individuals to whom it is providing services. Therefore, user-friendliness and accessibility of both paper and electronic forms affect public opinion of government services.

1.6 There are differences in the ways users view and respond to electronic forms. Unless carefully managed, these differences can affect customer access to services and data quality. Nonetheless, common principles of useability and accessibility apply to all forms regardless of the channels (such as in person, by telephone, online and by post) through which they are received and lodged.

1.7 Difficult forms (ones that are badly designed, hard to understand and/or difficult or onerous to complete) are likely to have an immediate, negative impact on people's perception of the quality and accessibility of an agency's services. Conversely, well-designed forms (ones that are written in user-friendly language, are easy to handle, easy to understand and complete, and collect only necessary information) make it easier for members of the public to access government services.

1.8 Similarly, well-designed forms support administrative efficiency, because as complete and accurate information as possible is obtained on the first attempt. This reduces costly rework to fix errors caused when incomplete or inaccurate information has been provided. Often, customers provide inadequate information, either because the relevant form did not ask the customer for all necessary information or it was poorly designed, such that the customer did not clearly understand what was required.

⁷ The predecessor to Medicare Australia was the Health Insurance Commission. On 1 October 2005, with the commencement of the *Human Services Legislation Amendment Act 2005*, the organisation's name became Medicare Australia.

1.9 Efficient and easy access to government services also reduces the likelihood of customer complaints, which can be time consuming and expensive to address.

1.10 While serving as basic communication tools, forms are also corporate icons that carry messages to the community about the way the agency regards its clients and about the professionalism, progressiveness and client-focus of the agency that produces them. Investment in effective forms will not only improve the quality of data received by the agency, it will also improve the corporate image of the agency that owns the form.

Audit approach

1.11 Given the fundamental role forms play in Australian Government service delivery, the ANAO considered that it was timely to undertake an audit that looked at how well key Australian Government agencies, responsible for delivery of services to individuals, manage form design and review.

1.12 The objectives of the audit were to:

- distil the practices adopted in the selected agencies which contributed to better form design and communication; and
- provide feedback to these agencies about the useability, delivery and receipt of selected forms and the effectiveness of the processes and practices underpinning them.

1.13 The ANAO looked at form design in the selected agencies because:

- the Human Services agencies use hundreds of types of paper and electronic forms for their communication with individual applicants for, and recipients of, Australian Government services while studying, seeking employment or experiencing life crises. As mentioned earlier, these agencies administer, in total, more than \$80 billion of expenditure for human services each year. In many cases, the initial communication between people in the community and Government agencies is form-based; and

- the Australian Bureau of Statistics' (ABS') Household Census is the keystone of the Census of Population and Housing.⁸ The Household Census form is a significant form designed to collect a great deal of important information from individuals and households. In addition, the Household Census form has been subject to continuous improvement over a very long period, offering potential for the identification of sound practices in form design and review.

1.14 The ANAO recognises that form objectives differ depending on the programme objective. In contrast to forms supporting individual financial disbursement, Census forms are designed to collect information, using self-completion, for statistical rather than administrative purposes. The ABS advised the ANAO in October 2005 that, while the highest possible level of accuracy is sought, a small amount of reporting error does not impair the overall fitness for purpose for which the Census data are collected. This purpose determines both the nature of the questions included in the Census form (as some questions are not suitable to be asked on a self-completed form) and the nature and extent of the testing programme.

Audit methodology

1.15 The ANAO conducted fieldwork in each of the audited agencies to identify the processes they used to design and review forms. The ANAO also conducted a search of the websites of the agencies, to identify the extent to which the agencies' forms are available online, and their approaches to placing forms online.

1.16 To inform the ANAO's assessment of the overall effectiveness of the agencies' form design and review processes, another key element of the audit methodology was the detailed review of the effectiveness of a sample of forms currently in use in the three Human Services agencies covered in this audit, as well as a well-developed draft of a form which contained new questions to be included in the 2006 Census.

⁸ The Census collects data on a range of socio-economic and labour market topics. The primary vehicle for the Census of Population and Housing is the Household Census form, delivered to and completed by householders. Householders record all people actually staying in that dwelling on Census night.

1.17 This review included:

- the conduct of a series of focus group discussions with members of the public on the forms in the ANAO's sample (at least one focus group for each form or related suite of forms under review). Professional focus group facilitators, engaged by the ANAO, conducted these focus group discussions. Areas explored with these focus groups included: the clarity of the particular form; its comprehensibility; how accessible participants found the form; and whether participants found the information provided and the questions asked by the form to be relevant;
- review, by a survey specialist engaged by the ANAO, of the form logic⁹ of the forms in the sample;
- review of the forms' accessibility¹⁰ by another consultant engaged by the ANAO; and
- consultation with a range of stakeholder organisations representing the interests of particular client groups (such as aged people, single parents and people experiencing life crises) for which the forms in the sample were relevant.

1.18 Agencies' form design and review processes, and the selected forms in the ANAO's sample, were analysed against audit criteria developed drawing on good practice principles of form design identified for the ANAO by consultant experts in survey design (see Appendix 1), and the development of accessible formats for users with a print disability (see Appendix 2), relevant industry and government guidelines related to forms and surveys, and good practice principles published by the United Kingdom National Audit Office (UK NAO) in conjunction with its 2003 audit, *Difficult Forms: How government agencies interact with citizens*.¹¹

⁹ Questions should be grouped logically, retaining the attention of the person completing the form. In addition to question content and order, the internal coherence of a form is also influenced by the physical layout.

¹⁰ Forms need to be accessible. That is, an agency's customers, including people with special print or dexterity needs, should be able to open and complete forms.

¹¹ UK NAO, *Improving and reviewing government forms: A practical guide* [Internet]. The Stationery Office, London, 2003, available from <http://www.nao.org.uk/publications/nao_reports/02-03/02031145_good_practice_guide.pdf> [accessed 21 September 2005]. The associated publication, UK NAO, *Difficult forms: How government agencies interact with citizens* [Internet]. The Stationery Office, London, 2003, available from <http://www.nao.org.uk/publications/nao_reports/02-03/02031145.pdf> [accessed 21 September 2005].

1.19 In particular, the UK NAO audit identified ‘difficulty criteria’ which address the physical characteristics of forms (such as size, format, layout and use of checklists) and content such as threats of legal coercion, expectations of applicants in terms of performing mathematical calculations, and provision of copies of documentation.

1.20 To illustrate the comparative performance of the audited agencies, the audit criteria, along with a summary of the ANAO’s assessment of the degree to which agencies met them, are listed in tables in the relevant sections of Chapters 2 and 3.

Audit sample

1.21 As mentioned above, a key element of the audit methodology was the detailed review of the effectiveness of a sample of forms currently in use in Centrelink, the CSA and Medicare Australia, as well as a Census test form containing new questions to be included in the 2006 Census.

1.22 The ANAO consulted with the agencies in selecting the sample, to maximise the usefulness of the review. The resulting sample includes forms:

- **with high volume usage**—for example, it is expected that an estimated eight million households will complete the 2006 Census Household form.¹² Centrelink prints annually around 30 000 paper Newstart claim forms and around 400 000 paper claims for Youth Allowance, as well as forms published electronically via the Internet and forms downloaded and lodged through Centrelink’s regional network. Medicare Australia processes around 6.6 million enrolment-associated transactions annually, including processing approximately 450 000 paper Medicare enrolment forms annually;
- **used by young people**—specifically the Centrelink form for young job seekers and students to apply for Youth Allowance;
- **for specialised customer groups**—in this case, the Centrelink Farm Help¹³ claim for farmers’ income support, advice, training and re-establishment;

¹² Some 11 million Household Census forms will be printed.

¹³ Under the AAA—*Farm Help—Supporting Families Through Change*, fortnightly income support, at the same rate as Newstart Allowance, may be payable to eligible applicants for up to 12 months. Applicants complete a Farm Help application form, available from local Centrelink Customer Service Centres. Since mid-2005, the form has also been available through Centrelink’s website.

- **for online reporting**—the online form Centrelink provides for online reporting of income and job seeking activity for selected programmes using the form SU019;¹⁴
- **completed through an interactive voice response telephone facility**—provided by Centrelink for telephone reporting of income and job seeking activity for selected programmes using the form SU019, and involving around 138 000 fortnightly reports of clients' income and activity using its speech recognition service; and
- **designed to be completed over the telephone with the assistance of a Customer Service Officer**—a major thrust of CSA's service delivery over the past seven years has been to encourage customers to contact the agency by telephone, both to complete forms, such as the *Child Support Assessment application*, and to provide updated information. Data provided by the CSA indicate that, for each 1 000 transactions processed, paper forms are used by only around six applicants for child support assessment and one child support payer whose assessment is reviewed at the initiative of the CSA.

1.23 The audit also considered the useability of the information booklets on the Household Census and booklets associated with application forms under the Newstart Allowance, Youth Allowance and Child Support programmes.

¹⁴ Centrelink has introduced online and telephone reporting options for activity-tested customers, allowing the option of reporting online via a website, or by calling a '13' phone number. The purpose of the online/phone report is to provide an electronic means by which customers can report their earnings and activity details to Centrelink, in place of a hard copy form SU019.

1.24 Figure 1.1 identifies the particular forms reviewed by the ANAO.

Figure 1.1

Forms included in ANAO's audit sample

Agency	Form number in this report	Abbreviated form title used in this report ^(a)
Australian Bureau of Statistics	Form 1	<i>Census Household Form 4^(b)</i>
Centrelink	Form 2	<i>Farm Help claim</i>
	Form 3	<i>Newstart Allowance claim</i>
	Form 4	<i>Youth Allowance claim</i>
	Form 5	<i>Interactive Voice Response reporting of income and activity</i>
	Form 6	<i>Online reporting of income and activity</i>
Child Support Agency	Form 7	<i>Child Support assessment application</i>
	Form 8	<i>Child Support change initiated by CSA</i>
	Form 9	<i>Child Support special circumstances application</i>
	Form 10	<i>Child Support special circumstances response</i>
Medicare Australia	Form 11	<i>Medicare enrolment application</i>
	Form 12	<i>Medicare Smartcard registration</i>

Notes: (a) See full titles of the audited forms in the Glossary.

(b) This form was used for the Census trial of 10 August 2004.

Source: ANAO selection of forms.

Assistance to the audit

1.25 The ANAO engaged Professor Ian McAllister from the Australian National University's Research School of Social Sciences to assist with the development of criteria for form design, and the detailed testing of the selected forms in the ANAO's sample against the resultant criteria.

1.26 Two consultant firms, Market Attitude Research Services and Perform, were engaged to conduct focus group testing of the forms in the ANAO's sample.

1.27 Accessible Information Solutions, a business unit of Vision Australia, assisted in the development of criteria covering accessibility of government forms and conducted detailed accessibility testing of selected forms.

1.28 The ANAO also approached a range of relevant stakeholder groups in the community to provide information to the audit about their perspectives on good form design; and several did so. Their views are summarised in the report (see paragraphs 2.15 and Figures 2.12 and 2.19).

1.29 Feedback from the ANAO's focus groups was provided to agencies progressively throughout the audit. At the request of the CSA, the preliminary audit findings related to its forms, including the outcomes of the focus groups commissioned by the ANAO, were provided to the agency as early as possible, in March 2005. This approach was intended to support a review of operational processes by the CSA underway during the course of the audit. Results of focus groups' consideration of forms were provided to the other audited agencies in July 2005.

1.30 The ANAO provided detailed results of accessibility testing of the audited forms to the agencies in September 2005, to enable the agencies to address the issues identified through this testing.

1.31 The audit was conducted in accordance with ANAO auditing standards at a cost to the ANAO of \$421 000.

Structure of the report

1.32 The following two chapters address:

- the useability of forms; and
- practices that support effective form design.

2. Useability of Forms

This chapter discusses some of the characteristics of successful forms from a user's perspective and presents the ANAO's findings and observations on the four agencies' forms selected for review during the audit.

Introduction

2.1 Successful forms do not happen by accident. They are based on careful customer research; are well designed; have thoughtfully devised and clearly expressed questions; and have been thoroughly tested before release. Effective design uses text, typography, colour and layout to make a form easy to fill in, return and process.¹⁵

2.2 This chapter focuses on the end results of agencies' efforts to produce effective forms and, in particular, on the useability, or user-friendliness, of selected forms for members of the public.

2.3 Research by the UK NAO (see footnote 11) and academics suggests that unfavourable public opinion of agencies can arise where people experience difficulties in:

- readily identifying the particular form they need;
- obtaining the correct form in a timely and convenient manner;
- understanding the form and related guidance material;
- completing the form and assembling any attachments required; and
- returning the form to the agency.

2.4 Of course, any unfavourable views about the agency are likely to be reinforced where further contact with the agency is required to correct any errors found in the form or to provide essential information that has been inadvertently omitted.

2.5 The findings in this chapter are based on an assessment of 12 forms by the ANAO. The criteria, against which the ANAO tested these forms, were distilled from the criteria developed by ANAO's consultants (with expertise in survey design and accessible design of printed and electronic material) and

¹⁵ Snooks and Co, *Style manual: for authors, editors and printers*, 6th edn, John Wiley and Sons Australia Ltd, Milton, 2002, p. 360.

those identified by the UK NAO in its 2002-03 review of form design (see paragraph 1.18).

2.6 Figure 2.1 presents the ANAO's assessment of these forms against the criteria, defined in Appendix 1, and summarised as follows:

- purpose: the use of the form from the perspective of the form users;
- quick start: question order and format and content of supporting guidance, enable the form user to gain a sense of progress, particularly if the form is long. Using icons and diagrams enable the applicant to quickly acquire the minimal information that is needed to begin filling out the form;
- short and concise: forms should be as short as possible, to direct and focus attention;
- readability: clarity, reading ease of sentence construction and vocabulary, use of icons, and minimal use of acronyms and technical terms;
- minimum complexity: instructions and questions should not assume that persons possess complex or technical information;
- effective layout: elements include easy-to-read fonts, colours and icons to guide people to specific sections (navigate the form);
- logical sequencing: logical sequence of questions which the form user will find obvious; and minimal use of skips, so people do not have to navigate between questions and sections not relevant to them;
- legibility: use of colours visible to those with vision impairment, minimal use of italics, and effective use of borders and shading, font size and spaces; and
- accessibility: an agency's customers, including people with special print or dexterity needs, should be able to open and complete forms.

Figure 2.1**Useability of selected forms^a**

Criteria	ABS	Centrelink					CSA				Medicare Australia	
Form number	1	2	3	4	5	6	7	8	9	10	11	12
Purpose stated at the outset	■	□	■	□	na	■	□	□	□	□	■	□
Quick start on form possible	■	□	□	□	■	■	□	□	□	□	□	□
Short and concise	□	□	□	□	■	■	□	■	□	□	■	□
Readability	□	□	□	□	na	■	□	□	□	□	□	□
Minimum complexity	□	□	□	□	■	□	□	□	□	□	■	■
Effective layout	■	□	■	□	■	■	□	■	□	□	■	□
Logical sequencing	■	■	■	□	■	■	□	□	□	■	■	□
Adequate legibility	□	□	□	□	na	■	□	□	□	□	□	□
Readily accessible	*	□	□	□	na	□	□	□	□	□	□	□

Legend: ■ Substantially met □ Partially met □ Largely not met * not tested na not applicable

Note: (a) Form useability does not depend on all criteria being met. For example, complexity may be difficult to avoid in some legislative contexts. Complexity could be offset by other design features, such as layout, readability and logical sequence.

Source: ANAO assessment of forms, taking account of: expert opinion on survey design criteria and accessibility; focus group feedback on useability; and the difficulty criteria developed by the UK NAO.

Clear purpose of the form

2.7 As discussed in Chapter 1, forms play a fundamental role in the delivery of agencies' services to individuals. Almost all services provided to the public by Australian Government agencies require that one or more forms be completed before initial access is granted. Often a number of additional forms also need to be completed at various times over the period that the services are received. Accordingly, some agencies have hundreds of different types of forms to cover a range of services in various circumstances.

2.8 Across all Australian Government agencies, the range of different forms used by individuals number in the thousands. The agencies involved in

this audit advised the ANAO that the number of forms available for completion by individuals, in October 2005, were:

- ABS: six paper forms and an electronic form for the 2006 Census, as well as forms used in its other surveys;
- Centrelink: over 500 different types of customer contact forms (and associated forms for completion by professionals) including 48 Newstart, 23 Newstart/Youth Allowance and 33 Youth Allowance products;
- CSA: 28 forms; and
- Medicare Australia: six forms associated with Medicare enrolment, as well as customer forms for its other programmes such as Australian Organ Donor.

2.9 Ideally, a person should be able to understand the purpose of a form from its title. By convention, forms should also display a unique number¹⁶ to assist in identification of the correct form and for version control, stock control, and ordering purposes.

2.10 Generally, the purpose of the forms the ANAO reviewed was clear from the title; and the forms were uniquely numbered. However, the ANAO noted some exceptions. These are summarised in Figure 2.2, along with suggested improvements agencies could make to address the identified issues. Illustrative extracts from most of the forms are reproduced at Appendix 3, while Form 7, *Child Support application* is shown in Figure 2.6.

Figure 2.2
Selected forms where the purpose was not clear

Form	Issue	ANAO suggestion
Form 2, <i>Farm Help claim</i>	<p>The title of Form 2 contains an unfamiliar abbreviation ('AAA', but this is explained in the preamble below the title).</p> <p>The words 'Claim for' are smaller font than the remainder of the title and they are placed in a position where they are likely to be missed.</p> <p>The words 'Supporting families through change' unnecessarily complicate the title. With the exception of 'Claim for', all of the words in the form title are repeated in the first line immediately below the title bar.</p>	Simplify the title by removing abbreviations, clarify the purpose of the form and remove duplication.

¹⁶ Often a combination of alpha and numeric characters which include the version release date.

Form	Issue	ANAO suggestion
Form 4, <i>Youth Allowance claim</i>	The first line of text under the title states that: 'This claim is to be completed by or on behalf of the person claiming Youth Allowance.'	A statement of purpose be placed at the top of the form, along the lines of Form 3, the <i>Newstart Allowance claim</i> form, which states its purpose clearly as: 'Claim for income support while looking for work'.
Forms 7, 8, 9 and 10, <i>Child Support assessment application, Child Support change initiated by CSA, Child Support special circumstances application and Child Support special circumstances response</i>	<p>The titles on the electronic versions of the CSA forms are lengthy, clumsy and do not stand out on the forms.^a</p> <p>It is likely that many CSA clients would not be familiar with the acronym RICA in the title of Form 8. The purpose of the form is not immediately stated, but appears in the fifth line of text after the title.</p> <p>The titles and appearance of the forms are similar to each other.</p> <p>The rationale for including numerals in the title of Form 7 (<i>101 Application for child support assessment</i>) would not be evident to many users. This numbering practice is inconsistent with the titles in the other three CSA forms examined in this audit.</p> <p>Form 7 has two identities—as Form 101 and as CSA 1665-12.2004.</p>	<p>Font size could be enlarged and better visual delineation provided between the form title and the text that follows.</p> <p>The titles could be simplified and better distinguished from other similar child support forms. For example:</p> <ul style="list-style-type: none"> - Form 8 <i>RICA Your response: CSA initiated change to your child support assessment</i> could be retitled <i>Response to Proposed Change of Assessment</i>; - Form 9 <i>Your application: changing your child support assessment in special circumstances</i> could be retitled <i>Application for Change of Assessment</i>; and - Form 10 <i>Your response: changing your child support assessment in special circumstances</i> could be retitled <i>Response to Claims by Other Parent</i>.
Form 12, <i>Medicare Smartcard registration</i>	Neither the form nor the guidance accompanying it explains what the form is intended to do or what the Medicare Smartcard is.	The <i>Medicare Smartcard registration</i> form needs a statement of purpose, along with some explanatory information about the Medicare Smartcard (compare with Form 11 which states in the first line below the title that 'This form should be used to enrol for Medicare and to obtain a Medicare card').

Note: (a) CSA online forms differ in format and content from the printed versions of the forms.

Source: ANAO, based on analysis by survey design expert, and focus group feedback.

2.11 The CSA advised the ANAO in October 2005 that it was investigating an alternative solution to distributing its forms, so that staff would not need to refer to the internal references at the top of the forms (For example, '101' in Form 7, *Child Support assessment application* and 'RICA' in Form 8, *Child Support change initiated by CSA*).

2.12 Form 3, Centrelink's *Newstart Allowance claim* form exemplifies a clear form title and purpose. It is depicted in Figure 2.3.

Figure 2.3

Clear form title and purpose: *Newstart Allowance claim*

SU465

Australian Government

Centrelink

Claim for Newstart Allowance

Newstart Allowance
Claim for income support while looking for work.

Important: It is now possible to claim Newstart Allowance without filling in this form. If you wish to do this, phone Centrelink on **13 2850** or ask your local Centrelink office.

Source: Centrelink, *Newstart Allowance claim*.

2.13 It is useful for forms to explain briefly the rationale for questions.¹⁷ The guidance for Form 1, *Census Household Form 4*, and Form 10, *Child Support special circumstances response*, explain why questions are asked and provide examples of how to respond. In contrast, the second section of Form 12, *Medicare Smartcard registration* form ('Cardholder's details'), asks the person completing the form to acknowledge by ticking a box that they have understood who is eligible for the Medicare Smartcard. It is not clear what purpose this acknowledgement has, or whether or not it has some legal status. This needs to be explained.

¹⁷ To address the risk that people may perceive sections of a form as pointless or irrelevant to them.

2.14 The ANAO considers that addressing the above issues would not be costly for agencies. Furthermore, such changes could clarify matters for the form user and, therefore, reduce the potential for misunderstanding and error. Such errors cause rework and cost money. Online forms could be quickly and easily amended. Changes to hardcopy forms could be taken up at the next reprint.

2.15 The ANAO held discussions with a number of relevant stakeholder groups, who emphasised that it is crucial for forms to clearly explain their purpose. Similar to the focus group discussions of the forms examined in the audit, these stakeholder groups indicated that user-friendly forms:

- have a succinct title that clearly reveals its purpose;
- immediately explain the purpose of the form, using clear, concise language;
- display a unique identifier;
- explain why intrusive personal information is requested;
- avoid asking for information that is not directly used for the stated purpose of the form; and
- make it clear that agencies will not pass information to unrelated organisations.

Quick start

2.16 Forms with long preambles, or questions that can only be understood after referring to detailed guidance notes, are likely to cause frustration for many users. The UK NAO reported that its focus groups identified that people wanted a quick start to a form, with simple items first.¹⁸

2.17 Accordingly, it is a good idea to keep introductory material to a minimum and, if possible, integrate contextual information with the questions to which it relates in the form. This makes it easier for the person completing the form to identify guidance relevant to the question being asked, obviates the possibility of the guidance booklet being lost, and reduces duplication between the two booklets.

2.18 An objective of good form design is to make the form as self-instructing as possible. This can be achieved by signposting essential messages at the front of the form, such as where eligibility criteria and customers' rights and obligations are outlined. Users are likely to be unimpressed if they only find out they are ineligible after filling out a long form.



2.19 The forms examined in the audit varied considerably in the amount of introductory material they included. Around one-third of the forms enabled users to make a quick start. Form 1, *Census Household Form 4*, integrates contextual material with the form particularly well. Its introductory material is well laid-out and clear. The user can start completing the form with minimal assistance. This is illustrated in Figure 2.4.

¹⁸ In evidence before the UK Committee of Public Accounts on 19 January 2004, the Chief Executive of the United Kingdom Passport Service, stated: 'We know that a fraction of the people who fill (forms) in never read the guidance notes'. House of Commons Committee of Public Accounts, *Difficult forms: how government departments interact with citizens*, Twenty-sixth report of Session 2003–04 [Internet]. The Stationery Office, London, 2004, available from

<<http://www.publications.parliament.uk/pa/cm200304/cmselect/cmpubacc/255/255.pdf>> [accessed 21 September 2005].

Figure 2.4

Quick Start: Census Household Form 4

Why a census test?
The census is the only practical way to get information on how many people there are in each part of Australia, what they do and how they live. Your answers in this test will help us to design the forms and the procedures for the next census.

Collection authority
The information asked for is collected under the authority of the *Census and Statistics Act 1905*. Your co-operation is sought in completing this form.

Confidentiality
Under the *Census and Statistics Act*, the ABS must not release any information you provide in a way which would enable an individual's or household's data to be identified.

Help available
Phone the Census Inquiry Service on 1800 090 353 (8:30am - 6:00pm Mon-Fri / After hours to 9:00pm on Census Test Night only). For the visually impaired, phone, 1800 059 480. Please quote your Census Form Number shown at top right of this page.

Household Form 4

Census Form Number

WHAT YOU NEED TO DO

- Use this form to record the details of **all people** (including visitors) who spend the night in your dwelling on Census Test Night, **Tuesday, 10 August 2004**.
- Your Collector will return between **11 August and 22 August** to collect your form.
- Please answer **all** the questions for **every** person, unless the form asks you not to.
- If you do not know an answer, give the best answer you can.
- On one form you can record details of **six people**. If you need more forms, or there is more than one household, phone the Census Inquiry Service on **1800 090 353** (8:30am - 6:00pm Mon-Fri / After hours to 9:00pm on Census Test Night only). For the visually impaired, refer to the 'Help available' section below.
- Please refer to the Census Guide if needed.
- Please note the time you take to complete the form.

TO COMPLETE YOUR FORM ON THE INTERNET, VISIT:
www.abs.gov.au/testcensus

HOW TO WRITE YOUR ANSWERS

- Use a **black or blue pen**.
- Mark boxes like this: —
- Start numbers in the first box. 3 2 1
- Write in **CAPITAL** letters and keep each letter within one box. M E L B O U R N E
- Use every box in turn and only miss a box to leave a space between words. P R I M A R Y S
C H O O L T E A
C H E R
- If you make a mistake in a mark box, draw a line through the box like this, or /
- draw a line through the box and re-write the letters like this: T E A C H I N G

1 What is the address of this dwelling?
Please use **CAPITAL** letters only

Apartment/Flat/Unit number
 (if any)

Street number

Street name (Examples: GRAHAM AVENUE, GEORGE STREET)

Suburb/Locality

State/Territory

Postcode

Property/Building name (if any)

Source: ABS, *Census Household Form 4*.

2.20 Form 4, *Youth Allowance claim*, guides users to supporting material and streams ineligible clients (in this example, those with a long-term physical disability affecting work fitness) towards a programme relevant to them. This is illustrated in Figure 2.5.

Figure 2.5
Signposting and streaming at start of form: *Youth Allowance claim*

PART A

Personal details

SY001.0505 (Page 3 of 36)

Have you read the 3 easy steps on page 2? These steps will help you claim Youth Allowance.

1 Are you:
Please refer to the **Information booklet**.
IF you want help looking for work, you can use the Job Network Access facilities available at Centrelink offices. You may also like to ask for a list of the local Job Network members in your area.
IF you are claiming Youth Allowance, but not studying full-time, you will need to contact Centrelink for an interview.

Tick the box below that best describes your current situation.

A full-time student☐ Go to Question 2

Looking for full-time work☐ Go to Question 2

Doing a combination of looking for work and study activities☐ Go to Question 2

Doing a full-time New Apprenticeship (apprenticeship or traineeship)☐ NOTE: please tick one of these options. Apprentice☐ Go to Question 2 OR Trainee☐ Go to Question 2

Temporarily unfit for full-time work or study, but intend to go back☐ Go to Question 2

Unfit for full-time work or study for more than 2 years☐

STOP

You will need to complete a claim for Disability Support Pension. If you do not have this form, call Centrelink on 13 2490.

Source: Centrelink, *Youth Allowance claim*.

2.21 Form 7, *Child Support assessment application*, offers a simple and quick start to form completion on page 2; however, the cover page’s lists of ‘do’ and ‘do not’ instructions do not convey a tone of equality between the applicant and the agency.¹⁹ The CSA advised the ANAO in October 2005 that the lists are intended to minimise errors and unnecessary paperwork that might irritate customers.


2.22 The positive and negative features of the ‘do and do not’ approach are illustrated in Figure 2.6.

¹⁹ To engender cooperation, language should avoid subordination—that is, language which assumes that the person is dependent on the agency (see DA Dillman, *Mail out and Internet surveys: The tailored design method*, 2nd edn, John Wiley and Sons, New York, 1999). At the very least, the language should imply that the relationship is an equal one, but preferably it should convey the underlying belief that the person will be assisting the agency by completing the form.

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Figure 2.6

Introductory page: *Child Support assessment application*


Australian Government
Child Support Agency

101

Application for Child Support Assessment

IMPORTANT Did you know that you can collect child support payments yourself? You can make your own private arrangements to collect the payments from the paying parent, or you can ask the Child Support Agency (CSA) to collect the payments for you. Phone **131 272** to discuss your options.

Note: this form can be completed over the phone by calling CSA on 131 272.

When to use this form
Use this form to apply for an assessment of how much child support you should be paid.
To ensure you are eligible to apply for a child support assessment, see 'Who is eligible to apply?' on the back page of this form.
You can also use this form if you want to add another child to your child support assessment, or if your previous assessment has ended and you want to reapply.

When not to use this form
Do not use this form if:

- you already have a child support assessment and want CSA to collect payments (use AFC Form);
- you already have a child support assessment and your personal details have changed (use CMD Form);
- there have been changes which affect the amount of child support payable (use CMD Form); or
- you want to register a child support agreement (use Form 102).

* For a more timely response, AFC and CMD Forms can be processed over the phone.

Need help to complete this form?

- Telephone CSA on 131 272 (local call charge excluding mobile and public phones).
- visit your nearest Centrelink office.

Your privacy
The information requested by CSA is needed for child support purposes and is required by child support law. We do not pass your personal information on to the other parent, except where this is required by law or necessary to make a decision that would affect the other parent.
Some information may be passed to Centrelink, the Australian Taxation Office or to a law enforcement agency. We do not collect information for commercial marketing. We will not pass on your information to any private organisation, except we may provide your contact details to organisations contracted by CSA to carry out research to help CSA improve its services. You are not obliged to participate in this research.
CSA's guidelines on privacy are in accordance with the Information Privacy Principles of the Privacy Act 1988. For more information about the Privacy Act and privacy generally, see the Privacy Commissioner's Web site at www.privacy.gov.au.
For more information about CSA's collection, use and disclosure of information, see The Guide in the legal section of the CSA Web site at www.csa.gov.au

We will not let the paying parent know your address or phone number.

You do not have to complete this form. You can tell CSA the details by phoning us on 131 272.

CSA 1655.06.05

Source: CSA, *Child Support assessment application*.

2.23 Some forms examined would benefit from revision to improve the start. For example:

- Form 2, *Farm Help claim*, is not conducive to a quick start, as there are six pages of introductory guidance notes, much of which could be incorporated in the form;
- introductory material on Form 3, *Newstart Allowance claim*, lists nine other forms which may have to be completed depending on the person's circumstances, but page three of the form does permit a quick start on basic personal details. Centrelink advised the ANAO in October 2005 that most jobseekers would not be required to complete this form. Instead, they would be directed through a staff-assisted process;
- introductory information on Form 4, *Youth Allowance claim*, appears minimal, although the preparatory steps to form completion, outlined at page 2 of the form, could be time consuming. The first question on the form 'classifies' the applicant and so provides an impression that the form was designed to meet the agency's needs rather than to communicate with an individual. The subsequent questions on the form do not follow closely the familiar pattern of name and birth details;
- the first page of Form 7, *Child Support assessment application*, is used to outline who should and should not use the form; however, the first questions on the form follow a conventional 'quick start' pattern;
- Form 8, *Child Support change initiated by CSA*, and Form 9, *Child Support special circumstances application*, have not kept introductory material to a minimum, with the first 10 pages providing detailed explanations of the process. The CSA advised the ANAO in October 2005 that its clients had requested that grounds for changed assessment be presented at the front of the booklet. The ANAO considers, nonetheless, that there are negative impacts on form users of lengthy introductory material; and that there may be benefits in finding an alternative means of presenting the information;
- the first question on the privacy statement at the front of Form 8, *Child Support change initiated by CSA*, asks for the CSA case number, rather than name and contact details, which are easier for the person to complete; and

- similarly, the first question on Form 12, *Medicare Smartcard registration*, asks for the Medicare number rather than name and contact details.

2.24 The ANAO considers that addressing the above design issues could improve the effectiveness of these forms and would not be costly for agencies, as online forms could be easily amended and hardcopy forms could be changed at the next reprint.

2.25 Centrelink advised the ANAO in October 2005 that the concept of a quick start is sound; however it needs to be balanced with the requirements of duty of care and residual information needs of customers. Centrelink advised that it considers that:

Obtaining the information at the first point alleviates the need for the customer to have an additional contact for the purpose of obtaining the information needed to assess their support needs. For example, the *Youth Allowance claim* form requires parents of dependant claimants to provide bank details, income details and sign the claim form. Although in theory these parts of the claim form could be removed and issued separately to the parent, it is considered that this would make it more difficult and time consuming for customers to complete the new claim process.

Claim information products have been split out from the questions so as to simplify the logic of the form and ease its completion by the customer. The information product provides the information a customer needs to fill out the form and allows the customer to retain the information for further reference after submitting the form. This also allows for the complexity to be removed and keeps the form uncluttered and allows for more commonality of look and feel.

2.26 The ANAO acknowledges that agencies' design approaches may be responding to client needs for contextual information. For example, the CSA also advised the ANAO that its clients had advised it that they needed more information about child support processes. Nonetheless, quick start design can be compatible with explanatory information provided in the form, as illustrated in Figure 2.4 above.

2.27 The ANAO suggests that, if not already doing so, agencies revise their main forms, to take account of good practice, as follows:

- keep introductory material to a minimum, and making sure it is well laid out and clear;
- provide guidance in a separate booklet or document if the guidance is extensive;
- use features such as icons and diagrams at the outset of the form, to enable the applicant to quickly acquire the minimal information that is needed to begin filling it out;
- order the early questions so that the form user gains a sense of progress; and
- place the agency's confidentiality or privacy undertakings at the beginning of the form.

Length

2.28 Focus group research undertaken for this audit identified unduly long forms and bulky information packs as characteristics of difficult forms. Community organisations suggested to the ANAO in the course of this audit that Government forms need to be short and simple. Ideally, forms should be kept as short and concise as possible. As well as being user-friendly, short forms offer savings in printing, storage, handling and distribution costs.

2.29 Complexity of legislation and policies can have an impact on the length of forms and the associated information packs. The forms examined in this audit varied considerably in length, from three pages to 36 pages (see Figure 2.7). When coupled with the guidance material, the combined number of pages of material associated with each form ranged from four pages to 68 pages. The largest form package reviewed in this audit was 40 pages.

Figure 2.7**Number of pages of forms and guidance**

	ABS	Centrelink ^a					CSA				Medicare Australia	
Form Number	Form 1	Form 2	Form 3	Form 4	Form 5 ^b	Form 6 ^b	Form 7	Form 8 ^c	Form 9	Form 10	Form 11	Form 12
Form	16	12	23	36	na	na	7 ^d	6	27	27	3	4
Guide	15 ^d	7	23 ^e	32 ^e	na	na	1	1	13	13	1	4
Form package	16	20 ^f	23	36	na	na	8 ^d	7	40	40	4	8

Notes: (a) Excludes any additional modules that may be required for Centrelink forms.

(b) Forms 5 and 6 are electronic interactive channels.

(c) Form 8 includes a perforated half-page privacy section that is detached when the completed form is received by the CSA.

(d) The paper version of Form 7 comprises 8 pages. The website PDF version prints to 11 pages.

(e) Guidance notes are provided in a separate publication from the form.

(f) Package includes a blank page separating guidance notes from the form.

Source: ANAO review of the audited forms.

2.30 Many factors can influence the content of a form, including the need to meet all applicable legislative, policy and administrative requirements. Ultimately, the choices made about the content drive the length of the form. Eliminating any unnecessary content is the key to shorter forms.

2.31 During the audit, the CSA initiated a review of its processes for changing child support assessment in special circumstances, relevant to Forms 8, 9 and 10.

2.32 Centrelink has adopted a modular approach for some forms. It has also developed abridged claim forms so that people reapplying for benefits do not have to resupply certain information already held by the agency. Medicare Australia receives electronic information from the Department of Immigration, Multicultural and Indigenous Affairs, which simplifies the Medicare enrolment process for new arrivals to Australia. Centrelink and the CSA also use face-to-face and telephone interviews to complete forms. This can simplify the process for customers, as agency staff can determine which questions are relevant in the customer's particular circumstances.

2.33 To facilitate efficient and effective form design, agencies generally could use existing electronically captured data on how many people complete each specific answer field on their forms.²⁰ This information can inform decisions on the level of customer segmentation and the need for separate forms, as well as the ordering of questions in the form. Centrelink advised the ANAO in October 2005 that its approaches to obtaining customer data might not support analysis of clients' completion of form fields.

2.34 To design short, concise forms, agencies should also consider:

- rationalising the content of the form and guidance material;
- turning long, multi-use forms into separate forms or modules tailored for specific groups; and
- streamlining agency business processes to reduce the content required in forms or obviate the need to use a form.

Reading ease

2.35 English literacy levels vary across the general population in Australia. In addition, Australian Government agencies deliver services to some of the most vulnerable groups of people in our society.²¹ It is therefore important that agencies aim to maximise the inherent reading ease and appeal of their forms and publications to as broad an audience as possible. It is both courteous to customers and efficient to write Government publications so they can be easily read and comprehended. Accessibility of forms by people with visual or other impairment affecting literacy is discussed below (see paragraphs 2.69 to 2.74).

2.36 The writing style, including the choice of language used in a form, the number of words in each sentence and the length of each paragraph or section, can influence how easy it is for people to read and comprehend a form. Use of complex multi-syllable words, officialese, legalese, jargon, acronyms, and other technical or unfamiliar terms also reduces general readability. Using such language can also alienate readers, who may put off completing the form or turn to agencies' personnel or help lines for assistance and clarification. If

²⁰ Agencies may either key-in, scan-in or have their clients input the data received via forms. Once this information is captured electronically, this data can help in designing the placement of questions on forms and, potentially, segmenting customers into specific groups, using separate modules of forms, where it is cost effective to do so.

²¹ Vulnerable groups include people who: are homeless; have a drug or alcohol dependency; have low levels of literacy or numeracy; have a mental health condition; are Indigenous; and/or come from a diverse cultural and linguistic background.

people do not understand the question, they are likely to skip it or tick that it does not apply.

2.37 The ANAO found that agencies were generally aware of the need to avoid language and vocabulary that may be inappropriate for the wide cross section of form users. However, in practice, the readability of the audited forms could be improved.²² The ANAO reviewed the readability of 11 forms and related products. Most of the sample forms and associated documents scored in the 'fairly difficult' to 'difficult' readability range, according to the Flesch readability tool.²³

2.38 Accordingly, in order to improve the readability of their forms, the ANAO encourages agencies to use readily available software tools to test the readability of their forms and guidance publications. Such testing is not costly and could be conducted in conjunction with the next review or reprint of agencies' forms.

Complexity

2.39 Complex forms can be daunting for people to fill in, are more prone to errors and omissions, and place a higher compliance burden on users, including on their time taken to complete all the requirements of the form.

2.40 Ideally, forms should be designed to be as simple as possible for users. Simple forms do not require users to perform intricate calculations, sort through a large number of confusing options, recall information from the distant past, or assemble and assimilate a large range of information, in order to complete the form. If some such information is required, additional guidance or personal assistance should be available to those who might have difficulty completing the form. In the case of electronic forms, quick links can provide access to relevant explanatory material, including examples.

²² For example:

- Form 1, the *Census Household Form 4*, uses some terms that are not in everyday use, such as 'communication activities' (Q19). The meaning of 'ancestry' (Q15) may confuse some users and the acronym 'AQF' (Q26) would not be familiar to some people;
- the guidance material in the first six pages of Form 2 (*Farm Help* claim) is detailed and legalistic. A plain English summary at the front of the form with more detailed statements later in the form could be more effective in maintaining user motivation to complete the form;
- technical terms used in Form 7 (*Child Support registration application*) such as 'parenting plan' and 'child support assessment' are presumed to be understood by the person completing the form; and
- some legalistic and complex language is used in Form 9 (*Child Support special circumstances application*), for example, at Reason 9 and Reason 10.

²³ A tool for assessing the general readability of documents is included in popular word processing software packages. The ANAO used the Flesch readability test incorporated in Microsoft Word.

2.41 Not surprisingly, the forms examined in this audit ranged in complexity, given the varying purpose of each form. Increased complexity was generally correlated with the length of the form and the number of detailed questions asked or pieces of information sought (see Figure 2.8). Forms requiring lots of financial details and the provision of original or multiple copies of documentary evidence tend to be more complex for users. Forms with open questions, such as Form 7, *Child Support assessment application*, Form 8, *Child Support change initiated by CSA*, Form 9, *Child Support special circumstances application*, and Form 10, *Child Support special circumstances response*, can also be more challenging for users to complete, as they convey limited information about the answers expected.

Figure 2.8

Number of questions and pieces of information sought in forms

Criteria	ABS	Centrelink				CSA				Medicare Australia		
	Form 1 ^b	Form 2 ^b	Form 3 ^b	Form 4 ^b	Form 5	Form 6	Form 7 ^b	Form 8	Form 9	Form 10	Form 11	Form 12
Numbered questions ^a	60	36	54	104	0	0	28	15	41	31	8	8
Numbered sub-questions ^a	0	0	11	14	0	0	17	0	0	3	0	0
Total number of questions ^a	60	36	65	118	6+	6+	45	15	41	34	8	8
Pieces of information sought >	200	100	100	200	6	6	100	80	100	100	30	35

Notes: (a) Most forms did not number all questions and/or sub-questions.

(b) For forms numbers 1, 2, 3, 4 and 7, response on behalf of more than one individual has been assumed in calculating the number of pieces of information required to complete the form.

Source: ANAO's review by audit team, focus group participants and a survey expert.

2.42 To simplify form completion, most forms provide a pick list of answers for at least some questions, to enable users to simply tick the appropriate box. Pick lists were extensively used in the forms covered during the audit. However, the ANAO noted that there appears scope to simplify the process of answering some questions on Form 11, *Medicare enrolment application*, and Form 12, *Medicare Smartcard registration*, by adopting pick lists.

2.43 It is a good practice to include a checklist at the end of long or complex forms, especially if documentary evidence or other attachments are required. Checklists were included in four of the larger forms examined in this audit.²⁴ The ANAO considers that Form 8, *Child Support change initiated by CSA*, and Form 9, *Child Support special circumstances application*, would also benefit from the inclusion of a checklist.

2.44 The *Youth Allowance claim* includes a comprehensive checklist of required actions and documentation. An extract from that checklist is reproduced at Figure 2.9.

Figure 2.9

Action and documentation checklist: *Youth Allowance claim*

PART M

Action and document checklist

This checklist will help you ensure that you have all the required documents.

If you require any additional forms referred to in this claim form, call Centrelink on **13 2490** or go to our website at www.centrelink.gov.au



Action Checklist—Youth Allowance Customer

Did you fill in the claim properly?

- ☐ Did you provide your telephone number?
- ☐ If you have a partner did he or she fill in a separate form?
- ☐ Did you (and your partner) provide Tax File Number details in PART J?
- ☐ Did you read, sign and date the Statement in PART K?

Action Checklist—Parent/guardian

- ☐ Did your parent(s)/guardian(s) fill in PART I and provide their Tax File Number(s), their account details (if required) and sign?



Document Checklist—Youth Allowance Customer

Have you provided the right document(s) with this claim?

Proof of identity PART A

- ☐ **Question 2** – Have you provided original documents to show proof of birth in Australia or proof of arrival in Australia if you were born overseas?
(Please refer to the *Information booklet*, which came with this claim.)

Source: Centrelink, *Youth Allowance claim*.

²⁴ Form 1, *Census Household Form 4* (a very short checklist); Form 3, *Newstart Allowance claim*; Form 4 *Youth Allowance claim*; and Form 10, *Child Support special circumstances response*.

2.45 The Census form reminds users to check the completeness of the form, as illustrated in Figure 2.10.

Figure 2.10

Completion prompt: *Census Household Form 4*

55 Finished?

- Please make sure you have not missed any pages or questions.
- Please sign here:

Signature

Date

Source: ABS, *Census Household Form 4*.

2.46 Repetition of key information and questions (for example, to discourage fraudulent claims or breaches of privacy) at the end of the form may be warranted depending on the risks associated with the programme that the form is supporting.

2.47 Many people dislike having to re-communicate information about themselves to government agencies, if they have previously supplied it. Pre-populating significant fields in forms, to the extent possible, before they are sent to people can significantly improve the user-friendliness of forms. Both Centrelink and the CSA have recognised the benefits of such an approach. As mentioned earlier (see paragraph 2.32), Medicare Australia uses available migration data to simplify the Medicare enrolment process for new arrivals to Australia.

2.48 Centrelink has responded positively to a finding from its customer research²⁵ that customers were not satisfied with Centrelink processes that required them to re-present information previously provided to the agency. Two of the forms that the ANAO selected for review in this audit included elements of pre-populated fields. These were: Form 5, *Interactive Voice Response reporting of income and activity* (completed by phone), and Form 6, *Online reporting of income and activity* (completed online).

²⁵ Centrelink, Customer Experience Strategy 2004–2006.

2.49 The ANAO noted that Centrelink and the CSA generate some individualised application forms and/or tailored correspondence following telephone interviews with clients.²⁶

2.50 The ANAO suggests that agencies consider adopting the following practices to design simple forms:

- avoid asking users to perform intricate calculations, sort through a large number of options, recall information from the distant past, or assemble and assimilate a large range of information;
- write instructions and questions in ways that do not assume that the user of the form possesses complex or technical information;
- provide a pick list of answers for at least some questions;
- provide clear, simple instructions and examples of how to respond; and
- provide a checklist at the end of forms, especially where attachments are required.

Effective layout

2.51 Layout is the placement of elements in a given space and format. The way the elements are arranged affects the order in which they are read and how readers recognise and place the information in context.²⁷ Good layout provides a logical flow and assists users to fill out the form accurately and with ease. To do this requires appropriate navigation aids that provide clear delineation between the instructions or guidance material, the relevant questions to be addressed, and the spaces provided for the answers.

2.52 As well as being easily locatable, the answer spaces need to provide sufficient room for the range of anticipated answers,²⁸ recognising that some users may have larger than average handwriting, and some people may be less succinct in their responses than others. A facility for respondents to provide additional comments is helpful. Placement of regularly occurring elements, such as questions and answer boxes, should be consistent, aligned and predictable. Providing guides or grids can also make filling in numbers easier.

²⁶ The front covers of Form 2, *Farm Help claim*, and Form 7, *Child Support assessment application*, advise users that it is possible to complete these forms by telephone.

²⁷ Snooks and Co, op. cit., p. 307.

²⁸ The Style Manual provides guidance on minimum space requirements, including a list of examples for common response fields. *ibid.*, p. 36.

2.53 Form 1, *Census Household Form 4* (used to trial Census questions) invites feedback on respondents’ experiences, as shown in Figure 2.11.

Figure 2.11
Invitation to comment: *Census Household Form 4*

Did you find any of the test questions difficult? Please write the question number and give the reasons:

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

Source: ABS, *Census Household Form 4*.

2.54 The overall layout of the forms should create favourable responses from users.²⁹ Simplicity, visual balance, brevity and clarity are important, as is the choice and placement of colours used. Icons, symbols and diagrams can help users navigate the form, in addition to minimising the quantity of text required. Headings and labels act as signposts. Their wording needs to trigger the correct expectation in readers, by mirroring the thinking and language of intended users, rather than the form’s author.³⁰

2.55 Well-designed forms aim to keep branching or question skips to a minimum, so that users do not have to navigate between questions and sections not relevant to them. Where skips are necessary, these should be adequately signposted to enable users to correctly locate the next question to be answered. Forward navigation flow avoids the need for users to check back through the form for either clarification or to check accuracy and completion.

2.56 Achieving successful design and layout of a form is not a simple task. In practice, most agencies engage the services of graphic design experts for the design of their significant forms.

²⁹ Colour, relative size and positioning are the main determinants of attraction. Eyes are attracted to bright colours first, then to darker and muted colours. People also tend to be attracted to larger, and thus easier to read, elements before graduating to the smaller elements. *ibid.* p. 310.

³⁰ *ibid.*

2.57 The ANAO's observations in relation to the layout of the forms reviewed in this audit are set out in Figure 2.12.

Figure 2.12

Observations on the design and layout of the audited forms

Form	Observation on the design and layout
ABS	
Form 1, <i>Census Household Form 4</i>	<p>The form is generally well laid out, with shading used to guide the person to the sections that require completion.</p> <p>This form is designed for electronic scanning, which adds some complications because instructions are required on how to complete certain boxes. It also contains multiple branches, for example, there are 10 potential skips between Q30 and Q31.</p> <p>The form requires users to flip back to the first page to find who they have provided details for in each column. This could be rectified by including a field at the top of each column to allow users to record which column of information belongs to each household member.</p> <p>People with colour blindness find some of the colours in the information booklet difficult to see.</p> <p>Explanations or assistance (as in the hard copy version of the form) are easily available and clearly laid out.</p> <p>The form allows for an online completion option, which was easy to follow.</p> <p>A new eCensus product was under development at the time of the audit.</p>
Centrelink	
Form 2, <i>Farm Help claim</i>	The layout could be streamlined (details advised to Centrelink).
Form 3, <i>Newstart Allowance claim</i>	The form uses icons and colour to help navigation.
Form 4, <i>Youth Allowance claim</i>	This form has a cluttered appearance and some parts (E and G, study and independence) may be confusing to answer and to work out the next question to be answered.
Form 5, <i>Interactive Voice Response reporting of income and activity</i>	<p>The length of the phone reporting option depends very much on the type of information that has to be reported, but would typically be around five minutes for an average report.</p> <p>Interactivity makes the form completion process user-friendly (because the skips are managed by the machine, not the person completing the form, who may be unaware of any skips occurring).</p> <p>There is instant lodgement and confirmation of receipt.</p>

Continued next page

Form	Observation on the design and layout
Form 6, <i>Online reporting of income and activity</i>	<p>The online report has been designed to mirror as closely as possible the paper form, so that the sections correspond to sections within the hard copy form.</p> <p>The online form is organised into 'pages', as in the hard copy version, from which the person can either choose to go forward or back or cancel their entry, as appropriate.</p> <p>The use of 'pages' rather than a scroll-through format make the transition from hard copy to online reporting easier for those familiar with the hard copy format. The use of buttons to give 'yes' or 'no' answers facilitates navigation through the form.</p>
CSA	
Form 7, <i>Child Support assessment application</i>	More consistency in the placement of text boxes and the numbering system for questions and sub-questions would improve the layout of the form.
Form 8, <i>Child Support change initiated by CSA</i>	The form is well laid out. However, its foldout format may risk some sections being overlooked. The form may also be more difficult for some people to manipulate than a conventional style form.
Form 9, <i>Child Support special circumstances application</i>	This form would be improved by providing greater clarity on where questions begin and end, to help in successfully navigating the form. Visual appeal could be improved, by moving some of the detailed information to a separate information sheet.
Form 10, <i>Child Support special circumstances response</i>	<p>This form would benefit from simplification of its design, perhaps by dispensing with those parts of the form that are not relevant to the responding parent, thus making it easier for users to navigate.</p> <p>The form requires a lot of information to be provided—open-ended comments and explanations, as well as detailed factual information such as income and assets. In the case of Q9, three questions are preceded by a dot point. If these are sub-questions, it would be clearer to label them a, b, and c.</p>
Medicare Australia	
Form 11, <i>Medicare enrolment application</i>	The layout on this form is clear. Nonetheless, the form would benefit from more bold type to highlight key words and messages.
Form 12, <i>Medicare Smartcard registration</i>	The layout on this form is generally clear. Small size print was difficult to read.

Source: ANAO's review by audit team, focus group participants and a survey expert.


2.58 Navigation of the *Newstart Allowance claim* is assisted by the presentation of alternative scenarios, while paper clip icons encourage completion of form requirements. This is illustrated in Figure 2.13.

Figure 2.13

Layout using scenarios and icons: *Newstart Allowance claim*

15 Do you have any illness, medical condition or disability which prevent you working at least 8 hours per week?

No ☐ Yes ☐

 You will need to attach evidence (e.g. medical certificate).

Details of illness/medical condition/disability

Date illness/medical condition/disability occurred / /

Is this condition temporary? No ☐ Yes ☐

No ☐ Contact Centrelink, you may need to complete a claim for Disability Support Pension.

Yes ☐ Do you expect you will be fit to return to work within 2 years?

No ☐ Contact Centrelink, you may need to complete a claim for Disability Support Pension.

Yes ☐

Source: Centrelink, *Newstart Allowance claim*.

2.59 When designing forms, it is often useful to seek the views of relevant community organisations. Figure 2.14 lists the suggestions made by community organisations to the ANAO about characteristics of effective form layout.

Figure 2.14

Community organisations' suggestions for effective form layout

Form layout
<p>Effective forms:</p> <ul style="list-style-type: none"> • have a simple layout; • use layout and vocabulary aligned with the literacy and comprehension abilities of the persons completing the forms; • provide adequate space for insertion of client information; • are presented in large font and use easy-to-read colours; • provide response 'pick list' categories that are meaningful to the persons completing the forms; and • signpost the questions to assist clients to avoid answering irrelevant questions.

Source: ANAO's consultations with community groups.

Form logic

2.60 Sequencing of concepts covered in form questions can increase the speed and accuracy of reading and completing answers, as well as generating a good data flow. Design factors that can facilitate a logical sequence of questions include:

- establishing interrelationship between topics so that the user can visualise a picture forming from the flow of questions;
- anticipating user's reading patterns, especially left to right, top to bottom in English. If material is published in another language (for example, Chinese), a different form logic is likely to be required.

2.61 Wherever possible, items should follow conventional and familiar sequences such as name, address and phone number. Questions should appear in a logical order that avoids the need for users to flip back and forth as they complete the form. To achieve a good logical flow, the questions should adopt a consistent and predictable sequence throughout the form. It is good practice to place the questions that apply to most people up front, with the questions that apply to only some groups further down in the form.

2.62 The ANAO found that the forms examined generally had adopted effective form logic and the questions were appropriately grouped. However, the following exceptions were noted:

- Form 12, *Medicare Smartcard registration*, lacks logical flow in question sequencing. The third question (contact details) runs over two pages. Security messages for verifying the identity of people using secret questions and secret answers also interrupt the logical flow. In addition, it is difficult for users to include a dependant child's details because the questions do not specifically cater for this situation; and
- the sequence of 'Yes' and 'No' answer boxes continually alternate in Form 7, *Child Support assessment application*. Form 10, *Child Support special circumstances response*, on one page has 'Yes' and 'No' boxes for answers and in other parts of the same page instructs users to write 'Yes' or 'No' answers.

2.63 The ANAO noted that there are inconsistencies in the way the forms it examined asked for basic personal details. For example, the order of placement of first and family names across many forms varied, as did the terminology for these names (surname, family name, first name and given name). This can be confusing for clients accessing services from more than one of the Human Services agencies simultaneously.

2.64 Figures 2.15, 2.16, 2.17 and 2.18 below are examples of differing approaches to name identification in the Human Services agencies.

Figure 2.15

Name identification: *Youth Allowance claim*

Title	Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other <input type="text"/>
Family name	<input type="text"/>
First given name	<input type="text"/>
Second given name	<input type="text"/>

Source: Centrelink, *Youth Allowance Claim*.

Figure 2.16

Name identification: *Child Support assessment application*

Application for Child Support Assessment

Please write neatly in BLOCK LETTERS

Tick where applicable ☒

About you — the person applying for a child support assessment

1 Your name

Title Mr ☐ Mrs ☐ Miss ☐ Ms ☐

Surname

Given names

Source: CSA, *Child Support assessment application*.

Figure 2.17

Name identification: *Child Support special circumstances assessment response*

CSA case number

Your name

Title ☐ Mr ☐ Mrs ☐ Miss ☐ Ms

Family name

Given names

Your previous name

Source: CSA, *Child Support special circumstances assessment response*.

Figure 2.18

Name identification: *Medicare enrolment application*

1 Your full name

Mr ☐ Mrs ☐ Miss ☐ Ms ☐ Other

Family name

First name

Second name

Source: Medicare Australia, *Medicare enrolment application*.

2.65 In summary, the ANAO suggests that agencies consider adopting the following practices to design forms that have a logical flow of questions:

- adopt a consistent and predictable sequence throughout the form;
- follow conventional and familiar sequences such as name, address and phone number;
- keep branching and question skips to a minimum, but adequately signposting those that are required;
- avoid the need for the user to flip back and forth between questions; and
- place questions that apply to most people up front, with the questions that apply to only some groups further down in the form.

Legibility

2.66 Forms with small print sizes, decorative fonts, italics, a large amount of capitalised text, long line lengths, close line spacing or poor colour and shading contrast can reduce legibility for many people, including the elderly and others with vision impairment. Even for people with excellent vision, there is a danger that something important might still be missed, resulting in incomplete or inaccurate information on the form.

2.67 Approaches to optimise the legibility of forms include:

- obtain expert guidance on legibility through Vision Australia and similar bodies;
- use colours visible to those with vision impairment;
- use borders and shading, font size and spaces that aid legibility; and
- avoid small print sizes, decorative fonts, italics, a large amount of capitalised text, long line lengths, close line spacing or poor colour and shading contrast.

2.68 The ANAO found that most of the forms examined had one or more characteristics that reduced their overall legibility.³¹ The ANAO provided the audited agencies with detailed assessments of the legibility of the audited forms. Legibility issues could be addressed easily in the next review of the forms.

³¹ For example:

- Form 1 uses a large amount of capitalised letters. Legibility would be assisted by stronger delineation of borders and larger font. The notice of assistance to those who are visually impaired would be better in a larger font than surrounding text;
- Form 2 uses long lines of text in small font;
- Forms 3 and 4 use colours with insufficient colour contrast to meet accessibility standards, notwithstanding Centrelink's advice to the ANAO that the colours used in its forms are well researched and tested;
- Forms 8, 9 and 10 use small fonts and italics. Legibility would be assisted by borders around response boxes; and
- Forms 11 and 12 use small font and italics. Legibility would be assisted by a neutral background colour.

Accessibility

2.69 For forms and information about government programmes and services to be accessible to the public, they need to be provided in a range of styles or formats that take account of the particular needs people may have as a result of their cultural background, language, literacy constraints, physical or mental disability,³² or geographic location. Inadequate consideration of these factors in the design of forms may limit access to information that is critical to enable the accurate and independent completion of a form.

2.70 Agencies can use various methods to achieve accessibility of forms and associated programme information. These include: translation into other languages; telephone-assisted form completion; online access; and provision in various alternative formats, such as large print, Braille, audio and Easy English.³³ As a minimum, where agencies' websites contain forms and related information packages in only one format, such as PDF, there should be an easily located notification that alternative formats are available. Details of how members of the public can access the alternative formats, such as by telephone call or email to a nominated contact officer, should also be shown.

2.71 Sound practices in providing accessible formats in forms, for those who experience visual or other impairment affecting literacy, are outlined at Appendix 2.

2.72 In some circumstances in which a form user is unable to complete a form unassisted, assistance from agency personnel is an appropriate strategy. Stakeholders groups advised the ANAO that interaction with clients was a key to improving accessibility. Figure 2.19 outlines key components of interaction between agency staff and clients to improve accessibility, according to community groups.

³² A disability may be attributable to intellectual, psychiatric, cognitive, neurological, sensory or physical impairment, which leads to a substantial reduction in the person's capacity for communication, social interaction, learning or mobility. With an ageing population, the proportion is growing. Human Rights and Equal Opportunity Commission, *Disability Rights*, World Wide Web Access: Disability Discrimination Act Advisory Notes, Ver. 3.2, Human Rights and Equal Opportunity Commission, Sydney, August 2002, available from <www.hreoc.gov.au/disability_rights/standards/www_3/www_3.html> [accessed 22 September 2005].

³³ The Commonwealth Disability Strategy includes provision of information in 'easy English' formats. In this format, information is summarised and expressed in short sentences, and each conveys a single idea or concept. Use of cartoons, icons and pictures may also aid communication with some client groups. Department of Family and Community Services, *Commonwealth Disability Strategy* [Internet]. Department of Family and Community Services, Canberra, 2003, available from <http://www.facs.gov.au/disability/cds/cds/cds_index.html> [accessed 22 September 2005].

Figure 2.19**Stakeholder organisations' suggestions for improved agency interactions with clients about forms**

Interactions with clients
<p><i>Interaction involving forms is improved if the agency:</i></p> <ul style="list-style-type: none"> • staff only ask for information that is necessary to complete the form; • provides forms and associated information in appropriate languages (which may vary in each State and Territory); • provides adequate staff training, including in presenting services to various client groups; • includes a completion checklist in its forms; • provides options for people needing help with form completion (independent of the agency); and • staff demonstrate disability/accessibility awareness, understanding and respect.

Source: ANAO's consultations with community groups.

2.73 The ANAO found that each of the audited agencies had an awareness of accessibility issues and had taken some steps to make their forms accessible. However, there were numerous barriers remaining and many people with a print disability would not be able to complete the required forms with the same degree of privacy and security as people without disabilities. The ANAO suggests that agencies consider expanding the range of alternative formats offered, particularly to include a wider availability of material in audio formats, to meet the needs of migrants and people with generally low literacy skills. As well, agencies could use the tools available to assess the reading ease of their forms and publications (see paragraphs 2.35 to 2.38).

2.74 The ANAO provided the audited agencies with the expert accessibility assessments of the selected forms undertaken as part of the audit.

2.75 The CSA advised the ANAO in October 2005 that it accepts the findings for potential improvement in the useability of its forms. The CSA will focus on the useability criteria identified in this audit report in improving its forms. In addition, the CSA was addressing the matter of accessibility of its forms, in collaboration with relevant experts. As well, a new website for the CSA, due for release in late 2005, would be tested for accessibility and useability. Anticipated accessibility improvements would include:

- an improved navigation menu, to enable navigation without using the computer mouse;
- creating large-font rich text format files, which are expected to be better for users of assistive technologies and those with vision impairment;
- capacity to magnify text;
- navigational support for assistive technologies (for example enabling 'skip to content' rather than navigating each page of a website); and
- working with other Human Services agencies, to develop approaches supporting a 'common user experience' across the websites of the agencies covered by the Department.

Supplementary analysis of selected agencies' forms

2.76 This chapter has reported the results of the analysis undertaken by the ANAO, and the views of key stakeholder groups, relating to the useability of forms. This section briefly reports supplementary analysis of the useability of selected agencies' forms, undertaken by focus groups for this audit. It also draws on work already completed by the agencies.

Focus group findings

2.77 Focus groups' reviews of the forms, conducted for the ANAO, confirmed that most of the forms are effectively designed, comprehensible and user-friendly. Strong positive comments were offered on some of the forms, notably Form 1, *Census Household Form 4*, and Form 2, *Farm Help claim form*.

2.78 Nonetheless, suggestions for improvement were made for most forms. Some forms were not well regarded by focus groups—notably Form 9, *Child Support special circumstances application*, and Form 10, *Child Support special circumstances response*, related to the change of child support assessment in special circumstances and Form 12, *Medicare Smartcard registration form*.

2.79 The focus groups also identified a range of detailed suggestions for agencies to consider in improving the impact of their forms (conveyed to agencies during the course of the audit).

2.80 However, it is possible for a form to be effective in eliciting information, yet not engender a sense of satisfaction with the form in the applicant. For example, one focus group found that most participants could correctly complete and navigate through each of the Centrelink forms tested in

the focus group.³⁴ However, participants' satisfaction with the forms did not match their accuracy in completing the forms. On completion of forms, the focus group participants were asked how satisfied or dissatisfied they were with the design of the forms and ease to complete. Focus group participants' responses are shown in Figure 2.20.

Figure 2.20

Focus group members' satisfaction with Centrelink forms

Rating ^a	Form 2, <i>Farm Help claim</i>	Form 3, <i>Newstart Allowance claim</i>	Form 4, <i>Youth Allowance claim</i>
Satisfied	Six in ten	Five in ten	Three in ten
Neither satisfied or dissatisfied	Four in ten	Three in ten	Six in ten
Dissatisfied	Nil	Two in ten	One in ten

Note: (a) Ratings are indicative, based on qualitative answers, not actual participant numbers.

Source: Focus groups convened for this audit.

2.81 These findings (albeit limited to one session for each form) indicate that, among the participants in those focus groups, Form 2, *Farm Help claim*, achieved the highest level of satisfaction, followed by Form 3, *Newstart Allowance claim*. Nonetheless, all three Centrelink forms tested in the audit were well received overall. This result is consistent with Centrelink's processes to market test its forms.

2.82 Of the CSA forms:

- Form 7, *Child Support assessment application*, was considered to be clear and comprehensible to the reader. All of the single parents in the focus group correctly completed this form and could correctly navigate through the form;
- Form 8, *Child Support change initiated by CSA*, was completed with ease and accuracy and was successfully navigated. Nonetheless, focus group participants expressed reservations about the 'fold-out' style of the form;

³⁴ Although three out of eight young people had one incidence each of following an incorrect navigational sequence, the overall conclusion is that the design of the *Youth Allowance claim form* is successful, and young people can usually proceed through the form answering correctly despite some navigational and comprehensive difficulties. Despite a couple of questions causing problems for some people when answering some of the questions on the *Newstart Allowance form*, most of the participants could readily navigate through the form and correctly complete it.

- Form 9, *Child Support special circumstances application*, was easy for people to understand but difficult to complete. Analysis of form completion found that half of the non-custodial parents did not correctly complete the form. All of the forms completed by the non-custodial parents in the focus groups were incorrectly navigated. Discussion with the custodial parents in the focus group confirmed that they also found Form 9 difficult to navigate; and
- Form 10, *Child Support special circumstances response*, was difficult for some people to complete because it appears lengthy, disjointed in questioning, and difficult to work out how to answer. The young men in the focus groups (18-24 years) identified that the form was designed successfully, and they gave strong positive ratings. The older men (aged up to 45 years), however, found the form more difficult to understand and to complete. Although older respondents experienced difficulty in completing the form, they generally seemed to be on the 'correct' navigation sequence path to successfully complete the form. This form evidently requires quite a deal of form design attention to improve clarity, comprehension and ease of navigation, and to improve question relevance.

2.83 The audit's focus group identified that Form 11, *Medicare enrolment application*, was well designed, easy to complete, to navigate through, and to answer correctly. Nonetheless, some suggested improvements were identified. In contrast, Form 12, *Medicare Smartcard registration*, and associated instructions were perceived as disjointed in logical flow and poorly designed. The focus group identified a range of suggested enhancements to improve the clarity, comprehension, and navigational flow of the form.

2.84 The focus group process, albeit limited by the small scale of this testing, indicates the benefit agencies might gain from market testing their forms. It is unlikely to be a coincidence that focus groups responded more positively to forms that had already been tested by the sponsoring agencies (ABS and Centrelink) compared with the less positive perceptions of some of the forms in the agencies that had not recently market tested their forms (the CSA had trialled its change of assessment forms in 1999 and Medicare Australia had trialled its Medicare enrolment form in 2002).

Findings from research of selected agencies

2.85 Of the audited agencies, Centrelink is the only one that had tested customers' attitudes to its forms as a whole. Significant findings from customer research relevant to forms reflected in *Centrelink's Customer Experience Strategy 2004-2009* (the Strategy), include that:

- 44 per cent of customers were either ambivalent or rated the length of Centrelink forms as poor or unacceptable;
- 29 per cent were either ambivalent or rated the wording of Centrelink forms as poor or unacceptable; and
- 29 per cent were either ambivalent or rated the number of Centrelink forms as poor or unacceptable.³⁵

2.86 Similarly, 'unclear, irrelevant and excessive forms and paperwork' were consistently among the top six irritants identified through Centrelink's programme of facilitated focus groups in the years preceding the development of the agency's Customer Experience Strategy. Responding to these findings, the Strategy identified 'simple, clear and properly targeted forms and paperwork' as an area of focus, because of their impact on calls to Centrelink.³⁶

2.87 The levels of satisfaction with the various Centrelink forms tested in the audit (see Figure 2.20) were consistent with the results of Centrelink's own research.

2.88 Centrelink advised the ANAO in October 2005 that it had commenced a review of its claiming process and associated forms. The objective of that review is to streamline claiming processes and address customer concerns.

³⁵ An ANAO audit of Centrelink's customer satisfaction surveys found that the survey objectives for Centrelink's customer satisfaction surveys do not include accuracy requirements, and that over half of customer records were excluded from being considered for the sample for the telephone-based survey. Exclusions included people who had no telephone, or had a silent number or who had only a mobile telephone or who lived in an institution. The ANAO identified a potential for bias in responses (for example, due to privacy or confidentiality concerns) and scope for stronger quality assurance. The audit is ANAO Audit Report No.33 2004–05, *Centrelink's Customer Satisfaction Surveys*.

³⁶ As an example, a new consolidated and shortened customer form is being developed to replace the multiple forms currently completed by families. The proposed combined process will mean that families having a new baby can claim family assistance and, at the same time, add their new child to their Medicare card and Medicare Safety Net record. Families already getting family assistance or registered for Medicare Safety Net do not need to repeat information that has already been provided. The family assistance and Medicare claim process is tailored to the family's circumstances, and important aspects of the family assistance system can be emphasised to new families through personal contact.

Overall conclusions on user-friendliness of forms

2.89 Overall, the ANAO concluded that agencies' forms were generally effective and user-friendly. The ABS' and Centrelink's achievement of user-friendly design features in relation to necessarily long and complex forms most frequently relied on clarity of purpose, effective layout and logical sequencing.

2.90 The strength of Medicare Australia's *Medicare enrolment application* lies in its brevity and logical simplicity. However, the ANAO identified significant scope for improvement in relation to the design of the *Medicare Smartcard registration* form and the associated instructions to applicants. Medicare Australia advised the ANAO, in late August 2005, that the form was under evaluation.

2.91 Telephone-based application for child support assessment has largely replaced the use of paper forms for assessment of child support. However, paper forms will be needed by clients of the CSA who are unable, or do not wish to, avail themselves of the telephone-based application. The CSA's paper forms featured some design strengths, but were generally less well designed than those of the ABS and Centrelink. A review of the change of assessment in special circumstances process used by the CSA was commenced at the time of the audit.

2.92 The CSA also advised the ANAO in October 2005 that it was investigating the feasibility of piloting a telephone application for changed assessment in special circumstances, commencing in 2006. The aim of the pilot would be to eliminate the need for paper-based review of change of assessment in special circumstances. It would be appropriate that form design issues are considered in that context. The CSA advised the ANAO in October 2005 that all references in this report to the forms associated with changed assessment in special circumstances would be actioned in conjunction with its process review.

2.93 There was a strong commonality between the suggestions made by the community groups to whom the ANAO spoke during this audit; the suggestions of the focus groups convened by the ANAO; and the indicators of effective form design developed for this audit. The ANAO suggests that agencies give consideration to design features that will enhance the user-friendliness of forms, including:

- developing and testing a form logic that is easy for clients to understand and follow;
- avoiding complex numbering of sections and questions;
- pre-populating significant fields, to the extent possible;
- using navigational aids³⁷ to increase readability and to strengthen messages of required documentation;
- using user-friendly design features, such as light coloured paper, black ink for questions, coloured ink (suitable for vision-impaired readers) and font sizes appropriate to the client groups; and
- testing the useability of their forms from the perspectives of client groups who have special needs.

³⁷ Examples include: coloured type directions to guide 'skip' instructions; questions within columns separate from instructions/other information; icons such as paperclips; and a facility for respondents to provide additional comments when completing forms.

3. Practices that Support the Design of Effective Forms

This chapter examines some of the practices that support the design of effective forms, and presents the ANAO’s findings and observations on the practices for designing forms, in the four agencies selected for review in the audit.

Introduction

3.1 There are a number of critical business practices and processes that increase the likelihood that forms will satisfy agencies’ communication and business requirements (see Figure 3.1).

Figure 3.1

Audit criteria: practices that support effective form design

Criterion	Indicator of sound practice
Form design is based on understanding clients’ requirements for effective communication using forms	Research is undertaken into client communications needs and preferences, especially relating to language and overall format of the form; and community consultation is conducted to identify communication needs and preferences.
Form design and dissemination take account of clients’ preferred communication channels effectively	Clients’ preferences in communications channels (modes) are researched and accommodated; and forms placed on agencies’ websites are discoverable (that is, able to be found easily).
Form design and review processes are effectively managed	The agency has established clear responsibility for forms management by a designated Forms Officer; the agency has developed and implemented systematic form design, testing and review processes; systematic processes gather information from across the agency relevant to form design and review; appropriate expertise exists in the design team; adequate consultation occurs between ‘content owners’ in the agency and the design experts; and expenditure on form design and review is actively managed.

Source: Audit criteria were derived from the sources listed at paragraph 1.18.

3.2 The findings in this chapter are based on an assessment of the audited agencies’ practices for form design against the criteria presented in Figure 3.1.

Forms design supporting effective communication

3.3 Forms' effectiveness depends on their appropriateness to the communications capabilities and preferences of the user. Good form design involves more than applying theoretical principles. It necessitates well-founded information about the communications needs and preferences of the client group for whom the form is being designed.

3.4 The audit findings on agencies' processes supporting the use of forms for effective communication with their clients are summarised in Figure 3.2.

Figure 3.2

Agencies' processes to understand user needs for form design

Indicator of sound practice	ABS	Centrelink	CSA	Medicare Australia
Research is undertaken into client needs and preferences for form design	■	■	▣	□
Community consultation is conducted to identify communication needs and preferences of the agencies' client groups	▣	■	□	□

Legend: ■ Substantially met ▣ Met for some forms only ▢ Partially met □ Largely not met

Source: ANAO assessment.

3.5 The remainder of this chapter outlines the extent to which agencies met the indicators of good practice associated with each criterion.

Clients' communications needs and preferences are researched

3.6 Approaches to identifying client communication needs and preferences can range from broad demographic profiles of clients, to specific research on a particular client group's needs, to information-gathering on client reaction to individual forms. In addition, there are opportunities in the course of daily business for agencies to gather information about clients' perceptions of its forms.

3.7 Research methodologies that can support effective communication through form design include research of clients' communications preferences generally, stakeholder feedback, surveys, focus groups and useability analysis. It is important that agencies use a range of research approaches because individual methodologies may have inherent limitations; such that sole reliance on any one of them may result in incomplete or misleading views of

clients' communication preferences. It is also important that agencies carefully consider the results of research. Figure 3.3 summarises approaches of the audited agencies to gathering client feedback.

Figure 3.3

Agencies' processes to gather information about clients' form needs

Process	ABS	Centrelink	CSA	Medicare Australia
Research profile of communications needs of client group or sub-groups	■	■	□	□
Customer Service Officers' feedback	■	■	■	■
Ministerial and departmental correspondence	■	■	■	■
Call Centre feedback	■	■	■	□
Client feedback/Complaints	■	■ ^a	■	■
Client surveys	□	■ ^b	□	□
Staff identification of opportunities for improvement	■	■	■	■
Analysis of completion patterns	■	■	□	□

Legend: ■ Substantially met ■ Met for some forms only □ Partially met □ Largely not met

Notes: (a) Centrelink captures client feedback and complaints related to forms and other service issues. However, as reported in ANAO Audit Report No.34 2004-05, *Centrelink's Complaints Handling System*, Centrelink's data on complaints is incomplete due to limitations in its customer feedback database and procedures (see pages 56-61 of the report).

(b) ANAO Audit Report No.33 2004-05, *Centrelink's Customer Satisfaction Surveys* identified scope for stronger quality assurance.

In 2003, Centrelink commissioned specific research into its customers' preferences for when they interact with the agency. This research concluded that forms did not have a significant impact on satisfaction with the overall quality of Centrelink's people, services and information. However, 'unclear, irrelevant and excessive forms and paperwork' were consistently among the top six irritants identified through Centrelink's programme of focus groups prior to the development of Centrelink's *Customer Experience Strategy 2004-2009* (see paragraph 2.86).

Source: ANAO assessment.

3.8 Each of the agencies gathers information about their clients' communications needs and preferences, although their approaches to gathering and using that information vary.

3.9 The more sophisticated research approaches are those used by the ABS and Centrelink. The ABS consults with stakeholder groups and develops and

tests each proposed Census question rigorously and over an extended timeframe (sometimes over more than one Census cycle). The scale of the Census and the long-term importance of the data collected in response to the various Census questions merit the investment of significant resources in this research. In addition, the ABS is able to build its knowledge over time, as the Census is conducted every five years.

3.10 The ABS and Centrelink both use focus group and pilot testing of new versions of forms, sometimes with large numbers of potential users. The users come from both urban and rural regions and from a wide range of backgrounds. One form of pilot testing undertaken by the ABS is major field tests of the proposed Census form for each Census. For the development of the 2006 Household Census form, this has involved four preliminary tests involving up to 20 000 households and one large field test involving a total of 40 000 households. As part of form testing, the ABS analyses question completion, to support statistical manipulation of the Census data.

3.11 Centrelink has been active, since its establishment in 1997, in seeking information specifically relevant to the role of forms in the agencies' communication with its customers. It conducts regular research activities including direct feedback from customers, customer satisfaction surveys³⁸ and focus groups (Value Creation Workshops³⁹), involving customers and Centrelink staff who provide services to customers.

3.12 Centrelink advised the ANAO in October 2005 that:

Centrelink endeavours to undertake useability testing prior to the release of any new product and many of those products which undergo substantial changes. Centrelink is committed to an ongoing approach to improving the contact it has with customers, in particular to the contacts that involve obtaining information from our customers, as simply and completely as possible.

³⁸ In 2003, Centrelink commissioned specific research into its customers' preferences for when they interact with the agency. This research identified that around 61 per cent of Centrelink customers rated their overall satisfaction with Centrelink forms as 'good' or 'very good'. However, this research concluded that forms did not have a significant impact on satisfaction with the overall quality of Centrelink's people, services and information. The research was: DBM Consulting, *Centrelink Customer Interaction Study, customers' and non-customers' propensity to use alternative service delivery channels*, July 2003, pp. 43, 53, 89–91.

³⁹ The pre-eminent purpose of Centrelink's Value Creation programme is to improve the customer focus of the organisation. However, ANAO Audit Report No.36 2004–05, *Centrelink's Value Creation Program*, identified a possible bias in the results of the Value Creation programme. Stakeholders interviewed by the audit team raised the possibility that some customers might not speak openly at the focus group sessions because of a fear of retribution from Centrelink, particularly given that Centrelink personnel are present at the focus group discussion.

3.13 The CSA uses telephone-based interview processes to support tailored written communications with clients and to assist clients to understand forms they are required to complete.

3.14 Medicare Australia and, to a lesser extent, the CSA, have scant information of the literacy or other constraints experienced by those completing their paper forms, although daily client contact provides Customer Service Officers with some insights into their clients' literacy standards. The CSA uses several client feedback mechanisms⁴⁰ that indirectly provide information about client constraints and preferences in communication. Medicare Australia simply relies on feedback from Customer Service Officers' perceptions of client needs and preferences.

3.15 Analysis of form completion behaviour is an objective research tool that can be used for ascertaining unmet client communication needs. Errors or misinterpretations by respondents tend to fall into several categories, as follows: a question or section of the form is missed or not completed; additional, unsolicited information is provided; the information provided is incorrect; questions are misinterpreted; and data are incorrectly transcribed from another source.⁴¹

3.16 The ABS reviews how trial Census forms are completed by focus groups and uses this information in the further development of the Census form.

3.17 For some of its forms, Centrelink undertakes systematic analysis of form completion, including trends in errors. However, it has done so in the context of major reviews of programmes, rather than as a routine element of form design/redesign.

3.18 The ANAO considers that there would be benefit in:

- Centrelink, and other agencies, including analysis of form completion patterns in the review of all major forms;
- CSA and Medicare Australia including more analysis of clients' communications needs and preferences in their design processes for major

⁴⁰ Feedback mechanisms used by the CSA include: 'Customer has a say' feedback via a telephone keypad on completion of telephone-based interactions with CSA; client research mailbox which records issues identified in the course of Client Service Officers' work; formal complaints to the Commonwealth Ombudsman and the Minister; and opportunities for improvement identified by clients and staff.

⁴¹ Snooks and Co, op. cit., p. 362.

forms. Such consideration would address some of the useability issues with agencies' forms identified in Chapter 2.

Community consultation on form design

3.19 Of the audited agencies, only the ABS routinely consults with community organisations as part of its form design process. The ABS consults extensively with community organisations on matters relevant to the development of proposed Census questions. None of the other agencies covered by the audit consults community groups specifically on form design matters.

3.20 Stakeholder community organisations, to which the ANAO spoke during this audit (see paragraph 1.17), identified a number of possible improvements to form design, including those summarised in paragraph 2.15 and Figures 2.14 and 2.19.

3.21 The stakeholder groups also offered some observations about how agencies can improve the technology supporting forms and the quality of agencies' interactions with customers on forms.

3.22 The ANAO notes that there is a strong commonality between the suggestions made by the community groups and the good practice indicators identified by academic and focus group processes for this audit. This is not unexpected. One of the reasons for suggesting that agencies consult with relevant community groups, as part of their form design processes, is that these groups offer valuable insights into communications needs of the people they represent.

3.23 All of the agencies consult with various relevant stakeholder groups on a range of policy and program issues, some of which may be pertinent to form design. The ANAO considers that the insights such groups have to offer on forms provide a useful and low cost avenue that agencies, such as the CSA and Medicare Australia could explore further.

3.24 In summary, the ANAO suggests that agencies consider adopting the following practices to understand, and incorporate, clients' requirements for form design:

- obtain direct feedback from clients via customer satisfaction surveys, focus groups, and pilot studies;
- gather relevant information in the course of daily business;

- consult community groups to identify preferences for form design;
- collect client information from more than one source, and carefully consider the results of research; and
- study broad demographic profiles of clients and analyse question completion patterns.

Channels for clients to receive and complete forms

3.25 As discussed in Chapter 2, there are four main ways that Australian Government agencies can administer forms—personal interview, paper forms, online forms and via the telephone. Agencies are expected to provide flexibility and choice in integrated service delivery across these four communication channels.

3.26 Form design and review processes also need to reflect and give effect to broad business strategies, such as the Australian Government’s commitment to the electronic delivery of government business. Milestones in the Government’s commitment to online service delivery, relevant to forms, include commitments at Prime Ministerial⁴² and Ministerial⁴³ levels since 1997. Online service obligations, which form part of the *GovernmentOnline* strategy⁴⁴, and which include a commitment that: ‘All forms for public use must be available online, to be downloaded and/or electronically completed, by 1 December 2000’.

3.27 An Australian Government Access and Distribution Strategy was under development at the time of the audit, at the request of the Australian Government’s Information Management Strategy Committee (which reports to its Management Advisory Committee). This strategy will provide guidance to

⁴² *Investing for growth: The Howard government’s plan for Australian industry* 1997 [Internet]. <<http://www1.industry.gov.au/archive/growth/assets/multimedia/statmnt.pdf>> [accessed 22 September 2005]. This committed the Australian Government to deliver all appropriate Government services online by 2001.

⁴³ The continuing commitment of the Australian Government to creating better services through better use of information and communications technologies (ICT), was set out in an August 2005 speech by the Special Minister of State Senator the Hon E Abetz, *Creating better services for all Australians*, keynote address to Government technology E-Evolution Australia, *Enabling seamless and efficient service delivery with evolving ICT*, 29 and 30 August 2005 [Internet]. <http://www.agimo.gov.au/media/speeches/2005/better_services>.

⁴⁴ *GovernmentOnline*, the Government’s strategy, April 2000, included specific commitments to deliver all appropriate Commonwealth services electronically on the Internet by 2001, complementing, not replacing, existing written, telephone, fax and counter services. Australian Government Information Management Office, *GovernmentOnline: The Commonwealth government’s strategy* [Internet]. <<http://www.agimo.gov.au/publications/2000/04/govonline>> [accessed 22 September 2005].

agencies on how, and through which means, services will be delivered to customers.

Appropriate communications channels are offered

3.28 The ANAO considers that Australian Government agencies have clear guidance as to the necessity to deliver client services, including forms, in ways that accord with the communication preferences of their client groups.

3.29 Figure 3.4 summarises the ANAO assessment of the selected agencies' processes to disseminate and receive forms in ways that are appropriate to the contemporary communications environment.

Figure 3.4

Agencies' processes to disseminate and receive forms

Indicator of sound practice	ABS	Centrelink	CSA	Medicare Australia
Appropriate communications channels (modes) are offered	■	■	■	■
Online forms are 'discoverable' (able to be found easily)	*	□	■	■

Legend: ■ Substantially met ■ Met for some forms only □ Partially met □ Largely not met * not tested

Source: ANAO assessment.

3.30 The audited agencies have all considered, to varying degrees, the issue of providing an appropriate range of channels for members of the public to communicate with them.

3.31 In relation to the Census, the key development has been in regard to providing households with the opportunity to complete and lodge an electronic Census form. Using the results of the extensive field-testing it has conducted of the 2006 Census form, the ABS has estimated public demand for an electronic Census form for the next Census at 10 per cent of households.

3.32 Centrelink has commissioned a range of relevant customer research including into how likely particular customer groups are to adopt various alternative service channels, such as the Internet.⁴⁵ Centrelink's research found that recipients of Youth Allowance, Family/Children, and Austudy payments were the most likely to have access to the Internet. Acting on the results of this research, Centrelink has moved to provide recipients of Newstart Allowance

⁴⁵ DBM Consulting, Centrelink customer interaction study, customers and non customers propensity to use alternative service delivery channels, July 2003. See also Centrelink, Annual Report 2003–04, p. 124.

and Youth Allowance with a choice of channels through which to report each fortnight on their job search activities and earnings from employment. In addition to the traditional paper form, these customers can now report these things either via the telephone (using Interactive Voice Response technology⁴⁶) or over the Internet using online reporting.⁴⁷

3.33 The CSA uses, predominantly, a telephone-based application process for customers to access the agencies' services, rather than a paper form. However, it does offer form completion through personal interview at its sites and Regional Service Centres around Australia as well as online forms and paper forms. In the 1990s, the CSA undertook client consultation to inform its business process reengineering, including the introduction of the telephone-based application process. Customer-service advantages of telephone-based application include accurate input of information by a Customer Service Officer and immediacy of the application, which reduces time-lag in consideration of applications. As well, telephone-based application involves a conversation between a Customer Service Officer and the applicant, which supports the development of a positive relationship between the agency and the client.⁴⁸

3.34 Applications for Medicare registration involve completion of a paper form, with applicants advised that the form (and supporting documentation proving eligibility for enrolment and substantiating residency⁴⁹) is to be submitted personally.⁵⁰ Medicare Australia has looked to implement more

⁴⁶ Since September 2003, the use of Centrelink's Interactive Voice Response facility has steadily increased from 16 000 customer reports per fortnight to around 138 000 fortnightly customer reports in 2004–2005. See Centrelink, *Annual Report 2003–04*, p. 145 and advice from Centrelink to ANAO in September 2005.

⁴⁷ However, customers reporting online are still sent a paper form, which Centrelink suggests should be used to record the reported details for the customer's own records. If, for any reason, the online report is not successful, the customer can lodge the paper form in the usual manner. Centrelink advised the ANAO in October 2005 that its need to maintain availability in a variety of formats and throughout a substantial network of access points provides added pressures and challenges, particularly in respect of alternative formats.

⁴⁸ Nonetheless, one community organisation representing sole parents, to which the ANAO spoke, advised that some CSA clients perceive the telephone application process as less impartial than client completion of a stand-alone form.

⁴⁹ Eligibility documents are an Australian passport, birth certificate or birth extract, Australian armed services papers, and, for applicants born overseas, an Australian or overseas passport or travel document issued by the Department of Foreign Affairs and Trade, with a valid visa. Residency documents include a photographic driver's licence, rates notices with electricity, gas or telephone accounts in the same name, financial institution cards where a signature is included, firearm licence, motor vehicle registration papers and rental or employment contracts.

⁵⁰ The enrolment application form notifies that, if there are 'genuine reasons for not being able to attend', an application may be posted, together with original or certified copies of documents and a statement of reasons for not being able to attend. Hospitals may assist form completion and lodge an enrolment of an infant by mail.

choice for customers in communication channels. For example, the agency has implemented:

- post-enrolment services, available to individuals through telephony, such as change of address; re-issue of lost, stolen, damaged or expired Medicare cards; and change of cardholder details; and
- a national telephone service, and dedicated telephone booths in pharmacies, for the submission of Medicare claims. Medicare Australia also surveys customer satisfaction with the channels they have used.⁵¹

3.35 In addition to their own efforts in researching customer preferences in communication, Australian Government agencies are also supported by research into channel preferences for information delivery. The AGIMO has managed market research into electronic service delivery⁵². Centrelink's online services for young unemployed people and students are appropriately targeted to likely users of electronic service delivery.

3.36 On the other hand, the CSA's use of telephone-based services to administer the Child Support Scheme is likely to be better suited to those of its clients who are female custodial parents of young children than to its young employed male clients, who typically prefer online service delivery.⁵³ Online services may be suited to the lifestyle of some clients, some of whom provided evidence to the Australian Government's 2003 Inquiry into *Child Custody Arrangements in the Event of Family Separation* about some of the disadvantages of telephone contact with the CSA.⁵⁴

3.37 The CSA advised the ANAO in October 2005 that, although using predominantly telephone-based service delivery, its commitment to delivery of services online is demonstrated through two pilot online facilities:

⁵¹ In 2003–04, Medicare Australia's predecessor, the HIC commenced surveying customer satisfaction with the channel used. Health Insurance Commission, *Annual Report 2003–04*, p. 42.

⁵² Australian Government Information Management Office, *Australians' use of and satisfaction with e-government services*, AGIMO, Canberra, 2005. The report includes profiles of e-government users, and barriers and incentives to use of e-government. It found that channel choices for Australian government services as a whole were: personal contact (46 per cent of contacts) telephone (28 per cent), Internet (19 per cent) and mail (13 per cent).

⁵³ *ibid.*, p. 41.

⁵⁴ House of Representatives Standing Committee on Family and Community Affairs, *Every Picture Tells a Story: Report of the Inquiry into Child Custody Arrangements in the Event of Family Separation* [Internet]. Parliament of the Commonwealth of Australia, Canberra, 2003, p. 150, available from <<http://www.aph.gov.au/house/committee/fca/childcustody/report/fullreport.pdf>> [accessed 22 September 2005]. It included clients' recollected telephone contact with the CSA. One individual told the inquiry: 'You have to set aside an hour to ring Child Support'.

- for employers to submit information online about the amount of child support payments deducted from employees' salaries; and
- for individuals paying child support to view their child support statement online.

3.38 The ANAO suggests that the CSA consider expanding its online forms for individuals seeking, making and varying child support payments, so as to more fully accommodate the communications preferences of its clients.

3.39 The ANAO found that the audited agencies' have considered alternative form delivery channels, and these channels are broadly appropriate to the client groups using the services. However:

- three of the forms examined in this audit⁵⁵ were necessarily paper forms so as to comply with legislative requirements or policy and so were not fully accessible to users with particular print or dexterity needs. This suggests the need for an approach to accommodate their requirements better;
- the CSA could consider expanding its online form submission facility (available to applications for child support assessment at the time of the audit), to further accommodate the communications preferences of clients who are more comfortable using electronic rather than personal, telephone-based communications channels; and
- accessibility constraints identified in this audit indicate a need for more effective consideration by all agencies of accessibility and discoverability requirements in form design, review and dissemination.

3.40 Centrelink advised the ANAO in October 2005 that it will take the findings of the audit regarding the accessibility of its forms into account in its ongoing work to cost-effectively improve its services to its customers.

3.41 As guidance to all Australian Government agencies to understand, and incorporate, clients' requirements for form delivery channels, the ANAO suggests that agencies:

- research preferred communications methods, using direct feedback from clients and using information collected in the course of normal business;

⁵⁵ Form 9, *Child Support special circumstances application*; Form 10, *Child Support special circumstances response*; and Form 11, *Medicare enrolment application*.

- issue and receive all major forms in a paper form, electronically, and with telephone assistance; and
- regularly test the links to electronic forms.

Forms online are discoverable and useable

3.42 As outlined earlier, the Australian Government Strategy to deliver all appropriate Government services online states that: 'All forms for public use must be available online, to be downloaded and/or electronically completed, by 1 December 2000'. AGIMO advised the ANAO in January 2005 that:

- AGIMO had policy responsibility for online service obligations and their ongoing development; and
- online service obligations were being reviewed for relevance to the contemporary online service delivery environment.

3.43 The AGIMO website published the online service obligation pertaining to forms as:

There is a limited range of circumstances where it may be inappropriate for a form to be completed online or provided as a download. If it is not possible to provide online access then information on alternative ways of obtaining and completing the form must be provided. Agencies are also encouraged to regularly review their forms and application processes, so that online completion can be introduced as soon as it is feasible and appropriate to do so.

3.44 ANAO's review of the websites of the audited agencies in mid-2005 indicated that all of the agencies had made good progress toward placing forms online:

- the Australian Bureau of Statistics tested a limited version of an electronic Census in the 2001 Census;
- when the ANAO tested form availability on the audited Human Services agencies' websites, all but one of the forms covered by this audit was available on the relevant agency website;⁵⁶ and
- one of the audited forms (Form 7, *Child Support assessment application*) was available to be completed and submitted online.

⁵⁶ Centrelink had omitted Form 2, *Farm Help claim*, from its website until the matter was raised with the agency by the ANAO, in April 2005. Centrelink published the form online when made aware of the omission.

3.45 Many of the agencies' forms were in static PDF format. Although compliant with the online service obligation, this format has some limitations in accessibility to people with vision or dexterity impairment (see paragraph 3.70). AGIMO advised the ANAO in January 2005 that an online form or transaction can be just one element of a business or service delivery process, and of the overall customer experience. The customer experience can span a number of modes of delivery. AGIMO emphasised that the report, *Australians' Use of and Satisfaction with E-government Services*, makes it clear that the online mode of delivery might not be the most appropriate mechanism for all citizens' interactions with government.

3.46 Centrelink advised the ANAO that, as a general principle, it is not appropriate for all of its forms for individual completion to be placed on the Internet as some are generated by business rules and profiling of risks associated with the programme they support. Therefore, not every individual will need to complete all categories of forms in every situation. Such forms include electronically-generated personalised forms to accompany review processes and others to pre-populate forms with customer data as part of the customer account start-up processes.

Website navigation to forms

3.47 Recent research undertaken by AGIMO identified that some nine per cent of those who use the Internet (at home, the school library or at work), consider that more navigable website layout or navigation support would motivate them to use online services more.⁵⁷

3.48 In this audit, the ANAO found that there was a quick link to the agency's forms in the first level of the websites of the three service delivery agencies.⁵⁸ However, anomalies in the operation of the quick links resulted in inconsistent discovery depending on the links followed. For example, the ANAO noted a number of instances where particular Centrelink forms, although made available online, were not included in the 'Choose a Form' quick link drop down menu.⁵⁹

⁵⁷ AGIMO, op. cit, p. 49.

⁵⁸ The online Census form is only made available at the time of the Census to authorised users, which is appropriate.

⁵⁹ Some 62 forms were located through this link as at 22 April 2005. Centrelink had advised the ANAO that, at the time, some 174 Centrelink forms in total were available through its website; and that, in some cases, the link connected to suites of forms. Centrelink advised the ANAO in October 2005 that others of the remaining forms were under review at the time the first forms were placed online.

3.49 Australian Government agencies are obliged under the *Disability Discrimination Act 1992*⁶⁰ to ensure that online information and services are accessible by people with disabilities. The Government Online strategy requires agencies to fulfill their obligations under the Act by observing the World Wide Web Consortium's (W3C's) *Web Content Accessibility Guidelines 1.0*, to ensure the widest possible audience for *GovernmentOnline*. The Strategy required that, by 1 December 2000, all websites were to follow the W3C guidelines to a sufficient extent that they pass recognised tests of accessibility.

3.50 However, the ANAO's testing identified that, generally, the paths to all of the tested online forms did not comply with W3C guidelines to enable access by users with special print or dexterity needs. For example:

- Centrelink's online forms could not be accessed using screen readers⁶¹ because of tabbing or titling deficiencies;
- the navigation path to the forms on the CSA website could only be accessed using a mouse, which is not useable by some people with vision or dexterity impairment;⁶² and
- the entry pages to Medicare Australia's website have significant accessibility constraints (images without alternative text, text which cannot be re-sized and inaccessible navigation). The font on the Medicare Enrolment form is small. The document is not structured in a way that enables use by screen readers.

eCensus accessibility

3.51 A limited version of an eCensus form was developed in-house by the ABS and made available to a small number of individuals for the 2001 Census.⁶³ However, difficulties experienced by one user led to action against the ABS. The ensuing conciliation, under the auspices of the Human Rights and Equal Opportunity Commission, committed the ABS to consultation with user groups as well as the affected individual for future development of the eCensus.

⁶⁰ The *Disability Discrimination Act 1992* requires, among other things, that the administration of Commonwealth laws and programmes not discriminate against people with disabilities in the provision of goods, services and facilities.

⁶¹ Screen reader/voice output software converts text from the computer screen into synthesised speech output. The user can listen to what is presented on their computer screen.

⁶² The ANAO's consultants on accessibility suggest that, for every mouse click operation required to be performed by users, there should be a keyboard equivalent and every non-text item (for example, picture/diagram/icon) should have an appropriately informative equivalent text description, capable of being read by a screen reader.

⁶³ In March 2005, the ABS advised the ANAO that 17 people used the eCensus facility it provided for limited trial in the 2001 Census.

3.52 At the time of the audit, the ABS was developing and testing an eCensus form for the 2006 Census. The ABS advised the ANAO that people with disabilities were involved in the testing process; and that the form would meet the World Wide Web Consortium (W3C) Guidelines for Accessibility Compliance Level AA.

3.53 The ABS also advised the ANAO that the accessibility of its Census products was supported by the role of Census Collectors. Collectors may be able to assist people who have difficulty understanding the Census material, whether because of age, lack of facility in the English language or a physical impairment. However, the ANAO noted that this mitigating strategy cannot replace sound form design. Moreover, for the mitigating strategy of individual help by Collectors to be effective, the time and training costs could be substantial.

Summary of agencies provision of online forms

3.54 The ANAO considers that the audited agencies need to improve the accessibility of their forms to a range of users and suggests that they consider accessibility issues in the early stages of form design so that forms in accessible formats are available for completion and lodgement online by a range of clients, including those with special visual, dexterity or literacy needs. Detailed principles for improved accessibility of forms are at Appendix 2.

3.55 The CSA advised the ANAO in October 2005 that it would ensure that an updated website due for release in late 2005 would address accessibility and useability issues identified in this audit, including compliance with World Wide Web Consortium (W3C) Guidelines for accessibility and useability by users with special print or dexterity needs.

Effective management of form design and review

3.56 Form design represents a significant investment. If the processes to design and review forms are well managed, forms will be effectively designed, which will support efficient and effective programme administration.

3.57 Each of the audited agencies has form design processes, using either in-house or outsourced expertise; although, on available evidence, the approaches followed by Medicare Australia are less structured than those in the other audited agencies. Figure 3.5 summarises the approaches to form design used by each of the audited agencies.

Figure 3.5**ANAO assessment of agencies' processes for form design and review**

Indicator of sound management and process	ABS	Centrelink	CSA	Medicare Australia
Systematic form design, testing and review processes				
Protocol /guideline setting out roles and responsibilities in form development	■	■	■	□
Forms Officer is responsible as the gatekeeper and coordinator of forms design and review processes	■	■	■	□
Consultation between content owners and design experts	■	■	□	■ ^a
Systematic processes gather information from across the agency relevant to design and review	■	■	□	□ ^a
Expertise in design is used in early stages of form development	■	■ ^b	□	□
Forms review programme reflects the significance of the forms and/or the programmes they serve	■	■	■	□
Expenditure on form design and review is monitored and assessed				
Costs of design, development and review processes are identified	■	■	* ^c	■ ^d
Impacts of form design are monitored	■	□	□	■

Legend: ■ Substantially met ■ Met for some forms only □ Partially met □ Largely not met * no rating

Notes: (a) Medicare Australia engaged design expertise in amending the Medicare enrolment application form in late 2002. It consulted health service practitioners about the concept of the Medicare Smartcard but not design experts about the design of the form. In developing its Voluntary Indigenous Identifier, Medicare Australia consulted with agencies in other portfolios.

(b) Centrelink advised the ANAO that it uses in-house conceptual design expertise in the early stages of form review. The involvement of external, physical design expertise comes later.

(c) The CSA advised the ANAO in October 2005 that it does not separately identify form design and review expenditure. It has not expended money on those items since 1999. Nonetheless, it considers its use of a spreadsheet to track the expenditure of its communications budget illustrates its capacity, expertise and processes to manage form design and review.

(d) Medicare Australia used a project-based budget for developing its Smartcard. Form design is not separately identified from printing. The last redesign of its Medicare enrolment form was funded as part of introducing a Voluntary Indigenous Identifier.

Source: ANAO assessment.

3.58 While the ABS and Centrelink have generally demonstrated all or most of the elements of sound practice in form design and review, the processes in use in the CSA demonstrate around half of these elements, while those in evidence in Medicare Australia omit many of these elements.

3.59 A useful strategy adopted by Centrelink is expert review of patterns of form completion errors as a foundation for form re-design, in cases where unusually high error rates in client completion are identified. Centrelink advised the ANAO in October 2005 that its forms team includes a senior forms publishing officer. That officer has forms design qualifications, and is responsible for form quality issues, including completion patterns.

3.60 Medicare Australia has developed its Smartcard concept with the benefit of views of health professionals and focus group testing of the concept of a Smartcard, although this has not extended to design of the application form for the Smartcard. Medicare Australia also advised the ANAO that it tested the Aboriginal and Torres Strait Islander Medicare Enrolment form with consumers and health service workers. Medicare Australia advised the ANAO that its design and development of the Smartcard form was based on the existing Medicare Enrolment form, with minor modifications and inclusions in the existing form. Expenditure on the design and development of the Smartcard was not identified.

Systematic form design, testing and review

3.61 Effective use of a form as a business tool necessitates the development, testing and review of the form's design in an orderly way. Re-testing to confirm the continuing effectiveness of design approaches should also be undertaken periodically.

3.62 Three of the audited agencies (the ABS, Centrelink and the CSA) operate a protocol for forms development. These protocols set out respective responsibilities of the various parts of the organisation in relation to form development. In those agencies, standards in design and layout are also stipulated. Centrelink's protocol also outlines the financial operating environment associated with the relevant activities.

3.63 All the audited agencies publish corporate standards for form design and layout, although CSA's design standards are local to the CSA and are based on design standards of one of its organisations within which it previously operated (the Australian Taxation Office).

3.64 Forms design and review checklists are used in the ABS and the CSA and one was in the early stages of development in Centrelink at the time of the audit fieldwork.

3.65 Centrelink advised the ANAO that, in May 2005, Centrelink's forms production and management practices were certified as compliant with the Australian and New Zealand Standard ISO9001 2000 Quality Assurance Management System Requirements covering specification, production, warehousing and distribution processes.

3.66 The ABS, Centrelink and the CSA have a designated Forms Officer responsible for coordination of form design, development, procurement and review. The audit identified that these agencies benefit from process coordination.

3.67 The ANAO considers that the designation of a Forms Officer in Medicare Australia could facilitate consistent approaches across the agency in form design and review, ensure quality assurance processes are followed, and monitor cross-portfolio issues relevant to form design—for example, accessibility of design and protection of clients' privacy.

Corporate sign-off of form content

3.68 A form is a primary vehicle for communication between an agency and its clients and is likely to provide information that entails financial or policy undertakings on behalf of the agency. It is sound practice, therefore, for relevant managers to 'sign off' the content of forms, as quality assurance and risk management measures. All audited agencies had appropriate sign-off requirements in place. It is usual for the Forms Officer to be responsible for managing consultation processes to secure this sign-off.

Version control

3.69 A form should be the same in content, no matter which channel a customer uses to access the form. Inconsistencies in provisions of a form accessed through different channels could lead to embarrassment of an agency, administrative errors and, potentially, legal implications.

3.70 Placement of forms online in a static PDF format precludes different content between the paper and online versions, provided version integrity processes are effective. However, placement of forms online in PDF format raises some issues regarding accessibility of the form to some users who may have special print or dexterity needs.⁶⁴

3.71 The CSA offers the *Child Support assessment application* form on its website in interactive format for online completion and submission. Other CSA forms on the website are in static PDF format. The Forms Officer is responsible for ensuring that the current versions of forms are placed online by CSA's website manager.

3.72 Centrelink's and Medicare Australia's processes aim to keep their online and paper versions of forms substantively consistent; and no inconsistencies were identified in the course of the audit.

3.73 It is good practice for documents with different content to be assigned different identifiers. This is a fundamental element of form integrity. Version control processes used by the audited agencies included numbered versions of forms, incorporating a version release date in the number. It is important that the core provisions in forms across the delivery channels are consistent.

3.74 During the course of the audit, the ANAO identified an anomaly in version control in one of the CSA's forms. In the case of Form 9, the *Child Support special circumstances application*, the ANAO identified significant differences between the paper and electronic versions of the forms (both available to clients at the time of the audit), even though they each carry the same identifying number. The electronic form and linked explanatory material contains additional wording that is not reproduced in the paper form. Some of the differences are significant, in that they relate to agency undertakings about disclosure of client information. Some significant differences between the paper and electronic versions are shown in Figure 3.6.⁶⁵

⁶⁴ AGIMO advised the ANAO in November 2005 of the following:

An agency providing a PDF version of a form meets the requirements in that online access to the form is provided, but it should be noted that it may run into difficulties from an accessibility perspective. See section 2.3 of the HREOC Guidelines World Wide Web Access: Disability Discrimination Act (DDA) Advisory Notes http://www.hreoc.gov.au/disability_rights/standards/www_3/www_3.html , which say: 'The Commission's view is that organisations who distribute content only in PDF format, and who do not also make this content available in another format such as RTF, HTML, or plain text, are liable for complaints under the DDA.'

⁶⁵ Among other differences, the paper form includes a flow diagram headed 'Changing your child support assessment: the process when you are applying' which is not reproduced in the electronic form.

Figure 3.6**Additional material in the online version of Form 9, *Child Support special circumstances application***

Section	Material
	Words in the electronic version but not in the paper version
Translation	<i>Information for parents who speak other languages. The Translating and Interpreting Service is a free service for clients who need interpreting help.</i>
Privacy statement in 'Change of Assessment' guidance section	<i>It is an important part of CSA's charter that we respect the privacy of parents, keep information confidential and are sensitive to parents' needs. During the course of an application for a change of assessment, we need to pass on some information so that both parents are involved in this important decision. However, this is limited to what is contained in the application form or response form, supporting documentation accompanying those forms and any other information provided that will be taken into account in making the decision.</i>
	Words in the paper version but not in the electronic version
Privacy statement at end of electronic form and in preface to the paper form	<i>The CSA reference or file number requested may in some cases also be your Tax File Number. It is not an offence if you choose not to quote your Tax File Number. The information you submit to CSA will only be used for the purpose for which you provided it.</i>

Note: Paper version of Form 9, CSA 1970-6.2004 advises: 'the other parent will receive a copy of the information you provide in the form and supporting documents (except for the Privacy Section). This is done so both parents know the information CSA will take into account and can comment on it. This is required by law'.⁶⁶

Source: ANAO review of paper form CSA 1970-6.2004 and online forms CSA 1970-6.2004 and CSA 1970-6.2005 (downloaded 31 May 2005 and 21 September 2005 respectively).

3.75 Such substantive differences in the paper and online versions of the form (related to the process for handling client data) indicate inadequate version control processes.

3.76 The CSA advised the ANAO in October 2005:

The process currently employed for updating HTML versions of the forms is once a form has been approved it is sent through to the web team to load the PDF version. The web team then use the PDF as a reference to make any changes required to the HTML version. CSA recognises that there is room for human error in this process.

⁶⁶ Source: CSA 1970-6.2004 paper version, Reason 10, *Things you and your partner should consider*, p. 26 of the form.

CSA will strengthen the quality control to help minimise the risk of human error in this process. Currently the Publications Manager has a process when closing jobs off where they check that the correct version has been loaded on the Internet and intranet. A further process will be added where the content of the HTML will also be checked before a job is closed off.

3.77 The ANAO suggests that all agencies, if not already doing so, test periodically that their version control processes are appropriate to the range of communication channels used to deliver forms and associated material to their clients.

Across agency perspectives and external expertise

3.78 There is benefit in an agency's form design team bringing together operational and policy perspectives from across the agency, as well as external expertise. For example, in business process and form design, communication between those staff responsible for policy development; those who design and deliver a programme; and those who have communications and/or form design expertise can identify problems and opportunities for change before a design is set.

3.79 The ABS and Centrelink have processes that bring together expertise and perspectives from across the agency and outside expertise in form development and design. Centrelink has used external expertise in its reviews of form design in the context of major programme evaluations. The ABS uses its in-house expertise of various disciplines to identify opportunities for improvement of the *Census Household Form 4*.

3.80 The form design protocols in CSA and Medicare Australia make individual form content managers responsible for developing the content of the form. In the CSA, the agency's legal unit clears form content; subsequently, the form manager liaises with the form publisher. Medicare Australia used external design expertise for review of the Medicare enrolment form. Medicare Australia has not used teams from across its agency in the development of the forms tested in the audit, although it consulted agencies in other portfolios in redesigning the Medicare enrolment form to include a Voluntary Indigenous Identifier question. Medicare Australia advised the ANAO in October 2005 that it had collaborated with Centrelink to design a form evidencing birth for both Medicare enrolment and Family Assistance purposes. Medicare Australia advised the ANAO that the form would be market-tested.

3.81 Medicare Australia also advised the ANAO in October 2005 that it is working towards aligning its policy and procedures related to evidence of identity with those of other Human Services agencies. This will entail design of cross-agency forms and the use of alternative data collection channels.

3.82 The ANAO suggests that agencies would benefit from reviewing whether their form design and review practices adequately take into account the operational and policy perspectives from across their agencies, as well as external expertise.

Review processes

3.83 Good practice published by the UK's National Audit Office identifies the need for at least two types of review of form objectives:

- regular or normal reviews that are open-ended, resulting in usually small-scale improvements; and
- re-engineering reviews with specific policy or operational objectives, which are likely to result in major changes.⁶⁷

3.84 Review of the form objective is an integral component of the Census development cycle in the ABS. The ABS is considering staggering topic coverage in the Census so that some topics would be addressed each decade instead of five-yearly, thus enabling more efficient question development and testing.

3.85 Centrelink's design processes are aligned to its programme development and review processes. Funding of minor form redesign is treated as a maintenance allocation. New forms and major reviews of existing forms are usually funded on a project-basis.

3.86 The CSA reviewed its form objectives in the course of business process reengineering of the delivery of child support, in the past decade. This review resulted in the adoption of telephone-based applications as the agency's preferred method of engaging with its customers.

3.87 However, under legislation, any application to change a child support assessment in special circumstances must be made in a specified written form (Form 9, the *Child Support special circumstances application*). The CSA has been aware since the late 1990s that the change of assessment forms used by the agency are intrusive in their questions and difficult for customers to

⁶⁷ UK NAO, *Improving and Reviewing Government Forms*, op. cit., p. 12.

complete.⁶⁸ As a mitigating strategy, CSA Customer Service Officers talk to clients about the process before either posting forms to them for completion or referring applicants to website versions of forms. At the time of the audit, the CSA was commencing a review of the processes to change child support assessment in special circumstances.

3.88 Medicare Australia has reviewed its Medicare Enrolment application form, most recently in early 2003 with inclusion of a Voluntary Indigenous Identifier and privacy note. The Medicare Smartcard application form was in its developmental phase at the time of the audit. Medicare Australia advised the ANAO that the form was being evaluated in the context of an evaluation of the roll-out of the Medicare Smartcard.

Review of question design

3.89 The Census reviews conducted by the ABS are large-scale and rigorous. They cover the design of questions and the useability of the data they generate as well as every aspect of the form distribution and collection process. Following each Census and major trial, an analysis of the form's content and structure is undertaken. Findings from that research are taken into account in the development of the next Census form. At the time of the audit, the ABS was progressively responding to its review of the 2001 Census processes.

3.90 However, the ABS does not currently investigate the reasons for non-completion of a Census form as a whole, although it does follow up some respondents to the trial Census. The ABS is only able to 'theorise' reasons for incomplete forms. Therefore, the ABS is not certain why some of its questions are not answered, which may include 'respondent fatigue' or resistance to intrusive personal questions. If the ABS had a fuller understanding of the motivations and disincentives affecting non-completion of the Census form, it would be better placed to design its forms for optimal length and layout. The ANAO suggests that the ABS investigate ways to follow-up attitudinal constraints to Census completion.

3.91 Centrelink uses a variety of research tools to test its forms and associated information booklets, including focus groups and useability tests.

⁶⁸ A business process review in the late 1990s foreshadowed revision of the forms for change of assessment in special circumstances. However, further review of the forms did not proceed. The CSA advised the ANAO that the review did not proceed as intended in 2001, because of other organisational priorities relating to the introduction of a new computer system, and a sense that the entire process needed to be revisited, not just the forms. A re-engineering project was subsequently approved for 2004–05. Planning for this project started during the audit.

3.92 The CSA uses several client feedback mechanisms that indirectly provide information about client constraints and preferences in communication. During the audit, the CSA reviewed this information for relevance to form design. The ANAO suggests that periodic review by the Forms Officer and use of this information in form redesign would strengthen CSA's form design processes.

3.93 Perhaps reflecting the CSA's emphasis on telephone communication as the predominant mode of communication with its clients, the overall style of the CSA client forms has remained unchanged since the CSA was part of the Australian Taxation Office.⁶⁹ The CSA advised the ANAO that it reviewed forms each time they were re-printed, resulting in subtle changes over time. Moreover, the forms related to the change of assessment in special circumstances were changed substantially in 1999, in response to market research. Nonetheless, the ANAO suggests that there is potential for significantly improved design and layout of child support forms if there were discussion between content owners and external experts in form design techniques early in the business process review/ form review process.

3.94 Medicare Australia generally places a heavy reliance on its own staff to identify any necessary improvements to forms, either through their own direct experience with processing forms or as a conduit for comments/feedback volunteered by customers. Form 11, *Medicare enrolment application*, had not been reviewed since its development in 2003. Medicare Australia's processes for form design and review could be strengthened by more proactively seeking the views of customers through market research and market testing of form design, as well as by analysing completion errors, where appropriate.

3.95 The ANAO suggests that Australian Government agencies adopt the good practice published by the UK's NAO (see footnote 11), and consider undertaking the two following types of reviews:

- regular or normal reviews that are open-ended, resulting in usually small-scale improvements; and
- re-engineering reviews with specific policy or operational objectives, which are likely to result in major changes.

⁶⁹ The CSA was part of the Australian Taxation Office until 1998. Between October 1998 and October 2004, the CSA was part of the Department of Family and Community Services. Since October 2004, the CSA has been part of the Department of Human Services.

Relationship between paper and electronic forms

3.96 In developing and testing the eCensus, the ABS has identified that differences in the ways users view an electronic form compared to the way they see and handle a paper form could affect data quality. With the paper form, a user sees a question in the context of adjoining questions and associated documentation. The dynamic nature of an electronic form restricts the number of visual cues assisting the respondent to answer questions. The ABS advised the ANAO that it is addressing these issues in developing an eCensus for the 2006 Census.

3.97 In January 2005, the ABS advised the ANAO that the ABS might consider a major process reengineering of the Census format in preparation for the 2011 Census. It expects electronic Census delivery to be fully developed by that date and the use of an eCensus facility is likely to be a popular choice.

3.98 The ANAO suggests that the ABS consider offering to other Australian Government agencies the design solutions it develops, to match the useability of the paper Census form and the eCensus.

Privacy considerations affecting form design

3.99 Research by AGIMO has identified impediments to the use of electronic service delivery.⁷⁰ Some eight per cent of people responding to the AGIMO study identified concerns about security of information among their reasons for not using electronic service delivery. Participants in the focus groups convened for this audit perceived potential, unauthorised disclosure of personal information to other government agencies as a problem.

3.100 Sound practice includes:

- placing the agency's confidentiality or privacy undertakings at the beginning⁷¹ of the form. It may be appropriate to reinforce the privacy and confidentiality undertakings by placing similar material at the end of the form; and
- keeping requests for personal or potentially intrusive information to the minimum required, and where such information is requested, the

⁷⁰ AGIMO, op. cit.

⁷¹ The ANAO's recent audits of Centrelink's Customer Charter, Customer Satisfaction Surveys, complaints handling and review and appeals system identified that vulnerable groups, such as illiterate or semi-literate customers, need accessible service commitments; more comprehensible information about customers' rights of appeal; and better understanding of privacy and confidentiality issues. See ANAO Audit Reports No. 32, 33, 34 and 35 of 2004–05.

reasons why it is required and the level of confidentiality that will be adhered to should be clearly stated.

3.101 The service delivery agencies' forms and/or associated information material examined in this audit included undertakings to protect the privacy of applicants. In many cases, the applicant was made aware of the potential for data sharing between government agencies named in the form/booklet or for information to be passed to legal and medical authorities. In some cases, forms included warnings of the potential for fraud investigation of applications.

3.102 Some of the reviewed forms have design features that exemplify sound practice in protecting the privacy of the people completing them. For example:

- the CSA paper forms for changing child support assessments use separate parts of the form for each parent and colour codes parts of the form that are passed to other parties. Some of its forms are marked 'client in confidence'; and
- the CSA's telephone-based interview approach to interaction with its clients enables data entry direct to its computer-based client records. This approach minimises the potential for disclosure of personal information to unauthorised people, provided that the customer's identity is reliably authenticated. At the time of the audit, the CSA was developing a secure customer registration system, replacing the use of tax file numbers as identifiers, because tax file numbers could be known to other parties.

3.103 In February 2005, Medicare Australia's predecessor, the HIC, advised the ANAO that online Medicare registration had been considered. However, it prefers that applicants attend personally at a Medicare Office to present their identity documents.

3.104 Centrelink's Newstart Allowance and Youth Allowance Information Booklets outline applicants' rights and avenues for privacy protection. Because of the bulk of the material, it is placed in the information booklet accompanying the form, rather than appearing in the forms themselves. Given the potential significance of privacy protection, the ANAO suggests that Centrelink consider including an abbreviated privacy statement on the application form, which could be cross-referenced to the full statement in the information booklet. Centrelink advised the ANAO in October 2005 that this suggestion would be addressed in Centrelink's review of the form.

3.105 The ANAO suggests that agencies review and, if necessary, strengthen their practices aimed at protecting the privacy of people completing their forms, including by:

- placing the agency's confidentially or privacy undertakings prominently on their forms;
- keeping requests for personal or potentially intrusive information to the minimum required; and
- where personal information is requested, explain why it is required and the level of confidentiality that will apply.

Expenditure on form design and review is actively managed

3.106 Effective form design is a business investment. Accordingly, it is important for agencies to actively manage that investment and monitor the impact of form design on business efficiency and/or effectiveness.

3.107 Processes supporting the active management of form design resources in the ABS and Centrelink are consistent with those agencies' recognition of the potential for effective communication with customers through well-designed forms, discussed earlier in this chapter.

3.108 Agencies' approaches to managing their expenditure on form design vary:

- the ABS is able to estimate the cost of form design and review, within the total cost of Census development and administration by its staff;⁷²
- Centrelink, using external contracts, monitors its form design and production costs (excluding in-house costs) as part of its contract management. Minor changes to existing forms and their reprint is usually funded from a maintenance allocation. Funding for new forms and major reviews of existing forms is usually project funded. Centrelink advised the ANAO that the design and printing of Centrelink forms cost \$5.5 million during 2004–05;
- the CSA's form design, production and warehousing costs are managed within its communications budget. The CSA advised the ANAO in October 2005 that the CSA has not conducted any formal external forms

⁷² The ABS advised the ANAO that, for the 2006 Census, personnel, information technology and other costs associated with the development and testing of household Census forms are estimated at \$4.6 million.

review since 1999–2000 so there has been no expenditure on forms design and review since then. The CSA advised the ANAO that, in 2004–05, form printing cost approximately \$76 000 (GST inclusive) and warehousing of the forms approximately \$18 000 (GST inclusive); and

- Medicare Australia’s form design and production costs are treated as part of relevant policy budgets, and are identifiable within those budgets. The design and printing of forms is generally performed by contractors, with in-house coordination of the form production process.

3.109 Only one of the agencies has processes for monitoring the impact of form design on programme effectiveness. Centrelink’s forms designer advised ANAO that Centrelink reviews trends in completion error in the context of major form reengineering projects.

3.110 The ABS and Centrelink resource the audited form design and review processes on a project basis, which is consistent with strategic use of form design resources.

3.111 The ANAO suggests that other agencies would benefit from monitoring expenditure on form design and the impacts of the design of its major forms on administrative efficiency. This information would enable agencies to manage resource allocation for form design and review as investments in achieving outcomes. It would also identify opportunities for improvement in form design to reduce the administrative effort required to deal with customer errors and/or omission in completing these forms.

Overall conclusions on agencies’ form design processes

3.112 The ABS and Centrelink manage robust processes aimed at assisting these agencies to understand and respond to clients’ communications needs and preferences. Nonetheless, there is scope for all agencies to strengthen some elements of those processes.

3.113 At the time of the audit, the agencies used various channels for the delivery and receipt of forms, ranging from paper to electronic and telephone-based. Channels for the delivery and receipt of forms were broadly appropriate to the services being delivered and the client groups using the services. However, three of the forms examined in this audit were necessarily paper forms so as to comply with current legislative or security requirements.

3.114 Two agencies (the ABS and Centrelink) that have invested in researching their customers’ communications needs and preferences and form

design and review processes, are also those that actively manage their budgets for form design and review.

3.115 Three of the agencies (the ABS, Centrelink and the CSA) had designated Forms Officers who were responsible for coordinating and managing all aspects of forms development and production, including design and review. Protocols/guidelines for forms development also operate in those three agencies.

3.116 Areas for possible strengthening in all of the audited agencies include: consultation with community groups about the communications preferences and needs of their members; and early involvement of design experts with content owners of forms to enable more effective and efficient form design approaches.

3.117 Areas for possible strengthening in some of the audited agencies include: research into clients' communications needs and preferences (the CSA and Medicare Australia); ensuring that forms placed online are easily found (Centrelink); and analysis of customers' form completion patterns to identify common areas of difficulty (the CSA and Medicare Australia).

3.118 The ANAO suggests that agencies, where not already doing so:

- consult with relevant community organisations about the communications needs and preferences of the client groups they represent and take account of this information in their form design and review activities;
- strengthen their understanding of client preferences and constraints influencing channel use (mode of communication); and facilitate clients' connection to the channel most appropriate to their circumstances;
- involve design experts with content owners of forms early in the design process to enable more effective and efficient form design approaches;
- test how easily forms placed on their websites may be found, including by users with special print handicap, literacy, language and dexterity needs;
- undertake independent market research on customer satisfaction with the agencies' major forms and associated information products; and
- undertake systematic and regular analysis of customers' completion patterns for the main forms used for delivering major programmes.

Recommendation No.1

3.119 The ANAO recommends that agencies test the useability of their forms prior to their release, taking account of the literacy skills and accessibility needs of their client groups.

Agencies' responses

ABS response

3.120 The ABS supports Recommendation No.1 of the report. The ABS is happy with the general findings of the report. In particular, we are pleased that the report acknowledges, in paragraph 1.14, that consideration needs to be given to the objectives of the forms being reviewed and their 'fitness for purpose', for example whether the forms are being produced for administrative purposes or for statistical purposes. The ABS is also pleased that the report has clearly indicated, in paragraph 3.52, the development and testing work that has been undertaken in developing an electronic Census form which meets the World Wide Web Consortium (W3C) Guidelines for Accessibility Compliance Level AA and that this electronic form will increase the accessibility of the Census form for people with disabilities.

Centrelink response

3.121 Centrelink welcomes the ANAO's acknowledgement of the complexities involved in effecting timely, cost-effective and efficient interactions between government agencies and individuals in the context of a rapidly changing technological environment. Centrelink agrees with the one recommendation arising from the report. Centrelink will discuss this report and its recommendation with purchasing departments in the context of Centrelink's already well established processes for on-going improvement to forms design, delivery, receipt and review.

CSA response

3.122 The CSA agrees with the ANAO's main recommendation and many of the further suggestions outlined in the report. Please note that the Parkinson report may be considered and acted on by Government over the coming months. The CSA will use every opportunity to implement these recommendations when redeveloping material to accommodate new Government policy. Thank you for the opportunity to comment on your

review and for helping CSA continuously improve our service delivery to our customers.

Medicare Australia

3.123 Medicare Australia welcomes the assurance provided by the ANAO that the forms issued were generally user-friendly and effective in collecting the desired information and that Medicare Australia provided broadly appropriate channels for the delivery and receipt of forms. Medicare Australia is reviewing letters and forms to make them easier for our customers to use and understand. The ANAO recommendation will be addressed during this process. Medicare Australia agrees with the ANAO recommendation.



Ian McPhee
Auditor-General

Canberra ACT
25 January 2006

Appendices

Appendix 1: Effective forms testing

Form design elements tested during the audit

Criteria	Issue	Remedy
Purpose	Does the form convey the purpose of the exercise?	State at the outset what the purpose of the exercise is, and how this relates to the circumstances of the person completing the form.
Introductory material	Is a 'quick start' of the form possible?	As much of the form as possible should be able to be completed without reference to guidance notes or explanatory material. Any confidentiality or privacy issues need to be stated at the beginning.
Incentives	Does the person have sufficient incentives to complete the form?	Show the increased rewards that will flow from the completion of the form; reduce the costs of completing the form; emphasise that completion is consistent with other activities that the individual may have undertaken; establish trust with the person completing the form.
Branching	Are numerous skips necessary to complete the form?	Reduce skips as much as possible, so people do not have to navigate between questions and sections not relevant to them.
Guidance and documentation	Is the form intelligible and capable of completion without reference to any supporting documentation?	The need to consult other information to fill the form in correctly should be minimised, and any materials provided with the form should be adequate for the task.
Length	Is the form short, concise and to the point?	Forms should be as short as possible, excluding material not central to the purpose.
Language	Is the language clear and free of jargon?	Questions should be short, unambiguous and tailored to the least literate, and to those whose first language may not be English.
Complexity	Does the form avoid technical complexity?	Forms should not assume that persons possess complex information.

Criteria	Issue	Remedy
Relevance	Is the form relevant to the person completing it?	Wherever possible, forms should use market segmentation and avoid the 'one size fits all' approach.
Reliability and validity	Do the questions result in consistent answers? Do the questions adequately cover what they are intended to cover?	Questions need to be pretested for their consistency, and for their ability to measure what is intended.
Coherence	Are the questions grouped logically, retaining the attention of the person completing the form?	Interesting questions should be placed at the beginning, to increase attentiveness and reduce error, and more intrusive or difficult questions later, as the person gains confidence in completing the form.
Layout	Is the physical layout of the form clear and well-organised?	Use clear, easy to read fonts. Use colours and icons to guide people to specific sections.
Electronic forms	Is the form easy to complete online?	Online forms need to be similar in format to their offline counterparts, and to allow quick, efficient completion.
Returning forms	Can forms be returned easily?	Facilitating the return of completed forms enhances compliance and reduces the cost to the person.
Pretesting	Has the form been tested on a representative group?	Use retrospective interviewing of the pretest respondents to find out how they went about completing specific questions.
Revising	Is the form periodically reviewed to ensure that it is working efficiently?	Use the estimation of error rates for particular questions or focus group research to evaluate form effectiveness and the need for revision.

Source: ANAO.

Focus groups' criteria

The focus groups tested the audited forms to:

- identify the features of the forms that affect the accessibility, useability, clarity and ease of completion of the forms under review; and
- generate some higher-level observations about the effectiveness of form design among the sample forms.

Appendix 2: Making forms accessible to users with disabilities

Formats

Print forms and associated information

These guidelines apply to all forms that are completed using a printed version. This includes forms that are downloaded from the web or email and then printed.

Sound practice:

- Form and associated information are available in correctly produced standard text;
- Form is available in correctly produced alternative formats (Braille, audio, large print, electronic text);
- Associated information is available in correctly produced alternative formats (Braille, audio, large print, electronic text); and
- To enable checking (immediately or at some later time), a copy of the completed form is available in correctly produced alternative formats (Braille, audio, large print, electronic text).

Electronic forms (including HTML/XHTML forms) and associated information

These guidelines apply to all forms that can be completed, in whole or part, using electronic input.

Sound practice:

Non-W3C Technologies

- Electronic form (not built with W3C technologies) is capable of being completed by people employing commonly used assistive technology; non-W3C technologies include Microsoft Word, Rich Text Format, Adobe PDF and structured e-text; and
- To be capable of being checking (immediately or at some later time), a copy of the completed form is available in correctly produced alternative formats (Braille, Audio, large print, electronic text) or in an electronic format that may be completely readable by people employing commonly used assistive technology.

W3C Technologies

- Web form to be built in valid HTML or XHTML and meets the W3C Web Content Accessibility Guidelines 1.0 (<http://www.w3.org/TR/WAI-WEBCONTENT/>);
- Users have the option to validate the completed form prior to submission; and
- To enable checking (immediately or at some later time), a copy of the completed form is available in valid HTML or XHTML that meets the W3C Web Content Accessibility Guidelines 1.0.

Telephone forms or forms completed electronically by government staff, and associated information

These guidelines apply to all forms that are completed via the telephone or by operators in face-to-face situations.

Sound practice:

- The form questions are tested to ensure that they do not presume anything about the abilities or disabilities of the responder;
- If completion of the form via the telephone requires reference to associated information, this associated information is available in accessible formats in advance; and
- To enable checking (immediately or at some later time), a copy of the completed form is available in correctly produced alternative formats (Braille, audio, large print, electronic text).

Access channels

It is a good idea for forms and associated information to be available through at least two channels (modes) of interaction.

Web Channel

These guidelines apply to forms and associated information that are accessed via a web page. It includes forms that are accessed electronically, but are completed manually.

Sound practice:

- Forms and associated information are accessible within a web page that conforms to W3C Web Content Accessibility Guidelines 1.0;

- The paths to the form and associated information, from commonly used entry points, are via pages that conform to W3C Web Content Accessibility Guidelines 1.0 (this includes the entry page and all intermediate pages);
- The availability of alternative channels of interaction is clearly and prominently displayed; and
- Error reporting and feedback is accessible and meaningful to people employing commonly used assistive technology and conforms to the W3C Web Content Accessibility Guidelines 1.0.

Email channel

These guidelines apply to forms attached to emails or where email is used to provide a link to the entry point, which enables access to a web page that enables access to the form and associated information.

Sound practice:

- The email is in a format that can be accessed by people employing commonly used assistive technology; and
- The pathway to the form via a link (login screens etc.) is accessible. Usually this means that the pathway conforms to the W3C Web Content Accessibility Guidelines 1.0.

Telephone channel

These guidelines apply to forms completed over the telephone, through either Interactive Voice Response systems or a personal operator.

Sound practice:

- If completion of the form via the telephone requires reference to associated information, the operator, or Interactive Voice Response (IVR) system, check that the associated information has been made available in the appropriate accessible formats;
- If the completion of the form via telephone requires use of an IVR system this process is tested for appropriateness for people with disabilities AND an option to complete the form with operator assistance is available. The choice to use an operator is provided in the first list of IVR options and it is the default if a person chooses not to use the IVR system or cannot use the IVR system;

- People with hearing or speech impairment can complete the form using a telephone relay service for people with impaired hearing; and
- If the information being provided is highly personal, the option of completion via a Telephone Type Writer (TTY) service ⁷³ is available.

Figure A2.1

Telephone relay service



Source: Vision Australia.

⁷³ This technology uses the telecommunications network to transmit text messages between telephone typewriters.

Figure A2.2

Telephone Type Writer



Source: Vision Australia

Face-to-face channel

These guidelines apply to forms that are completed in person at a government office or agency.

Sound practice:

- Accessible formats are available at the face-to-face channel site:
 - If the face-to-face channel is managed through appointments, then the form and associated information are ordered in the requested formats so as to be available at the appointment;
 - If the face-to-face channel is a walk-in service, then alternative formats are available on request. (Large print format can be downloaded and printed as needed, but Braille and audio versions need to be pre-produced and distributed to each face-to-face channel site); and
- Personnel at the face-to-face channel site provide skilled and appropriate assistance in completing the form, if required.

Unsolicited supply channel

These guidelines apply to forms that are included in any material that is mailed (via post or e-mail), or delivered, to people who have not specifically requested the information or form.

Sound practice:

- Materials in accessible formats are provided to people known to want accessible formats at the same time as the print version is sent out or delivered;
- Materials in accessible formats are available on request; and
- Print version and all media advertising clearly and prominently advise the availability of accessible formats (and/or assisted completion, if appropriate) and the means to request them.

Requested supply channel

These guidelines apply to forms that are included in any material that is sent (via post or e-mail) to someone on request or which can be selected or picked up from a distribution outlet (e.g. forms included in brochures distributed through displays in community organisations or government offices).

Sound practice:

- Requesters are offered material in one of a range of accessible formats;
- People are able to pre-order accessible formats for forms regularly made available on request (e.g. tax forms). The format of choice is captured in the organisation's client records and all future correspondence to the requester is provided in the format of request; and
- Print version and all media advertising clearly and prominently advise the availability of accessible formats (and/or assisted completion, if appropriate) and the means to request them.

Implementation principles

Sound practice:

- All forms, with their associated contextual/supplementary information, are available in a range of accessible formats;
- Accessibility for an individual is achievable through use of a combination of channels of interaction;
- Citizens are advised of the choices of formats and of interaction channels that are available to them; and
- Citizens are treated equitably, irrespective of their choice of formats or interaction channels.

Applying the guidelines



The best solution for users with disabilities is that forms and their associated information are accessible in every interaction channel, and available in every agency. However, the ANAO recognises that, for a range of reasons, this may not be possible for all Australian Government agencies to achieve in the short-term. Accordingly, in the meantime, making available multiple channels of interaction may enable the accessibility problem to be mitigated for the affected individuals. The aim is to ensure that a person is not disadvantaged and the quality of the information collected is not compromised.

Supporting information is critical for an individual to be able to make informed, independent decisions. In many cases, forms cannot be filled in correctly without reference to such information, as it provides instruction on which question relates to which area and the specific information that is required. While an individual may not be physically able to complete the form, they need to be provided with the opportunity to fully understand the requirements; so as to enable an uncensored opportunity to make independent decisions.

Appendix 3: Selected forms-extracts related to purpose of form

Figure A3.1

Form 2: *Farm Help claim.*

 Australian Government Department of Agriculture, Fisheries and Forestry	 Centrelink	<p style="text-align: right; font-size: small;">SU471A.0405 (Page 1 of 18)</p> <p style="text-align: right;">Claim for AAA – Farm Help – Supporting Families Through Change</p> <p><i>The AAA – Farm Help – Supporting Families Through Change program</i> is an initiative under the Australian Government's Agriculture – Advancing Australia (AAA) package.</p> <p>The AAA offers a range of programs including the Farm Help – Supporting Families Through Change initiative which provides assistance to farmers experiencing financial difficulties while they take steps to improve their long-term financial prospects. Farm Help encourages farmers on the program to work towards improving their farm's financial position, obtaining off-farm income, or re-establishing themselves off the farm.</p> <p>To qualify:</p> <ul style="list-style-type: none">• you must be an eligible farmer for Farm Help purposes and have been a farmer for a continuous period of at least 2 years immediately prior to applying for the program• you must be unable to borrow against your assets• you must not be involved in involuntary bankruptcy proceedings or have been issued with an eviction order or in any other way have lost control of the management of your farm enterprise• you must only have joined the Farm Help program a maximum of once previously and received less than 6 months Farm Help Income Support during that period• you must have attended an initial advice session which included a professional assessment of your farm enterprise's financial situation and an assessment of your ability to obtain finance, and• you must have developed a Farm Help Pathways Plan with your Centrelink Farm Help Contact Officer. <p>These requirements must be met before you can receive Farm Help assistance including income support payments, further advice and training and the re-establishment grant. However, if you are in hardship and require income support immediately you need to get a professional assessment of your farm enterprise's financial situation, an assessment of your ability to obtain finance and develop a Pathways Plan within 3 months of your income support being granted.</p> <p>NOTE: Customers who claim Farm Help Income Support on or after 1 July 2004 and cancel this entitlement to access Exceptional Circumstances Relief Payment, will not be able to re-apply for Farm Help Income Support.</p>
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Keep these Notes (pages 1 to 6) for your information.

Source: Centrelink, *Farm Help claim.*

Figure A3.2

Form 4: Youth Allowance claim



Australian Government



Centrelink

SV001.0505 (Page 1 of 36)

Claim for Youth Allowance

Youth Allowance
This claim is to be completed by or on behalf of the person
claiming Youth Allowance.

Source: Centrelink, *Youth Allowance claim*.

Figure A3.3

Form 8: *Child Support change initiated by CSA*



RICA

Your response:

CSA initiated change to your child support assessment

CSA 2898-07.2004

This form can **not** be submitted online

When CSA believes that the financial circumstances of parents are not reflected in their child support income amount, then CSA may consider changing the assessment.

Why do I need to complete this form?

CSA is considering changing your child support assessment. Both you and the other parent have an opportunity to give us information about your circumstances.

Source: CSA, *Child Support change initiated by CSA*

Figure A3.4

Form 9: *Child Support special circumstances application*



Your application:

changing your child support assessment in special circumstances

CSA 1970-6.2005

This form can *not* be submitted online.

[Help in other languages](#)

[The process for a change of assessment](#)

Source: CSA, *Child Support special circumstances application*.

Figure A3.5

Form 10: *Child Support special circumstances response*



Your response:

changing your child support assessment in special circumstances

CSA 1971–6.2004

This form can *not* be submitted online.

[Help in other languages](#)

[The process for a change of assessment](#)

Source: CSA, *Child Support special circumstances response*.

Figure A3.6

Form 12: *Medicare Smartcard registration*



Medicare

Medicare smartcard registration form

Please ensure you have read the *Instructions for completing the Medicare smartcard registration form*. It should come with this form. If not, please ask our Medicare staff for a copy.

1. This form can only be used by permanent residents who are Australian citizens or have a permanent resident visa.
2. Will there be more than one person registering for the Medicare smartcard on this form? ☐ Yes ☐ No
3. To register for a Medicare smartcard you need to be enrolled in Medicare. This form will allow you to do both.
You are registering for: ☐ Medicare enrolment ☐ Medicare smartcard ☐ Both

Source: Medicare Australia, *Medicare Smartcard registration*.

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