

Navigating HCD and PRA

Removing Blockers to HCD Research to Improve Customer Experience



The Paperwork Reduction Act (PRA) is a law that governs how federal agencies and their contractors collect information from the public. The PRA helps ensure that we are good stewards of the public's time, make decisions based on accurate and necessary data, and provide privacy protections.

It is essential and mandatory that CCSQ comply with the PRA when applying human-centered design (HCD) processes and methodologies. However, the PRA should not excuse utilizing HCD best practices to improve the customer experience. We encourage you to take advantage of the flexibilities and requirements that exist for compliance.

Getting Started

An essential part of compliance requires an understanding of when the PRA applies. Consider the following steps to get started.

Step 1: What information are you collecting and how many individuals will be included?

You need PRA clearance to proceed with research if you collect the same information from ten or more people or entities within a 12 month period. Common exemptions to the PRA generally include:

- Requesting the same information from fewer than ten people.
- Direct observation, such as qualitative usability tests and field studies.
- Open-ended requests for comments or feedback.
- Collecting information from federal employees related to their role or function.
- Discussions and questions at public hearings or meetings (whether in person or online).

Step 2: Who is providing the information?

Applicable members of the public governed by the PRA are vast. It includes individuals (including federal contractors and non-US citizens), businesses and associations, non-federal and foreign governments, and more. Ultimately, the only excluded individuals or groups are within the federal government or military (and even then, the PRA can sometimes be applicable).

Insight Generation

HCD research goals may require a combination of qualitative and quantitative research methods. The technique itself usually informs the number of people needed to complete a study.

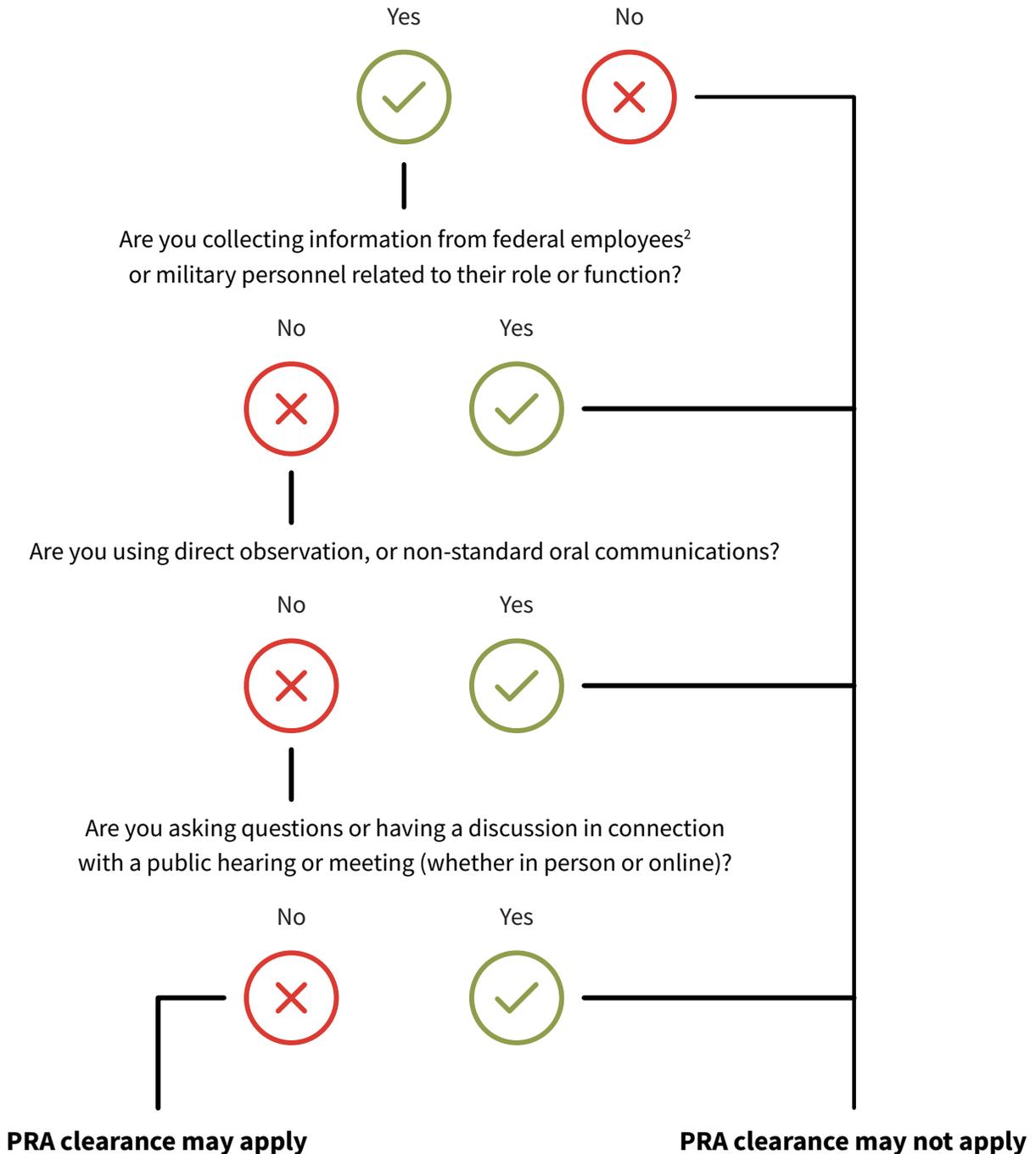
Qualitative research often does not require clearance because the number of people needed to complete a study for insight generation is under the PRA threshold or because a technique is not subject to the PRA. For example, qualitative methods often rely upon observation, non-standardized oral communication, and listening to a user's thoughts—which do not require PRA clearance (even if the number of people is ten or higher).

Resources

Digital.gov offers [A Guide to the PRA](#), which outlines a thorough process and provides resources to comply with the PRA, and [Touchpoints](#), which leverages a common feedback survey template that leverages an existing PRA clearance. Each CMS operational division has a PRA Officer who can assist with questions and obtaining PRA clearance.

PRA Decision Tree

Are you collecting the same information from 10 or more individuals or groups within a 12-month period?²



² Other exclusions to the PRA include: general request for public input and comments, such as “Tell Us About Your Experience” sheet or survey with open-ended space for someone to respond; information for voluntary commercial transactions like payment and delivery details; and sign-up forms to collect identifying information (for example, to sign up for a research panel).

HCD Research Methods and PRA Quick Reference Guide

Method	PRA clearance needed?	Best practices for number of test participants ¹
Qualitative		
Contextual inquiry	No	Nine or fewer individuals
Diary study	No	Nine or fewer individuals
Field study	No	Nine or fewer people, ten or more people if using non-standardized oral communication
Focus group	Yes	Ten or more individuals
Interview – scripted	Yes	Ten or more individuals
Interview – non-standardized	No	Nine or fewer people
Listening sessions	No	PRA does not apply since discussions and questions at public hearings or meetings are excluded
Persona – qualitative	No	Nine or fewer people
Usability study - qualitative	No	Five to eight people
Quantitative		
A/B testing	Yes	Ten or more individuals
Card sorting	No	15 individuals per user group; PRA exempts direct observation and non-standardized conversations.
Persona – statistical	Yes	Large sample size
Surveys, such as website satisfaction, customer satisfaction, or system usability scale	Yes	Large sample size
Tree testing	No	50 or more people; PRA exempts direct observation and non-standardized conversations.
Usability study, such as task completion or satisfaction survey	Yes	Large sample size

¹ The number of test participants is based upon HCD best practices for a research method. Some tests will require more individuals and some fewer. If a selected method requires ten or more individuals and standardized oral communication, then PRA clearance will be necessary; if a selected method requires nine or fewer individuals, then PRA clearance is not necessary.