

A person wearing a hard hat and safety vest is shown from a high angle, looking down at several documents and a calculator on a construction site floor. The floor has a patterned tile design. The image is overlaid with a blue geometric pattern on the right side.

# Technology, Data, and Design-Enabled Approaches for a More Responsive, Effective Social Safety Net

A LIVING REPORT BY THE  
BEECK CENTER FOR SOCIAL  
IMPACT + INNOVATION

UPDATED JANUARY 2021

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# About This Report

This living report — updated at regular intervals throughout 2020 — examines **data, design, technology, and innovation-enabled approaches that make it easier for eligible people to enroll in, and receive, federally-funded social safety net benefits.** Through our research, we seek to offer understanding of what tools and processes exist, which can be replicated, and what experts identify as overarching needs. We present new approaches that are possible and can be widely scaled, especially if there is the will to drive a large federal investment in a tech-enabled social safety net in the wake of COVID-19. As public<sup>1</sup> and legislative<sup>2</sup> appetites to fix the social safety net increase, we anticipate this living report will be of particular interest to leaders able to take integrated, system-wide action including government executives, policymakers, and philanthropic organizations. We also hope it promotes aligned efforts between organizations and government agency leaders responsible for implementing social safety net benefits.

The research for this report was done by Chad Smith and Sara Soka, fellows at the [Beeck Center for Social Impact + Innovation at Georgetown University](#), with assistance from student analysts Angela Guo and Elaina Faust. We thank Cori Zarek, Taylor Campbell, and Vandhana Ravi for their leadership and support. This work is supported by the Bill & Melinda Gates Foundation. The findings and conclusions contained within are those of the authors and do not necessarily reflect positions or policies of the foundation. The Beeck Center gratefully acknowledges the efforts and insights of the people, organizations, and government agencies that have been working in this ecosystem for years, especially this project's working group members, whose names and organizations follow.

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<sup>1</sup> For example, [a letter](#) dated March 26, 2020 from 11 Florida Congressional Representatives to Florida Governor Ron DeSantis states, “[W]e continue to hear from constituents that the website where all applications must be completed continues to malfunction, making it extremely difficult for individuals to even file a claim for unemployment benefits.... [W]e urge you to... investigate and mitigate challenges with the website.”

<sup>2</sup> “Living in the most technologically advanced and richest nation in history, SNAP online purchasing should have happened much sooner and much quicker,” said Salaam Bhatti, Staff Attorney at the Virginia Poverty Law Center, [in reference to a bill proposed by Minnesota Congressional Representative Ilhan Omar](#) in April 2020.

## Working Group Members and Organizations

The Beeck Center gratefully acknowledges this project's working group members for the advice that informed our research, recommendations, and this living report as well as the organizations where they work for their partnership and contributions to the field of public interest technology.<sup>3</sup>

**Ad Hoc** [Greg Gershman](#), CEO and Co-founder, and [Paul Smith](#), CTO and Co-founder

**Alluma** [Rea Pañares](#), Deputy Chief, Strategy and Innovation<sup>4</sup>

**Benefits Data Trust** [Pauline Abernathy](#), Chief Strategy Officer, and [Elisa Zygmunt](#), Senior Director of Strategy and Innovation

**City and County of San Francisco, Human Services Agency** [Marc Hébert](#), Lead, Human Services Agency's Innovation Office

**Civilla** [Lena Selzer](#), Design Director

**Code for America** [Tracey Patterson](#), Senior Director, [Eleanor Davis](#) and [Dustin Palmer](#), Senior Program Managers, Social Safety Net

**mRelief** [Rose Afriyie](#), Executive Director and Co-founder

**Nava** [Sha Hwang](#), COO and Co-founder, and [Zoe Blumenfeld](#), VP of Communications

**One Degree** [Rey Faustino](#), CEO and Founder<sup>5</sup>

### **State of Michigan, Department of Health and Human Services**

**18F** [informal members] [Elizabeth Ayer](#), Product Manager, [Mike Gintz](#), Strategist, [Alex Pandel](#), Director, Human Services Portfolio, [Alex Soble](#), Consulting Engineer

**Aspen Institute, Financial Security Program** [informal member] [Justin King](#), Associate Director

**New America, New Practice Lab** [informal member] [Cassandra Robertson](#), Research Consultant

**Urban Institute** [informal members] [Heather Hahn](#), Senior Fellow, and [Rayanne Hawkins](#), Policy Program Manager

<sup>3</sup> The views expressed in this document are those of the authors and not necessarily the positions of working group members or their organizations unless otherwise cited.

<sup>4</sup> Alluma and One Degree announced their merger on Oct. 8, 2020.

<sup>5</sup> Alluma and One Degree announced their merger on Oct. 8, 2020.

# Introduction

“Build back better” is a phrase borrowed from disaster recovery. At its core, this means when a system is damaged (or exposed as being damaged), the optimal repair uses all available resources to build back a stronger, more effective, and more resilient system.

Social safety net programs provide basic economic, food, and housing support to millions of low-income Americans.<sup>6</sup> The federal government funds social safety net benefits and sets eligibility standards based on household size, income, work status, and other characteristics. Federal agencies send funds to states to deliver and administer benefits, and shares the administrative costs with states. However, their eligibility, enrollment, and delivery processes are notoriously difficult for applicants to navigate.<sup>7</sup> As demand for benefits grew with the economic impact of the COVID-19 pandemic, the insufficient capacity and burdensome processes of the social safety net became painfully apparent to more people.

For example, a record 36 million unemployment claims were filed in the United States between March and June 2020.<sup>8</sup> Many newly unemployed people struggled to apply, facing overwhelmed call centers, websites, and physical lines outside of offices,<sup>9</sup> then waited a month or more for necessary cash assistance. Along the way, they negotiated lengthy verification processes and broken delivery systems,<sup>10</sup> and now face the added challenge of having unstable income during gaps between the implementation of stimulus package legislation.<sup>11</sup> Compounding these problems, longstanding structural inequities based on race, class, gender, and other factors have intensified the pandemic’s economic impacts, which have hit Black, Latinx, Indigenous, and immigrant communities disproportionately hard.<sup>12</sup>

The good news is that there are successful models for bringing social safety net benefit delivery up to contemporary standards. In the last decade, a number of

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<sup>6</sup> The Supplemental Nutrition Assistance Program (SNAP), previously known as food stamps, reached 38 million Americans in 2019, and federal rental assistance reached 10.4 million Americans according to recently available data.

Nchako and Cai. (2020). [A Closer Look at Who Benefits from SNAP: State-by-State Fact Sheets](#), Center on Budget and Policy Priorities; (2019). [Federal Rental Assistance Fact Sheets](#), Center on Budget and Policy Priorities.

<sup>7</sup> Davis et al. (2020). [Blueprint for a Human-Centered Safety Net](#), Code for America.

<sup>8</sup> Cohen and Hsu. (2020). [Rolling Shock’ as Job Losses Mount Even With Reopenings](#), New York Times.

<sup>9</sup> Marte and Sullivan. (2020). [Millions filed for U.S. unemployment - Many are Still Waiting for the Cash](#), Reuters.

<sup>10</sup> Haag, M. (2020). [They Filed for Unemployment Last Month. They Haven’t Seen a Dime.](#), New York Times.

<sup>11</sup> Gopnik and Collins. (2020). [A Tsunami of Volatility: The Impact of the Design and Implementation of the CARES Act Supplemental Unemployment Benefits on Lower-Income Households](#), Commonwealth.

<sup>12</sup> Parrott et al. (2020). [More Relief Needed to Alleviate Hardship](#), Center on Budget and Policy Priorities.

nonprofits and public benefit corporations have worked closely with government agencies and benefit recipients to make it easier to apply for social safety net benefits using technology, data, and design. For instance:

- Nonprofits [One Degree](#) and [Alluma](#) teamed up to offer Bay Area and Los Angeles residents an integrated, human-centered Medicaid and food assistance screener and application. Both the mobile app and website also provide a directory of local support services. The organizations merged in October 2020.<sup>13</sup>
- The nonprofit [Code for America's GetCalFresh](#) grew from a small fellowship pilot to make SNAP applications faster and easier in one California county in 2014. Six years later, in Spring 2020, GetCalFresh served as the entry point for 70% of all SNAP applications statewide in California, serving an average of 10,000 new applicants each day.<sup>14</sup>
- The nonprofit design studio [Civilla](#) worked with benefit applicants and the Michigan Department of Health and Human Services to [combine five benefit applications into one](#). The new application is 80% shorter and takes half the time to process.<sup>15</sup> The application is now available in a mobile-responsive, online format that allows users to manage changes to their benefits, upload documents and photos, and receive text notifications.<sup>16</sup>
- [Benefits Data Trust](#) uses data and process innovation to reach people who are likely eligible for benefits but not yet enrolled. The nonprofit analyzes data with government agencies to understand who receives certain benefits, but not others for which they probably qualify.<sup>17</sup> Their benefits specialists and call centers help people enroll in multiple benefits online, over phone and text, and in-person. Similarly, [mRelief](#), a Chicago-based nonprofit, offers people multiple ways to assess their eligibility for benefits and enroll, including plain-language SMS text, mobile and online platforms, and voice-assisted technology.<sup>18</sup>
- To ensure policy informs benefit implementation and vice versa, these organizations and their peers frequently partner with research and policy institutes, think tanks, and academic centers, such as the [Center on Budget and Policy Priorities \(CBPP\)](#), [New America](#), and the [Beeck Center for Social](#)

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<sup>13</sup> [One Degree: Empowering People to Apply for Health Coverage and Food Assistance through a Program Referral Service](#), Alluma.

<sup>14</sup> Patterson, T. (2020). Correspondence with author.

<sup>15</sup> [Streamlining the longest assistance application in America](#), Civilla.

<sup>16</sup> Ray-Montañez, L. (2019). [Safety Net Services Built for Outcomes](#), Code for America.

<sup>17</sup> Zygmunt, E. (2020). Correspondence with author.

<sup>18</sup> Elahi, A. (2020). [Are you eligible for food stamps? mRelief wants to help you find out](#), Chicago Tribune.

[Impact + Innovation](#). For example, the public benefit corporation [Nava](#), partnered with CBPP to issue [a report](#) investigating whether Remote Identity Proofing (RIDP) is legally required in online benefit applications, and explained the barriers that RIDP pose to people eligible for benefits.<sup>19</sup>

Federal government offices like the [U.S. Digital Service, 18F](#) and the [Lab at OPM](#) have demonstrated the power of using technology, data, and design-enabled approaches in government to investigate and improve social safety net benefit delivery.<sup>20</sup> State and local governments are also gradually changing approach (see, for example, [Colorado's Digital Service](#),<sup>21</sup> [California's Government Operations Agency](#),<sup>22</sup> the [New Jersey State Office of Innovation](#),<sup>23</sup> and [NYC Innovative Government](#)), yet challenges to implement modern software development and design practices, and leverage data to improve and shorten the benefit delivery process remain.

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<sup>19</sup> Wagner and Gaudet. (2020). [Removing Barriers to Access From Remote Identity Proofing](#), Center on Budget and Policy Priorities.

<sup>20</sup> [Medicare Payment System Modernization](#), U.S. Digital Service.

<sup>21</sup> Freed, B. (2019). [Colorado's New Digital Service Agency Aims at 'User-Centered' Projects](#), StateScoop.

<sup>22</sup> Wood, C. (2020). [California Gov. Newsom appoints two former San Francisco tech chiefs](#), StateScoop.

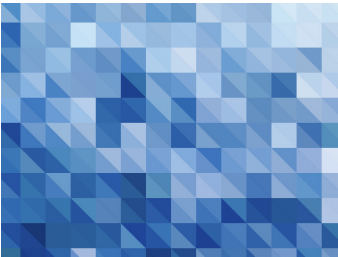
<sup>23</sup> [About the New Jersey Office of Innovation](#), Office of Innovation: State of New Jersey.

# The Federally-Funded Social Safety Net

<b>Education</b>	Federal Pell Grant Program	Assistance paying for undergraduate tuition and other higher education expenses for students with low incomes
	Head Start	Pre-school education for children in low income families
<b>Energy</b>	Low Income Home Energy Assistance Program (LIHEAP)	Energy assistance for people with low incomes
<b>Food</b>	Pandemic EBT (P-EBT) <b>Temporary</b>	Grocery electronic benefit transfer (EBT) cards for families with school-aged children eligible for free or reduced-price school meals
	Supplemental Nutrition Assistance Program (SNAP)	Grocery EBT cards for low income people to buy food at stores, farmers markets, and (where accessible) online
	The Emergency Food Assistance Program (TEFAP)	USDA commodity foods made available to people with low incomes at participating food pantries in their area
	Women, Infants and Children (WIC)	Food, nutrition education and counseling for pregnant women and women with children from birth to age five with low incomes
<b>Healthcare</b>	Affordable Care Act (ACA)	Subsidies to help pay for individual health insurance
	Children's Health Insurance Program (CHIP)	Assistance paying for children's health insurance for low income families who do not qualify for Medicaid
	Medicaid	Health insurance for low-income families and individuals; also Medicare premium and long term care support for low-income seniors and people with disabilities
	Medicare	Health insurance for people 65 or older, and some younger people who have specific disabilities or diseases
<b>Housing</b>	Housing Choice Vouchers, Section 8 Tenant Rental Assistance, and Public Housing	Rental assistance and housing provisions for people with low incomes
<b>Internet</b>	Lifeline	Internet and phone bill assistance for people with low incomes
<b>Income</b>	Earned Income Tax Credit (EITC)	Tax credit benefitting working people who have low to moderate income, especially families.
	Economic Impact Payment <b>Temporary</b>	Due to COVID-19, a cash payment of \$1,200 for individuals or \$2,400 for married couples and up to \$500 for each qualifying child
	Pandemic Unemployment Assistance <b>Temporary</b>	Cash assistance to eligible workers who have income negatively impacted by COVID-19
	Social Security (SS)	Cash payments to retirees who have made SS contributions
	Social Security Disability Insurance (SSDI)	Cash payments to disabled people who have made contributions to Social Security
	Supplemental Security Income Program (SSI)	Cash assistance for elderly, blind, or disabled people with limited incomes who have made contributions to Social Security
	Temporary Assistance for Needy Families (TANF)	Cash and noncash (child care, transportation, etc.) assistance for low income families
	Unemployment Insurance	Cash assistance to eligible workers who become unemployed through no fault of their own



This report focuses on innovations to deliver the federally-funded social safety net benefits offered to people with low incomes, who are out of work, or working but struggling to afford basic needs. Making eligibility determination, enrollment, and delivery of these benefits less burdensome can help people already facing difficult financial trade-offs and demands on their time<sup>24</sup> to eventually reach greater economic sufficiency and security.



*Making eligibility determination, enrollment, and delivery of these benefits less burdensome can help people already facing difficult financial trade-offs and demands on their time to eventually reach greater economic sufficiency and security.*

This report comes at a time when policy and regulations affecting social safety net benefits are more in flux than usual. In response to COVID-19, the federal government passed the [Families First Coronavirus Response Act](#) and the [Coronavirus Aid, Relief, and Economic Security \(CARES\) Act](#). These laws expanded the duration, amount, and eligibility requirements for some social safety net benefits, including income assistance (temporarily expanding the amount and length of unemployment insurance, and making funds available to self-employed and gig workers, who ordinarily wouldn't be eligible)<sup>25</sup> and food benefits (SNAP and P-EBT). Of particular interest in these pieces of legislation is the opportunity for states to request temporary waivers from certain federal regulatory requirements, which would allow states to change their processes for benefit enrollment and verification. For example, states were granted the option to make changes to SNAP that allow for faster application processing, waiving requirements for in-person interviews and certain recording requirements for telephonic signatures.<sup>26</sup>

These waivers are promising regulatory changes to advocates for human-centered benefit delivery, but they are temporary, and evidence that the ability to make technological and service design improvements depends on the levers and constraints of policy and regulation. The extended Summer and Fall 2020 legislative debates over COVID-19 relief bills put these changes at risk even while the pandemic

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<sup>24</sup> In 2019, Code for America published a microsite called "[Why Californians Need Food Assistance](#)" that detailed statistics about SNAP users alongside their quotes. One user illustrated the difficult decisions benefit applicants make: "I have a car payment that's \$336 every month and a weekly daycare bill of \$175. After rent, the phone bill, and gas, I have nearly nothing to spend on food. I often don't eat so that my child can eat."

<sup>25</sup> Parrott et al. (2020). [CARES Act Includes Essential Measures to Respond to Public Health, Economic Crises, But More Will Be Needed](#), Center on Budget and Policy Priorities; Stone C. (2020). [CARES Act Measures Strengthening Unemployment Insurance Should Continue While Need Remains](#), Center on Budget and Policy Priorities.

<sup>26</sup> Rosenbaum et al. (2020). [USDA, States Must Act Swiftly to Deliver Food Assistance Allowed by Families First Act](#), Center on Budget and Policy Priorities; (2020). [Most States Are Using New Flexibility in SNAP to Respond to COVID-19 Challenges](#), Center on Budget and Policy Priorities.

and its economic impact continues; federal supplemental unemployment benefits ran out September 5, 2020.<sup>27</sup> Congress passed a continuing resolution to extend SNAP waiver extensions and P-EBT funding on September 29, 2020,<sup>28</sup> but without passage of broader legislation, federal supplemental unemployment will remain discontinued,<sup>29,30,31</sup> worsening already extensive hardship.<sup>32</sup>

Research published in October 2020 by [Columbia University](#), matched by findings from [the University of Chicago and the University of Notre Dame](#), indicates that the economic aid granted to the unemployed as a result of the CARES Act kept more than 18 million people from poverty in May 2020. After the CARES Act funds were expended by September 2020, that number dropped to four million.<sup>33,34</sup> [H. Luke Shaefer](#), a poverty researcher at the University of Michigan, [said to the New York Times](#) in reaction to these data that, “[The CARES Act] wasn’t perfect, but hands down it’s the most successful thing we’ve ever done in negating hardship.”<sup>35</sup>

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<sup>27</sup> Schwartz, N. (2020). [\\$300 Unemployment Supplement Is Starting to Flow, but Only Retroactively](#), New York Times.

<sup>28</sup> Cannon M. (2020). [Congress Passes Short Term Funding Bill - Joint Statement from Advocates](#), California Food Policy Advocates.

<sup>29</sup> Stone, C. and Parrott, S. (2020). [Many Unemployed Workers Will Exhaust Jobless Benefits This Year If More Weeks of Benefits Aren't in Relief Package](#), Center on Budget and Policy Priorities.

<sup>30</sup> Pinsker, J. (2020). [The Pandemic Recession is Approaching a Dire Turning Point](#), Atlantic.

<sup>31</sup> Greenstein, R. (2020). [Greenstein: New Relief Proposal Well Designed, Urgently Needed](#), Center on Budget and Policy Priorities.

<sup>32</sup> Cohen, P. et al. (2020). [Extra \\$600 a Week Kept Many Jobless Workers Afloat. Now What Will They Do?](#), New York Times.

<sup>33</sup> Parolin, Z. et al. (2020). [Monthly Poverty Rates in the United States during the COVID-19 Pandemic](#), Poverty and Social Policy Discussion Paper, Center on Poverty and Social Policy.

<sup>34</sup> Meyer, B. D. and Sullivan, J. X. (2020). [Near Real Time COVID-19 Income and Poverty Dashboard](#), University of Chicago Harris School of Public Policy; University of Notre Dame Wilson Sheehan Lab for Economic Opportunities.

<sup>35</sup> DeParle, J. (2020). [8 Million Have Slipped into Poverty Since May as Federal Aid Has Dried Up](#), The New York Times.

# Priorities for a Responsive, Effective Social Safety Net

In assembling this report about the technological, data, and design-enabled tools and practices to make social safety net benefits easier to access and administer, we sought to present both structural, overarching recommendations as well as smaller-scale, tactical improvements. This is a broad scope, and our assessment could not possibly cover all topics. When selecting what to feature, we focused on recommendations repeated by multiple sources and those that have particular resonance in 2020, when the pandemic has tried the capacity of existing benefit delivery systems and racial justice continues to be a primary concern for the nation. Our sources include publications by leading organizations in the field, interviews and conversations with practitioners, and media articles.

Here is a short list of recommendations (in no particular order) based on our research. Explanations about each recommendation, with supporting resources and direction, follow this list.

## Recommendations

1. [Invest in Government Technology Made of Modular, Linked Software Components Rather than Monolithic Systems](#)
2. [Establish Linkages Across Government Datasets](#)
3. [Activate Policymakers to Think Like Designers](#)
4. [Value User Research Throughout the Work](#)
5. [Accelerate Government Transformation that Supports Better Benefit Delivery](#)
6. [Use Text and Voice Enrollment and Recertification Options](#)
7. [View Social Safety Net Benefit Policy and Delivery through the Lens of Racial Justice](#)
8. [Use Alternatives to Remote Identity Proofing](#)
9. [Remove Barriers Caused by EBT Authorization Requirements](#)
10. [Design Better Approaches for Delivering Cash Assistance](#)

# Invest in Government Technology Made of Modular, Linked Software Components Rather than Monolithic Systems

Subject matter experts in government technology<sup>36</sup> shared that the commonly used, monolithic systems that government agencies have historically used tend to be difficult to build and update without major risk and cost, creating prolonged obstacles to social safety net benefit delivery. In contrast, a network of individual software components or applications with specific purposes – created using modern API-driven software development techniques – can form an interoperable backend. It can be built, updated, shared, or replaced individually and with agility, without requiring major system interruptions or replacement of entire systems.

**Technologists refer to this as service-based architecture.**

While modular, linked systems are considered an ideal for many technologists working with governments, we've also heard that it's been difficult for states to attempt this because of constant pressure to deliver services (now exacerbated by the COVID-19 related economic crisis). Other barriers mentioned include not having enough staff with modern design and software engineering skills, the length and cost of existing vendor contracts, and antiquated procurement practices. Security is often a concern, too.

## Resources from Experts in the Field

- [De-Risking Guides \[to delivering successful custom technology projects in government\]](#) (2020). Produced by Robin Carnahan, Randy Hart and Waldo Jaquith (State Guide) and Mark Hopson, Victoria McFadden, Rebecca Refoy and Alicia Rouault (Federal Guide) of 18F.
- [Prerequisites for Modular Contracting](#) and [An Agile Software Development Solicitation Guide](#) (2019). Produced by Waldo Jaquith, Randy Hart, Mark Hopson, and Vicki McFadden of 18F.
- [Digital Services Playbook](#) (last edited in 2020). Produced by the U.S. Digital Service.

<sup>36</sup> Hopson, M. et al. (2020). [De-risking Guide: Federal Field Guide](#), 18F; Carnahan, R. et al. (2020). [De-risking Guide: State Field Guide](#), 18F.

## Recommendations and Opportunities to Scale

- One approach to test this priority could involve a pilot, involving several states with leadership that's committed to building a linked, modular backend, and leveraging current momentum to modernize the social safety net benefit system. State agency stakeholders and subject matter experts who understand this issue should be involved in deciding what's feasible.
- While certain states stand out as having technology teams or leadership that could be receptive to a pilot (such as California, Colorado, or Michigan), determining the states involved should involve a wider scan of readiness factors, similar to [Code for America's selection process for their Integrated Benefits pilots](#).<sup>37</sup> One step that was suggested and could help determine selection, or be done in parallel, is a 50-state scan of backend interoperability. This scan would extend to all state agencies involved in social safety net benefit delivery, in the style of [Code for America's 50 state scan of online, integrated, and mobile benefit applications](#).<sup>38</sup>

## Establish Linkages Across Internal State Agency Datasets

One common inefficiency raised in social safety net benefit delivery is that applicants often need to fill out multiple benefit applications and submit income verification to separate state agencies.<sup>39</sup> This creates a clear burden for people who are already experiencing difficult circumstances, and incurs additional work for eligibility workers. When the state and local agencies that administer different benefits link their datasets at specific points, it allows benefit eligibility determination, enrollment, and delivery data to be shared and the process becomes streamlined. It also lays the groundwork for the creation or expansion<sup>40</sup> of integrated benefits applications, the capacity to effectively deliver emergency benefits like Pandemic EBT, and opportunities to make people aware of benefits they are eligible to receive but not yet enrolled in.<sup>41</sup> While many states already use cross-benefit linkages to varying degrees, the practice is not yet optimized.


<sup>37</sup> [Integrated Benefits Initiative](#), Code for America.

<sup>38</sup> (2019). [Bringing Social Safety Net Benefits Online](#), Code for America.

<sup>39</sup> [Simple Actions / Blueprint for a Human-Centered Safety Net](#), Code for America.

<sup>40</sup> Ambegaokar et al. (2017). [Opportunities to Streamline Enrollment Across Public Benefit Programs](#), Alluma.

<sup>41</sup> Lane, K. (2019). [Maximizing Linkages: A Policymaker's Guide to Data-Sharing](#), Alluma.



*While many states already use cross-benefit linkages to varying degrees, the practice is not yet optimized.*

One established data linkage tool is [Fast Track](#), a federally-enacted mechanism that allows states to simplify Medicaid enrollment by using data from other benefit programs, like SNAP and TANF. Code for America's [LA'MESSAGE texting pilot](#) reached substantially more Medicaid recipients in Louisiana because the state had previously opted in to Fast Track.<sup>42,43</sup> A similar mechanism, [Express Lane Eligibility](#), simplifies enrollment in the Children's Health Insurance Program (CHIP) allowing for data linkages not only from SNAP and TANF, but Head Start, WIC, and the National School Lunch Program.

### Resources from Experts in the Field

- [Opportunities to Streamline Enrollment Across Public Benefit Programs](#) (Nov. 2017). Produced by Sonal Ambegaokar of Social Interest Solutions, now Alluma,<sup>44</sup> and Zoë Neuberger and Dorothy Rosenbaum of the Center on Budget and Policy Priorities.
- [Maximizing Linkages: A Policymaker's Guide to Data-Sharing](#) (April 2019). Produced by Khaliyl Lane of Social Interest Solutions, now Alluma.
- [Fast Track: A Quicker Road to Medicaid Enrollment](#) (Dec. 2019). Produced by Jessica Maneely of Benefits Data Trust.
- [The State Hub Roadmap: CDSS \[California Department of Social Sciences\] CalFresh and CalWORKs Streamlining Verifications](#) (Nov. 2018). Produced by Social Interest Solutions, now Alluma.

### Recommendations and Opportunities to Scale

- Alluma and the Center on Budget and Policy Priorities [co-authored a white paper](#) that explains pathways to create linkages between specific social safety net benefits.<sup>45</sup> A [subsequent paper](#) from Alluma provides guidance on data-sharing agreements and privacy regulations.<sup>46</sup> Policymakers and

<sup>42</sup> (2019). [LA'MESSAGE Pilot: Text Reminders in Louisiana](#), Code for America.

<sup>43</sup> (2016). [Louisiana Receives Approval for Unique Strategy to Enroll SNAP Beneficiaries in Expanded Medicaid Coverage](#), Healthy Louisiana, Louisiana Department of Health.

<sup>44</sup> Social Interest Solutions rebranded as Alluma in July 2019.

<sup>45</sup> Ambegaokar et al. (2017). [Opportunities to Streamline Enrollment Across Public Benefit Programs](#), Alluma.

<sup>46</sup> Lane, K. (2019). [Maximizing Linkages: A Policymaker's Guide to Data-Sharing](#), Alluma.

administrators interested in expanding data sharing opportunities can review these papers for advice and best practices.

- To use Fast Track, states must be approved by the Centers for Medicare and Medicaid Services by applying for a temporary waiver or a more permanent State Plan Amendment. A [December 2019 brief from Benefits Data Trust](#) explains these options in detail and offers case studies.

## Activate Policymakers to Think Like Designers

In response to the economic crisis caused by the COVID-19 pandemic, policymakers issued mandates to government agencies to implement rapid relief measures. One widely-known relief measure is the Economic Impact Payment, issued in late March 2020 as part of the CARES Act. Intended to provide immediate cash relief to low- and middle-income U.S. citizens, the initial mechanism used to send relief — direct deposit into the bank accounts that payment recipients had on record with the IRS — categorically missed delivering funds to as many as 10 million low-income Americans who don't earn enough to typically be required to file taxes.<sup>47</sup>



*“A ‘broken pipe’ moment is when policies do not meet their intended purpose because of difficulties in implementation.”*”

Though policymakers were under extreme pressure to deliver the CARES Act funding quickly, this divergence between policy intent and delivery is common even in long-deliberated policies (think of the Affordable Care Act), and reduces the effectiveness of social safety net benefit delivery. Cecilia Muñoz, New America's Vice President for Public Interest Technology and Local Initiatives, calls instances like these, when policies do not meet their intended purpose because of difficulties in implementation, an example of a “broken pipe.” She notes that policymakers and advocates spend most of their effort and resources crafting and debating elements of policies, largely ignoring factors that affect implementation, and letting assumptions about implementation go untested.<sup>48</sup> Code for America expands on this topic in a white paper published in November 2019 called *Delivery-Driven Policy*:

“... [The implementation] failure is not deliberate; it is the result, in part, of an outdated model that keeps policymaking and policy implementation as separate domains, with separate skills and incentives.... Code for America, the

<sup>47</sup> Maag, E. (2020). [Low-Income Workers Without Children May Miss Out On The Coronavirus Rebates](#), Tax Policy Center.

<sup>48</sup> Talk delivered by Cecilia Muñoz to U.S. Digital Response volunteers, cited with permission of the speaker. (2020).

United States Digital Service, 18F, and many others have made the case that a user-centered, iterative, and data-driven approach can result in digital technology that provides [data and insights to improve government service delivery], and at a far lower cost. The real benefit, however, is when those same practices — user-centered, iterative, and data-driven — are applied to the policymaking process as well.”<sup>49</sup>

At Code for America’s 2016 Summit, Muñoz explained how she became a champion for this approach.<sup>50</sup> As the Director of the Domestic Policy Council under President Obama, her policy team took the opportunity to collaborate with digital and design professionals from the U.S. Digital Service. “Not only did they solve [our technological] problem,” she stated, “[they also] convinced the team to step back, talk to users, and design the service differently.”

The more that policymakers and government staff are able to work with design teams, and ultimately apply design skills themselves, the more they can effectively engage with the people their policies aim to serve and the people who understand implementation pipelines. [The New Practice of Public Problem Solving](#), published in the Stanford Social Innovation Review, spells out the process in actionable steps.<sup>51</sup> Most notably, it encourages policymakers to engage in user-centered design to make sure the objective of their policy, which is to affect people's lives, guides the design of their policy.

Our initial research revealed that two of the biggest barriers to developing multidisciplinary, design-savvy teams in government are resource strain and perceived cultural differences. Many state and federal agencies don’t yet have staff with modern design skills or resources to add staff with this skillset or build capacity among current staff. As a contact at 18F said, “When you do work with state staff, they get it. But they often don’t have the resources to change things because they’re under so much pressure to deliver.” Furthermore, many people working in policy and government don’t associate skills held by technical professionals as something that’s relevant to their work. Cecilia Muñoz explained it like this:

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<sup>49</sup> (2019). [Delivery-Driven Policy](#), Code for America.

<sup>50</sup> [Jennifer Pahlka’s Opening Remarks with Cecilia Muñoz](#). (2016). Code for America Summit.

<sup>51</sup> McGuinness and Slaughter. (2019). [The New Practice of Public Problem Solving](#), Stanford Social Innovation Review.



“Getting in the door is absolutely the hardest part because we’re not yet great at explaining what [a design based approach] is in a way that [policymakers and government staff] understand. We tend to show up in a crisis. A crisis turns out to be when it’s of greatest need, but it’s also a much harder time to get people to understand what’s possible. We’re asking people to change the ways they work using a vocabulary that they don’t know yet. So it’s like people who speak another language coming in to help, and you don’t know the language, and you don’t understand what tools they’re wielding.”<sup>52</sup>

A third barrier is a lack of incentive to spend time investigating user needs and implementation pipelines closely because of the pace and quid pro quo nature of policy making. Future research could investigate precedents for policy, regulation, or procurement standards that incentivize user-centered policymaking, focused on social safety net benefit delivery.

### Resources from Experts in the Field

- [Delivery-Driven Government](#) (May 2018). Produced by Code for America with inspiration from Mike Bracken, Jake Solomon, David Eaves, and Ben McGuire.
- [Delivery-Driven Policy](#) (Nov. 2019). Produced by Code for America with input by New America, and the Beeck Center for Social Impact and Innovation at Georgetown University.
- [The New Practice of Public Problem Solving](#) (Spring 2019). Produced by Tara McGuinness and Anne-Marie Slaughter of New America; published in the Stanford Social Innovation Review.
- [Helping Policy Makers Put People First: A Step-by-Step Tool for User-Centered Policy Making](#) (May 2020) and [Project Redesign’s Pandemic Unemployment and the Social Safety Net](#) (Aug. 2020). Produced by Dana Chisnell, Grace Cho, Aesclinn Donohue, Vivian Graubard, Cyd Harrell, Ginny Hunt, Rebecca Micheleson, Alberto Rodríguez Álvarez, and Lindsey Wagner.
- [Rapid Implementation of Policy as Code](#) (May 2020). Produced by Alex Soble and Mike Gintz of 18F.

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<sup>52</sup> Talk delivered by Cecilia Muñoz to U.S. Digital Response volunteers, cited with permission of the speaker. (2020).

## Recommendations and Opportunities to Scale

- While government innovation teams are becoming more common, it's still rare to have policy, technical, and design staff, and subject matter experts from inside and outside government come together at the beginning of policy processes. Future research may examine successful precedents for investing government resources in design, and what organizations could assist in learning the practice, like
- The professional cultural differences between policymakers, government staff, and technologists may not be as great as perceived. Design teams could explore ways to explain their methods in alignment with analog practices these groups know and can be highly skilled in, like constituent and community engagement. Related to this, policymakers and government staff who have engaged in design practices that have been successful tend to be the most persuasive champions for the process to their peers.
- Build pipelines for direct user feedback into government services as a source of continual feedback that informs implementation and policy, not just during initial product, content, and service development. For example, Code for America ethically [uses the comments people share within the GetCalFresh online platform](#) to improve the application and convey people's needs and experiences to larger audiences.
- Just as policymakers may write more effective policy and regulation by working with technologists and adopting design practices, civic designers' and technologists' work can benefit from an understanding of the public administration and the policy process. Relationships cultivated between these two professions can make it easier to communicate when time is of the essence to assure policy and regulations are written to make implementation easier for benefit recipients and agency staff.

## Value User Research Throughout the Work

In Michigan, [Project Re:Form](#) demonstrated how to design a faster, simpler, and more humane application for social safety net benefits. Michigan's previous application was the longest of its kind in the United States, at over 40 pages.<sup>53</sup> The new integrated benefits application, which combines Michigan's SNAP, Medicaid, TANF, childcare, and energy assistance applications, won the [Core77](#) 2019 Service Design Award.<sup>54</sup> This project, called "...a blueprint for lasting and effective government change," by [GovTech Magazine](#)<sup>55</sup> and "...some of the best work I've done in my 35 years of public service," by a Michigan Department of Health and Human Services leader<sup>56</sup> was celebrated for its human-centered, streamlined design, rooted in user research at every stage of development and implementation.

Project Re:Form, hosted on paper and online through [MI Bridges](#), is a product of a multiyear collaboration between Detroit design studio [Civilla](#), the Michigan Department of Health and Human Services (MDHHS) and, as Civilla put it, "...community partner organizations, community members, and volunteers who dedicated their time, talent, and energy to making this work possible."<sup>57</sup>

Lena Selzer, Civilla's Design Director, explained how user research improves products and services throughout the development process.

"A lot of user research is focused on the beginning of a project. There's a research phase that informs recommendations, but then it's common for a separate team to work on implementing them. At Civilla, end-to-end user research means that we're committed to having research inform the full design, development, and implementation processes. Users inform what we should be building, the designs themselves, and give feedback to guide improvements through user testing. They shape how we train staff and communicate back to the community and other stakeholders. This is very different from what typically happens, when user research is engaged at just one stage."<sup>58</sup>

This view emphasizing the value of end-to-end user research is echoed by other organizations that are improving the effectiveness of social safety net benefit delivery. [Code for America](#) plans user research through multiple phases (discovery, prototype, scaling, and evaluation) to generate understanding and explore

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<sup>53</sup> (2019). [Winner, Service Design Award, Project Re:Form](#), Core77 Design Awards 2019.

<sup>54</sup> Ibid.

<sup>55</sup> Quaintance, Z. (2018). [Blueprint for Human-Centered Change](#), Government Technology.

<sup>56</sup> (2019). [Winner, Service Design Award, Project Re:Form](#), Core77 Design Awards 2019.

<sup>57</sup> Ibid.

<sup>58</sup> Seltzer, L. (2020). Conversation with author.

opportunities, refine and test prototypes, improve products and delivery, and assess impact.<sup>59</sup> The concept of delivery-driven policy uses a similar model, one in which teams of policymakers, technologists, users, and other subject matter experts “...iterate progressively on the policy and delivery together. They also build instrumented delivery systems that provide near-real-time feedback, creating mechanisms for experimentation that can inform policy development with the knowledge of what’s actually working towards the original intent.”<sup>60</sup>

The federal government’s technology agencies, the [U.S. Digital Service](#) and [18F](#), advise “...involv[ing] end users early and often in software development efforts” to reduce risk and build effective digital services.<sup>61</sup> The value of this approach is demonstrated in quantitative and qualitative outcomes, again, explained by Lena Selzer of Civilla.

“We’ve heard that people have a hard time getting [government] leaders to commit to user research, or that they’re only able to do it in a shortcut way. That’s why mixed methods research and quantitative data are important. Pilots create a quantitative case for the work, demonstrating how being user-centered drives business imperatives, improves results and return on investment. When projects don’t have quantifiable results, for better or worse they don’t get prioritized. However, we also use storytelling and immersive experiences to bring to life the situations and experiences of people who need these services and staff who serve them.”<sup>62</sup>

For example, Re:Form led to an application that is 80% shorter and can be processed in half the time, and the Michigan Department of Health and Human Services finds these gains beneficial.<sup>63</sup> Their partnership and attention to user research continues; building on the success of the new benefits application, Civilla and MDHHS launched a new phase of work focused on designing simple and intuitive recertifications. These new forms, made available in paper and online in August 2020, resulted in 95% of recertifications coming back to the agency on time, 96% completion rates, a 60% reduction in participant errors, a 50% reduction in lobby visits, and a 15% increase in overall recertification success rates.<sup>64,65</sup>

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<sup>59</sup> Rappin, N. et al. (2020). [Qualitative Research Practice Guide](#), Code for America.

<sup>60</sup> (2019). [Delivery-Driven Policy](#), Code for America.

<sup>61</sup> Hopson, M. et al. (2020). [De-risking Guide: Federal Field Guide](#), 18F; (2020 revision). [Digital Services Playbook](#), US Digital Services.

<sup>62</sup> Seltzer, L. (2020). Conversation with author.

<sup>63</sup> (2019). [Winner, Service Design Award, Project Re:Form](#), Core77 Design Awards 2019.

<sup>64</sup> (2020). [MDHHS launches streamlined renewal forms making it simpler to keep critical benefits during COVID-19; Project Re:New improves client experience across four largest assistance programs as more families and individuals need help](#), Michigan.gov.

<sup>65</sup> Seltzer, L. (2020). Conversation with author.

## Resources from Experts in the Field

- [The Qualitative Research Practice Guide](#) (2020). Produced by Nicole Rappin, Matthew Bernius, Deirdre Hirschtritt, Aditi Joshi, Taranamol Kaur, Cesar Paredes, and Julie Sutherland at Code for America.
- [Conducting Research with a Healing Mindset](#) (2020). Produced by Aditi Joshi of Code for America.

## Recommendations and Opportunities to Scale

- Civilla's Lena Selzer says they've received multiple requests from government staff for guidance in including human-centered design in their requests for proposals (RFPs). She advises that RFPs not treat user research as one piece of an already-defined project but as an approach and tool that is used throughout to define and develop the solution. She also suggests that government agencies use user research to direct their charters or long term strategic plans.<sup>66</sup>
- Similarly, government staff have asked for assistance or best practices to assess the quality of human-centered design in vendors' proposals. Though many vendors now incorporate human-centered design into their services, there are marked differences in approach and depth.<sup>67</sup>
- During a crisis like COVID-19, [rapid user research techniques](#) may be useful to understand and address urgent changing situations. Nonetheless, user research should still inform multiple phases of the work (discovery, prototype, scaling, and evaluation).

# Accelerate Government Transformation that Supports Better Benefit Delivery

States, municipalities, and federal government agencies are making technological, data, and design-enabled changes to their own internal structures and approaches, which can lead to organization-wide transformation. Establishing these skills and methods in-house, rather than solely relying on outside vendors or partners, allows governments to reimagine how they carry out their missions and provide services including safety net benefits. Many factors contribute to governments' rates of

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<sup>66</sup> Ibid.

<sup>67</sup> Seltzer, L. (2020). Conversation with author.

change. [One maturity model for public sector digital service teams](#) was developed in 2018 at a convening hosted by the Harvard Kennedy School,<sup>68</sup> informed by nine countries' digital service teams. It breaks down supports and barriers into six categories, summarized in brief here:

- **Political Environment.** Breadth of political sponsorship, level of involvement in top-priority projects, and codification (e.g., digital services department is enacted by executive branch decree or legislation).
- **Institutional Capacity.** Adoption of [Agile methodology](#) across departments with support from a centralized digital service agency, and sustainable funding.
- **Delivery Capability.** Adaptive capacity to use new tools and respond to public needs, and incorporate user feedback cycles (e.g. use beta versions).
- **Skills and Hiring.** Ability to hire technical positions in government (e.g., UX Designer), with training and pipeline programs in place in schools of public service.
- **User-Centered Design.** UX research and testing is expected in new service development and rollout, a design approach is used in policy development and agency rulemaking, product management roles are standard.
- **Cross-Government Platforms.** Public data is published with APIs, standard rules exist for data sharing across government departments, common needs are covered by shared platforms.

Similarly, Bloomberg Philanthropies' What Works Cities initiative published [criteria for data-driven local government](#) in a 2018 assessment.<sup>69</sup> It measures capacity and standards in data governance, evaluations, general management/political support, open data, performance and analytics, repurposing data, results-driven contracting/procurement, and stakeholder engagement.

While these collective factors can spur accelerated change to benefit delivery systems, there is not just one model for success, and the real measure is delivering value to [residents].<sup>70</sup> As we interact with more experts in this space, we will identify additional models and explore whether certain factors accelerate or slow progress more in their estimation.

The element of urgency can act as a catalyst to accelerate change to benefit delivery. Whether that means policymakers are compelled to engage a technical team to deliver a service the president requests, which is what drove Cecilia Muñoz's team to

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<sup>68</sup> Eaves and McGuire. (2018). [Part 2: Proposing A Maturity Model for Digital Services](#), Harvard Kennedy School.

<sup>69</sup> (2018). [What Works Cities Assessment Guide - What Works Cities Certification](#), Work Works Cities.

<sup>70</sup> Eaves and McGuire. (2018). [Part 2: Proposing A Maturity Model for Digital Services](#), Harvard Kennedy School.

work with the U.S. Digital Service for the first time under President Obama’s administration,<sup>71</sup> or that a sharp increase in SNAP demand during COVID-19 drives the need to process more applications faster, these events can create unified purpose and strip away systemic or cultural barriers to change.

### Resources from Experts in the Field

- [Proposing a Maturity Model for Digital Services](#) (2018). By David Eaves and Ben McGuire in collaboration with multiple digital service teams.
- [What Works Cities Assessment Guide](#): Certification criteria for data-driven local government (2018). By What Works Cities Medium authors.

### Recommended Training Centers

- [Leadership for a Networked World](#) provides a combination of executive education, real world case studies, and learning insights that help leaders and policymakers across disciplines and sectors improve organizational outcomes and value.
- [Peak Academy](#) trains city employees at all levels to improve the way government works. The training methodology measures success through hard-dollar budget savings as well as soft-dollar efficiency savings realized by city employees after participating in classes. Soft-dollar savings are calculated by monetizing the amount of staff hours freed up because of process improvement changes that can then be reallocated to other programs or service delivery within the agency.
- [Future Services Institute](#) partners with state agencies, counties, tribal nations, community organizations, non-profits, and foundations, among others to build and test human service delivery best practices in innovation-driven projects, leadership development programs, and evaluation and research efforts.

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<sup>71</sup> [Jennifer Pahlka's Opening Remarks with Cecilia Muñoz](#). (2016). Code for America Summit.

## Case Study: Engaging Training Programs to Enhance Human-Centered Service Delivery and Program Design in Minnesota County Agencies

**Problem:** Minnesota’s Olmsted and Dakota Counties wanted to address the [benefits cliff](#) – when the working poor reach a point where a one-dollar increase in their hourly wage can result in a significant reduction in benefits. The outcome is that the added income will not make up for the loss of SNAP, Medicaid, EITC, TANF, subsidized housing, and other benefits designed to help people in or near poverty.

<sup>72</sup>

**Who was involved:** The Olmsted County Department of Health, Housing, and Human Services; Dakota County; and the Future Services Institute, based at the University of Minnesota’s Humphrey School of Public Affairs.

**How the training program helped:** The [Future Services Institute](#) formed as a training program for generating stronger outcomes in human-centered program design. According to founding team member Paul Fleissner, who is also the Deputy County Administrator of Olmsted County Health, Housing, and Human Services, “The Humphrey School of Public Affairs created the Minnesota Future Services Institute in partnership with Dakota and Olmsted County. The program provides technical assistance around things like evaluation, human-centered design, and community engagement to get people trained as leaders in the human services system around equity and integrated services.” The transcript from the conversation with Paul Fleissner can be viewed [here](#), and covers how the partnership was formed, what pre-work occurred, and how the work is standing the test of time. Before starting down this path, Paul also mentioned his experience at [Leadership for a Networked World](#) which sparked the decade-long county transformation.

*“Again, I want it on record. When I have that single mom with two kids, one in childcare, one in school and in Minnesota and in my county — when they hit 19 bucks an hour, they take the next buck and they try to improve their income, they start to lose benefits at a much higher rate than they earn income, up to the point where for every dollar extra they’re making, they’re losing eight-and-a-half in benefits. No one does that. We always hear about the extraordinary effort when somebody gets out of the system. Well, maybe that happens once in a while, but why does our data look the same as it did as a nation 40 years ago? For us, the Future Services Institute, we may have had big dreams, but how do you get there?”*

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<sup>72</sup> Perez, P. (2018). [Examining, Understanding, and Mitigating the Benefits Cliff Effect](#), aha! Process Inc.



- Deputy County Administrator [Paul Fleissner](#), Olmstead County Health and Human Services and Founding Team Member, University of Minnesota's Humphrey School of Public Affairs Minnesota Future Services Institute

Below are key learnings for government agencies seeking similar transformations to human-centered program design.

**Success factors:**

- Identify a singular goal or call-to-action that your organization is hoping to achieve with the support of user-centered training.
- Establish relationships with local universities that can contribute service evaluation and program support.
- Focus on evaluation methods that assess best practices for systems change, instead of relying exclusively on traditional methods of building scientific evidence, which can limit and exclude insightful findings.
- Commit to a team culture of understanding around how this new kind of partnership works (between a university, government agencies, and community).
- Be laser-focused on amplifying the voices of people who experience the system to learn whether the programs and services are doing what they intend to.

# Case Study: San Francisco Human Services Agency: Prototypes to Connect Newly-Sheltered Clients During COVID-19

## **Problem:**

In response to the COVID-19 pandemic, the City and County of San Francisco rapidly moved over 2000 people experiencing homelessness into City-contracted private hotels. These hotels, however, did not all have phones available for guest use, thereby limiting the ability to provide essential services to clients or for clients to connect with friends and family. Community partners, mental health experts from the Department of Public Health, and caseworkers brought the issue to the City's COVID Command Center.

## **Who was involved:**

- San Francisco Human Services Agency, Innovation Office (SFHSAIO), in collaboration with the San Francisco COVID Command Center, providing Service Design expertise
- San Francisco Department of Public Health, providing mental health and client expertise
- San Francisco IT team, who had previously also procured iPads supporting the housing operation

## **How human-centered prototyping helped:**

Prototyping is a design technique of creating an easy-to-release model, in order to validate expectations and iterate based on evolving new findings.

SFHSAIO used a user-centered, data-informed pilot prototyping process to design the best approach to successfully enroll people in phone services after they were removed from shelters to hotels for safety reasons in response to COVID-19.

Options included enrolling hotel guests onto the [LifeLine state program](#), a federal discounted phone service for qualifying low-income consumers.

Two pilots were created to explore the problem of getting recently housed hotel guests phone access:

- a. The first pilot focused on providing a Google Voice number on previously-distributed tablets.
- b. The second pilot aimed to learn from having a roving (on-the-ground) team enrolling clients in phone services at hotels.

**Success factors:**

Government agencies seeking to use the design technique of Prototyping to enroll homeless populations in phone services can benefit from these key learnings:

- Begin by gathering voices across impacted teams to gain a holistic understanding of the problem.
- Establish metrics, or key performance indicators (KPIs), to define success by clear realities, resources needed, cost of setup feasibility, and time to realize enrollment.
- Create strategic buy-in starting with on-the-ground staff, and then move to align with Community Partners, Site Leads, Site Managers and Clients/Guests.
- Map barriers to enrollment to identify different paths enrollees may experience, such as not having a required email address.
- Allow for extra time in troubleshooting with guests who do not have official documents available.
- Proactively vet third-party vendors who hand out phones and follow up to ensure successful delivery.
- Keep everyone's "eyes on the prize" and share in the excitement of success.

## Case Study: State of New Jersey Enables SNAP Document Upload Capacity<sup>73</sup>

**Problem:** SNAP benefits applicants must submit documents that verify their identity and income. In the state of New Jersey, eligibility workers typically saw these documents during in-person interviews, which were required pre-COVID-19. Under modified regulation due to the pandemic, viewing documents in person was no longer an option, yet increased SNAP demand made processing by mail a lengthy process. New Jersey needed a fast approach that let applicants upload document files, which could then be received and viewed securely by county eligibility workers.

**Who was involved:** New Jersey state government appointees and employees, including its Chief Innovation Officer, Chief Technology Officer, staff from the Office of Innovation, and leaders from the Department of Human Services, in partnership with volunteers from [U.S. Digital Response](#) (USDR), including a subject-matter expert, an engineer, a UX designer, and a product manager.

**How did they do it:** The New Jersey Chief Innovation officer reached out to USDR to explain the problem and learn if the group of technologist volunteers at USDR could stand up a short-term solution. USDR volunteers met with state stakeholders to understand their current data, platforms, and security needs, then quickly identified an approach using Cognito Forms, a free, online form tool. They stood up a prototype for a secure upload process in three days, using no custom code, at minimal cost, and integrating into tools New Jersey's Department of Human Services already had.

**Success factors:**

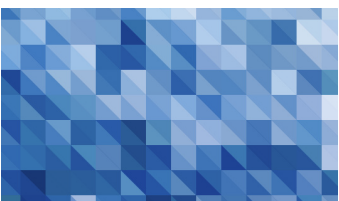
- A champion with technology and design background.
- Resources to support a robust Office of Innovation, a CIO, and a CTO.
- A government team with skills and expertise across multiple subject areas.
- Shared urgency, spanning government departments, to solve the problem.
- A government team willing to think outside the box despite constraints.
- Access to expert pro bono talent in partnership with USDR, with no consulting or development costs the state, and no procurement barriers.

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<sup>73</sup> "U.S. Digital Response Weekly Dispatch, Project Spotlight, Challenge: Simplify Online SNAP Application Processes," in press, U.S. Digital Response, <https://medium.com/u-s-digital-response>.

## Use Text and Voice Enrollment and Recertification Options

From February to May 2020, the SNAP program expanded 17% as more than six million people applied, the fastest growth over a three-month period in the program's history.<sup>74</sup> The health risks of COVID-19 and the resultant stay-at-home orders made in-person benefit application and recertification unfeasible, meaning agencies at all levels of government had to establish alternative ways to meet requirements while addressing the surge in benefit demand.



*“Frequently, clients only realize that they have lost their benefit when they try to use it.... These moments are accompanied by deep anxiety and financial insecurity. As one client put it, ‘Every six months, I basically start over.’”*

Recertification of benefit eligibility has been a longstanding pain point. Obstacles in the process lead to “churn,” which, in the context of benefit delivery, describes when people lose social safety net benefits even though they are still eligible, then are required to go through the often cumbersome process to rejoin. Typical reasons for churn are that benefit recipients may not know that recertification is needed or when it is required, or have difficulty submitting required reverification information or documents in time. Code for America’s Dustin Palmer wrote, “Frequently, clients only realize that they have lost their benefit when they try to use it.... These moments are accompanied by deep anxiety and financial insecurity. As one client put it, ‘Every six months, I basically start over.’”<sup>75</sup> The cost to states from the added time spent re-processing applicants by eligibility workers, document centers, and customer service call centers is also high. As many as one in five CalFresh applications originates from someone who had previously been enrolled in CalFresh in the last 90 days.<sup>76</sup> Missed documents overwhelmingly account for benefit cancellations<sup>77</sup> and are regarded as pain points in a customer’s eligibility and enrollment experience.<sup>78,79</sup>

<sup>74</sup> Deparle, J. (2020). [Amid a Deadly Virus and Crippled Economy, One Form of Aid Has Proved Reliable: Food Stamps](#), The New York Times.

<sup>75</sup> Palmer, D. (2020). [Cell Phones as a Safety Net Lifeline](#), Code for America.

<sup>76</sup> DeFrank, S. P. (2017). [E-Signatures for CalFresh Recertification: Reducing Churn with a PIN](#), Alliance to Transform CalFresh.

<sup>77</sup> Aron-Dine et al. (2020). [Larger, Longer-Lasting Increases in Federal Medicaid Funding Needed to Protect Coverage](#), Center on Budget and Policy Priorities.

<sup>78</sup> Khan and Ruskin. (2017). [Redesigning the journey to critical benefits for Americans in poverty](#), Medium.

<sup>79</sup> DeFrank, S. P. (2017). [SF- Marin Food Bank: Churn White Paper](#), Alliance to Transform CalFresh.

One of Code for America’s tenets in its [Blueprint for a Human-Centered Safety Net](#) is to offer “many welcoming doors” to benefit applicants and recipients, whether they are filling out their first application, renewing benefits, or reporting a change that may affect eligibility or allotment.<sup>80</sup> Similarly, experts at Benefits Data Trust advise, “There is no single solution; one approach may work well for one population but completely shut out another.”<sup>81</sup> Making multiple access points accessible and reducing churn, both during the pandemic and longer term, requires investment to adapt and scale human-centered design and data processing advancements. This section will review several new approaches that states have established.



*“There is no single solution; one approach may work well for one population but completely shut out another.”*

## Text-Based Approaches

In the United States, 95% of adults with incomes below \$30,000 own a cellphone or smartphone, making text messages a reliable way to reach people who may have trouble accessing home internet connections or personal computers.<sup>82</sup> Government agencies can use text messaging to make a full spectrum of benefits processes easier, including eligibility, enrollment, appointment reminders, reverification deadlines, and document transmission. Text-based approaches allow for user-centered, fast, and effective correspondence between benefit applicants and agencies, while mitigating the existing challenges of traditional in-person and paper applications. As a result, text-based applications and reminders reduce waiting times, churn, and cost.<sup>83</sup> Here are several examples of promising benefit enrollment assisters that rely on text messaging.

To address recertification churn for WIC, Medicaid, SNAP, and TANF, multiple state agencies in Louisiana worked with Code for America to launch [LA'MESSAGE](#), a text-based reminder service, from July 2018 to December 2019. LA'MESSAGE sent benefit recipients automated reminders about appointments and recertification tasks. It was built using commercial off-the-shelf tools (SimpleTexting and TextIt.In), Twilio, and a custom, open source Ruby on Rails application, maintained by a Code for America engineer, and hosted on Amazon Web Services.<sup>84</sup> Throughout the pilot, Code for America tested the effectiveness of different messages and integrated

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<sup>80</sup> Davis, E. et al. (Updated 2020). [Blueprint for a Human-Centered Safety Net](#), Code for America.

<sup>81</sup> Zygmunt, E. et al. (2020). Memo correspondence, Benefits Data Trust.

<sup>82</sup> (2019). [Demographics of Mobile Device Ownership and Adoption in the United States](#), Pew Research Center.

<sup>83</sup> Palmer, D. (2020). [Cell Phones as a Safety Net Lifeline](#), Code for America.

<sup>84</sup> (2019). [LA'MESSAGE Pilot: Text Reminders in Louisiana](#), Code for America.

feedback from users, with the goal of being responsive to “daily realities of the Louisianians we serve.”

By the end of the pilot period, over 108,000 Louisianans were invited to opt in to LA'MESSAGE for one or more benefits. One of the key components that allowed them to reach that number of people was that Louisiana had sought, and in 2016 received, approval from the Centers for Medicare and Medicaid Services (CMS) to implement Fast Track data sharing between Medicaid and SNAP programs.<sup>85</sup> Evaluation data show that LA'MESSAGE was highly effective in reducing churn during its pilot, increasing successful WIC renewals from 29% to 52%, SNAP renewals from 51% to 70%, and Medicaid renewals from 15% to 25%.<sup>86</sup> During COVID-19, the state of Louisiana expanded LA'MESSAGE to its full SNAP caseload.<sup>87</sup>

LA'MESSAGE is currently a one-way texting system, capable of sending texts from state agencies to benefit recipients. It can also receive replies from recipients that trigger automated responses from the app (a text supplying the phone number of a county agency, for example). Comparably, a [two-way texting system](#) was piloted in a collaboration between the Michigan Department of Health and Human Services, Code for America, and Civilla in 2018.<sup>88</sup> Though significantly smaller in scale than LA'MESSAGE, the two-way texting pilot introduced the ability for people to text photos of their documents to caseworkers, after the caseworker provided personalized information over text. This communication line made document submission more effective because it let caseworkers offer specific guidance to individual residents, let people respond asynchronously, and allowed for much faster feedback when documents were incorrect or incomplete. Like LA'MESSAGE, the two-way pilot was created using a commercial off-the-shelf tool (Zendesk)<sup>89</sup>

The Chicago-based nonprofit [mRelief](#) has implemented one-way text-based eligibility assisters nationwide. People can respond to 10 questions over text to learn if they are likely to be eligible for SNAP benefits.<sup>90</sup> mRelief has also partnered with select local and state officials to offer text-based enrollment services,<sup>91</sup> and in 2020, launched a CRM named for the 20th-century welfare activist, Johnnie Tillman.<sup>92</sup> Catholic Charities caseworkers in Chicago are using the “Johnnie” CRM to schedule

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<sup>85</sup> (2016). [Healthy Louisiana: Louisiana Receives Approval for Unique Strategy to Enroll SNAP Beneficiaries in Expanded Medicaid Coverage](#), Louisiana Department of Health.

<sup>86</sup> Ibid.

<sup>87</sup> Palmer, D. (2020). [How Louisiana Rapidly Scaled Pilot Solutions to Combat COVID-19](#), Code for America.

<sup>88</sup> (2019). [Streamlining Access to Public Benefits in Michigan](#), Civilla and Code for America.

<sup>89</sup> Ibid.

<sup>90</sup> Free, C. (2020). [The pandemic has left millions hungry. This group helps people get food benefits fast, by text.](#), Washington Post.

<sup>91</sup> (2018). [mRelief launches end-to-end SMS application in California](#), mRelief.

<sup>92</sup> Meyn, Z. and Hacioglu, D. (2020). [Introducing Johnnie: mRelief's CRM](#), mRelief.

text messages and call people who are likely to be eligible for SNAP to help them submit an application.<sup>93</sup>

Government agencies and volunteer groups have also developed text-based benefit assisters. In 2014, Code for Anchorage, a [Code for America Brigade](#), launched a text message platform called “Balance” that lets Alaskan SNAP recipients check current funds in their SNAP accounts.<sup>94</sup> One leader of Code for Anchorage, Brendan Babb, later became the municipality’s Chief Innovation Officer and director of its [Bloomberg Philanthropies-funded innovation team](#). The Anchorage i-team partnered with the Food Bank of Alaska to build and implement a SNAP Help Textbot, which guides people through SNAP enrollment, recertification, or case status checks.<sup>95</sup>

### Resources from Experts in the Field

- [LA'MESSAGE Pilot: Text Reminders in Louisiana](#) (2019). Produced by Code for America.
- [Streamlining Access to Public Benefits in Michigan](#) (2019). Produced by Civilla and Code for America.
- [Integrated Benefits Initiative: Best Practices in Texting](#) (2020). Produced by Code for America.
- [Leveraging Text Messaging to Improve Communications in Safety Net Programs](#) (2020). Produced by Center on Budget and Policy Priorities.
- [Use Text Messaging to Reach People During Social Distancing](#) (2020). Produced by Alluma, Civilla, Code for America, mRelief, and One Degree, writing as the [Social Tech Collaborative](#).

### Recommendations and Opportunities to Scale

- Learning from the experiences of Michigan, Louisiana, Illinois, and others, state agencies should consider piloting and permanently implementing text-based benefit eligibility assessment, enrollment, document uploads, recertification, and/or appointment reminders. Code for America’s [final report about the LA'MESSAGE pilot](#) offers detailed recommendations.

<sup>93</sup> Meyn, Z. (2020). [Johnnie in the Field](#), mRelief.

<sup>94</sup> Emple, H. (2015). [Cool to be Kind: Coding to Combat Poverty](#), New America Weekly.

<sup>95</sup> Paynter, B. (2019). [This New Program Lets People Text to Access Government Food Aid](#), Fast Company.




- States that apply for and are granted [Fast Track](#) and [Express Lane Eligibility](#) from CMS may have greater access to beneficiary data. [As was the case in Louisiana](#), this may allow for expanded reach of text-based services. Benefits Data Trust offers [this guide to Fast Track](#).

## Voice-Based Applications

Voice-based applications, which rely on the use of a landline or cellular phone, remove the requirements for applicants to use the internet, mail documents, visit a physical location, or speak with someone face to face. These requirements can be significant obstacles to application. Postal mail can be slower and less reliable, and mobile application technology is not yet fully available and often requires data or internet access. Office visits can be challenging for people who cannot take time off from work, those who live in rural areas, people with transportation issues, and now, people complying with COVID-19 social distancing and stay-at-home orders.

Voice-based applications, including telephonic applications and applications supported by interactive voice response (IVR) technology, assist applicants who are newly eligible and also those who have previously received benefits and need to recertify. A [2014 study](#) in Alabama, Maryland, and Michigan found that nearly as many low-income people want assistance by telephone as in person, and almost twice as many want help over the phone compared to those who want help online.<sup>96</sup>



*It is important to prioritize voice-based delivery solutions for people who do not have internet access.*

Our research has noticed a common push for internet-based applications. Although all states have online applications for Medicaid, and 46 states have online applications for SNAP, it is important to prioritize voice-based delivery solutions for people who do not have internet access. According to the [Digital Divide report](#) from the Public Policy Institute of California, only about 55% of Californians with incomes below \$40,000 per year have broadband internet access.<sup>97</sup>

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<sup>96</sup> Cahill, R. M. (2013). [Telephonic Signatures: An Essential Tool for Enrollment](#), American Bar Association.

<sup>97</sup> Justin Goss et al. (2019). [California's Digital Divide](#), Public Policy Institute of California.

## Resources from Experts in the Field

- [Improving Customer Service in Health and Human Services Through Technology](#) (2018). Produced by the Center on Budget and Policy Priorities.

## Recommendations and Opportunities to Scale

- Organizations capable of delivering technology innovation, such as Benefits Data Trust, Nava, Code for America (CFA) and Alluma, or government call center operations transformations, such as [Change & Innovation Agency's role in transforming Nevada Department of Health and Human Services](#), can bring voice-based applications to scale.
- For states new to telephonic applications, employee-centered design exercises about anticipated issues like handling volume, establishing a connection to mission with employees, and setting up supportive activities such as call center self-care to reduce burnout, can help establish effective service delivery. States that currently offer telephonic applications and organizations experienced in supporting them, such as [Benefits Data Trust](#), can offer technical assistance with design exercises.

## Telephonic Signatures

Telephonic signatures offer a voice-based approach to benefit enrollment and recertification. A telephonic signature uses an individual's recorded verbal assent in place of an inked signature, saving application processing time, decreasing in-office administration, and simplifying the recertification process.<sup>98</sup>

In 2016, the California Department of Social Services, in partnership with the [Alliance to Transform CalFresh \(ATC\)](#), introduced [an initiative](#) to bring telephonic signatures to every county in California. They worked to understand process barriers to using telephonic signatures for CalFresh and CalWORKs (SNAP and Medicaid in CA), and developed recommendations for counties, the County Welfare Directors Association of California (CWDA), California Department of Social Services (CDSS), USDA/FNS, and ATC.

Though the telephonic signature process relies heavily on having the right technology, knowing how to integrate that technology into a county's eligibility system is key. Proper integration also allows for saving telephonic signature

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<sup>98</sup> (2019). [Best Practices for SNAP Telephonic Signatures](#), Food Research & Action Center.

recordings to case files (or some other retrievable location),<sup>99</sup> and, if necessary, the secure transmission of recorded signatures between community and county agencies.

In March 2020, the Families First Coronavirus Response Act (FFCRA) allowed the U.S. Food and Nutrition Service to create two temporary waivers for states that allow more options to use telephonic signatures.<sup>100</sup> One allows assister organizations — community-based organizations or other service providers that have been approved by their state to be an alternative benefit access point — to note a telephonic signature in a case file without needing a recording.<sup>101</sup> The second allows assister organizations to act as applicants' authorized representatives. The ability to act as an authorized representative has three advantages: it offers personalized help to people who may have difficulty with the application process, reduces exposure risk during the pandemic by limiting the need to mail documents, and reduces the aggregate administrative burden by having assisters submit more applications online or over the phone, reducing paper applications.<sup>102</sup> The USDA has said it may limit future approval of these and other waivers and extensions while future pandemic relief legislation remains under debate.<sup>103</sup>

Assister organizations offer the advantage of tailored benefit outreach and application assistance to people and specific populations, such as senior citizens. Assister organizations can be authorized by their state to collect SNAP applications over the phone; however, getting that approval typically requires the assister organization complies with a federal regulation to store recorded telephonic signatures. This requirement may pose resource and technical challenges even in non-pandemic times, and is very difficult to meet when employees of assister organizations need to work from home during the pandemic.<sup>104</sup>

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<sup>99</sup> The USDA already requires that states administering SNAP and using telephonic signatures save those recordings, though this requirement was temporarily waived under the Families First Coronavirus Response Act to allow for faster processing of a high volume of applications.

<sup>100</sup> States must be individually approved by the Food and Nutrition Service to receive a waiver. Not all states opt to undergo the process to adopt waivers.

<sup>101</sup> Wagner, J. (2020). [States Can Make Applications More Accessible During COVID-19 Crisis](#), Center on Budget and Policy Priorities.

<sup>102</sup> (2020). [Facilitating Remote Application Assistance for SNAP During COVID-19: Recommendations for States and Application Assistors](#), Benefits Data Trust.

<sup>103</sup> (2020). [States Are Using Much-Needed Temporary Flexibility in SNAP to Respond to COVID-19 Challenges](#), Center on Budget and Policy Priorities.

<sup>104</sup> Wagner, J. (2020). [States Can Make Applications More Accessible During COVID-19 Crisis](#), Center on Budget and Policy Priorities.

## Resources from Experts in the Field

- [\*Facilitating Remote Application Assistance for SNAP During COVID-19: Recommendations for States and Application Assisters\*](#) (2020). Produced by Benefits Data Trust.
- [\*Telephonic Signatures: An Essential Tool for Enrollment\*](#) (2013). Produced by Benefits Data Trust.
- [\*Improving Customer Service in Health and Human Services Through Technology\*](#) (2018). Produced by the Center on Budget and Policy Priorities.
- [\*States Can Make Applications More Accessible During COVID-19 Crisis\*](#) (2020). Produced by the Center on Budget and Policy Priorities.
- [\*U.S. Hunger Solutions: Best Practices for SNAP Telephonic Signatures\*](#) (2019). Produced by the Food Research and Action Center (FRAC).

## Recommendations and Opportunities to Scale

- While allowed by the Families First Coronavirus Response Act or future COVID-19 response legislation, states can apply for waivers allowing application assister organizations to receive telephonic signatures for SNAP applications without the need to store the audio recording, and to act as authorized representatives for people seeking SNAP benefits. Obtaining and implementing these waivers can help more people receive benefits while protecting public health. Benefits Data Trust is one organization [that can offer technical assistance](#) in this process and related options.<sup>105</sup>
- [The telephonic signature initiative undertaken by California's Department of Social Services](#) is a good example for other states that are considering adoption of this technology.

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<sup>105</sup> (2020). [Facilitating Remote Application Assistance for SNAP During COVID-19: Recommendations for States and Application Assisters](#), Benefits Data Trust.

# View Social Safety Net Benefit Policy and Delivery through the Lens of Racial Justice

The Black Lives Matter movement is radically changing the understanding of structural racism in the United States' policies and institutions. As one of our nation's most prominent government systems, the social safety net must be examined in this context.

The U.S. government passed the Social Security Act of 1935 to provide an early safety net for elderly, unemployed, and disadvantaged Americans.<sup>106</sup> Yet, lawmakers codified the first formal safety net with racism; unemployment insurance was a key component of that law, but agricultural workers and household servants – largely Black workers – were ineligible, leaving 65% of Black American workers without access to unemployment insurance, compared to 27% of white workers.<sup>107</sup> Racist sentiments have echoed throughout the years of discussion around social safety net policy. In 1976, Ronald Reagan leveraged the “welfare queen” narrative in his presidential campaign,<sup>108</sup> further fueling racial animosity towards Black Americans and unfairly associated them with fraudulent use of the safety net.<sup>109</sup> These false narratives have had a longstanding impact on public perception of public benefit recipients of all races, and Black recipients in particular, and perpetuate stigma associated with receiving benefits.<sup>110,111</sup> They affect politicians' stances on program eligibility and budgets, and encourage benefit systems designed to prevent fraud at the cost of open and effective benefit enrollment and delivery.<sup>112,113</sup>

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<sup>106</sup> [The Social Security Act of 1935](#), Legislative History, Social Security Administration.

<sup>107</sup> Rodems, R. and Shaefer, H. L. (2016). [Left Out: Policy Diffusion and the Exclusion of Black Workers from Unemployment Insurance](#), Social Science History, Vol. 40, 3, pp. 385-404.

<sup>108</sup> (1976). [‘Welfare Queen’ Becomes Issue in Reagan Campaign](#), New York Times.

<sup>109</sup> Bernstein, J. (2018). [After All These Years Welfare Reform is the Same Racist Dog Whistle It Always Was](#), Washington Post.

<sup>110</sup> Ibid.

<sup>111</sup> Alani, A. and Sprague, A. (2017). [On the Myths of Waste, Fraud, and Abuse](#), New America Weekly.

<sup>112</sup> Ibid.

<sup>113</sup> Lockhart, P.R. (2018). [Republicans Say Race Isn't a Factor in the Food Stamp Debate. Research Suggests Otherwise](#), Vox.



This timeline was created by Student Analyst Angela Guo. [Explore the full interactive timeline.](#)

The next recommendations in this report spotlight several technologies that negatively influence social safety net benefit access. Our intention is to highlight issues that should be resolved to allow for an equitable and inclusive user experience, no matter if they resulted from outdated or non-human centered design, implicit or explicit bias, or a combination. These and other “compounding inequities,” as our colleagues at New America write in [their recent report](#), may explain why white workers received unemployment insurance during the COVID-19 pandemic at a disproportionately higher rate than Black and Latinx workers.<sup>114</sup>

## Use Alternatives to Remote Identity Proofing

Remote identity proofing (RIDP) is a process used to verify a person’s identity online before granting them access to sensitive information, such as credit reports and medical histories. In RIDP, people are asked a series of questions using data collected about them by credit bureaus, involving loans, mortgages, current and past home addresses, and other pieces of sensitive information. In many cases when state benefit applications include RIDP, it is not required by federal regulation.<sup>115</sup> In fact, RIDP can be a significant barrier to people with limited credit or banking histories, or who can’t easily access their personal records, leading some people who are eligible for benefits unable to complete applications and mistakenly believe they can’t receive them.<sup>116</sup>

<sup>114</sup> Fields-White, M. et al. (2020). [Unpacking Inequities in Unemployment Insurance](#), New America Public Interest Technology New Practice Lab.

<sup>115</sup> Wagner, J. and Gaudet, G. (2020). [Removing Barriers to Access From Remote Identity Proofing](#), Center on Budget and Policy Priorities.

<sup>116</sup> Ibid.

The [Center on Budget and Policy Priorities](#) and [Nava](#) recommend that states remove requirements for RIDP in benefits applications in favor of more accessible security checks. These could involve asking applicants to provide a piece of personal data they have, and offering options, such as an application number, card number, or case number, or asking for identifiers from other datasets like the Department of Motor Vehicles.<sup>117</sup>

In 2019, the U.S. Government Accountability Office reported that selected government agencies are now using a variety of identity matching techniques that do not rely on individuals' knowledge about their credit.<sup>118</sup> These techniques include the verification of mobile device possession through push notifications or confirmation codes. Not only are these techniques more resistant to data theft, but they are more accessible because people are more likely to have access to a telephone number or mobile phone than information relating to their credit history.

### Resources from Experts in the Field

- [Removing Barriers to Access From Remote Identity Proofing](#) (2020). Produced by the Center on Budget and Policy Priorities and Nava.
- [Identity Authentication Pilot Projects - Conversion to State Option](#) (2019). Produced by Lizbeth Silbermann, Director of the Program Development Division of SNAP at the USDA.
- [Facilitating Remote Application Assistance for SNAP During COVID-19: Recommendations for States and Application Assistors](#) (2020). Produced by Benefits Data Trust.

### Recommendations and Opportunities to Scale

- State agencies should re-examine whether RIDP is necessary in their benefit applications and replace RIDP with security measures that don't create barriers for applicants. Applicants could be offered options of types of personal data to provide, such as a case number, or for an identifier from other datasets like the Department of Motor Vehicles. The resources above provide helpful guidance.
- States should remove RIDP in SNAP applications, and in combined benefit applications that include SNAP. SNAP applications already undergo verification through a separate process, and requiring RIDP in them goes against Food and Nutrition Service (USDA) regulation. For more information, see the guidance in the resources above [USDA](#) and [Benefits Data Trust](#).

<sup>117</sup> Ibid.

<sup>118</sup> (2019). [Data Protection: Federal Agencies Need to Strengthen Online Identity Verification Processes](#), United States Government Accountability Office Report to Congressional Requesters, GAO-19-288.

## Remove Barriers Caused by EBT Authorization Requirements

Online grocery purchasing and delivery became essential to many during the COVID-19 pandemic. For SNAP and WIC recipients, however, PIN-based authorization requirements tied to their benefits' EBT cards caused significant barriers to home grocery delivery options. Prior to COVID-19, nearly all SNAP and WIC recipients were required to make EBT purchases in-store only. Approximately 34% of SNAP recipients do not own a car,<sup>119</sup> and recipients often borrow cars from neighbors or friends, walk, bike, or use public transportation to complete their grocery shopping. These limitations meant that many low-income individuals and families had a higher risk of exposure to COVID-19 due to their inability to stay at home to buy food during the pandemic. Benefits that could only be used outside the home jeopardized the social safety net's ability to keep people economically afloat through a sudden and prolonged financial crisis, and public health's aim to protect people during a global health pandemic.



*Benefits that can only be used outside the home jeopardize the social safety net's ability to keep people economically afloat.*

Food security and racial justice advocates responded to pandemic conditions by demanding the USDA expand a 2019 pilot program for online SNAP purchases and delivery.<sup>120,121</sup> As of September 2020, the program is active in nearly every state but the only retailers that meet the Food and Nutrition Service's (FNS) existing technical requirements for this pilot<sup>122</sup> in most participating states are Amazon and Walmart.<sup>123</sup> The current situation constrains food access and choice for SNAP recipients inequitably.

A separate USDA pilot with online retailer FreshDirect offered online SNAP grocery sales and delivery to two Bronx zip codes,<sup>124</sup> and as of September 2020, three more local grocery chains now meet FNS requirements for online SNAP purchases and delivery.<sup>125</sup> Most retailers are having challenges integrating online sales platforms

<sup>119</sup> (2020). [SNAP Use for Online Food Purchases: A Pilot Program](#), Hunter College New York Food Policy Center.

<sup>120</sup> Rasul, N. (2020). [What More States Allowing SNAP Recipients to Buy Food Online Means for Food Security](#), Civil Eats.

<sup>121</sup> (2020). [Safeway, Black SNAP Benefit Recipients Deserve the Ability to Shop Online for Groceries](#), Color of Change.

<sup>122</sup> (2020). [Retailer Requirements to Provide Online Purchasing to SNAP Households](#), Food and Nutrition Service, USDA.

<sup>123</sup> (2020). [FNS Launches the Online Purchasing Pilot](#), Food and Nutrition Service, USDA.

<sup>124</sup> (2020). [Details about the FreshDirect EBT Pilot Program](#), FreshDirect.

<sup>125</sup> (2020). [FNS Launches the Online Purchasing Pilot](#), Food and Nutrition Service, USDA.



with existing, state-procured EBT processor technologies. Just two EBT vendors serve 48 states. In [a report](#) from the Urban Institute about the technological future of SNAP delivery, experts interviewed say existing procurement practices hamper states' ability to buy EBT processing services that can respond more quickly and effectively to the needs of the current market.<sup>126</sup> Another challenge to technological responsiveness is that SNAP EBT policy changes (including pilot program approval) can only happen through the Farm Bill, which is legislated once every five years (approximately). Attempts to change SNAP processes through regulation change can sometimes take as long.<sup>127</sup>

Data privacy, racial justice, and public health experts have raised additional concerns about the current pilot for online grocery purchasing. They recommend the USDA establish a policy framework that safeguards SNAP recipients' data, with their primary concerns about the current pilot requirements being the lack of meaningful privacy rights for SNAP recipients and the risk of discriminatory marketing practices that may lead to economic and health harms.<sup>128</sup>

### Resources from Experts in the Field

- [Access for All: Innovation for Equitable SNAP Delivery](#) (2020). Produced by the Urban Institute.
- [Does Buying Groceries Online Put SNAP Participants at Risk? How to Protect Health, Privacy, and Equity](#) (2020). Produced by the Center for Digital Democracy.

### Recommendations and Opportunities to Scale

- While developing [the report](#) discussed above, researchers at the Urban Institute heard repeated recommendations to improve the RFP process for procuring an EBT vendor. These include having FNS approve EBT vendors centrally instead of having each state undergo its own bidding process, creating RFP selection criteria that consider vendors' experience processing financial transactions outside SNAP EBT, and including contemporary design, technological, and data standards in the RFP to receive higher overall levels of service and innovation.
- To uphold the principles of equity and inclusion, SNAP recipients should be able to buy groceries using the same technological advances available to the general public, while also maintaining the option to buy groceries using current purchasing methods. Similarly, changes in the way retailers accept

<sup>126</sup> Hahn, H, et al. (2020). [Access for All: Innovation for Equitable SNAP Delivery](#), Urban Institute.

<sup>127</sup> Ibid.

<sup>128</sup> Chester, J. et al. (2020). [Does Buying Groceries Online Put SNAP Participants at Risk? How to Protect Health, Privacy, and Equity](#), Center for Digital Democracy.

SNAP benefits should be developed so all retailers can implement them at minimal cost. In all cases, the technology should be designed using a human-centered approach and considering the different life circumstances of its users. These principles are outlined in the same [Urban Institute report](#) mentioned above.

- The USDA should revisit data privacy protections for SNAP recipients when developing its regulations for the next iteration of SNAP online grocery purchasing. The [Center for Digital Democracy report cited above](#) recommends that the USDA work with SNAP recipients, state officials, trade groups, and experts from the consumer protection, civil rights, public health, and food security communities to inform policy and practice.

## Design Better Approaches for Delivering Cash Assistance

In June 2020, 40.4 million American workers reported they'd lost their job or had to reduce their hours due to the pandemic.<sup>129</sup> Many now rely on unemployment benefits, stimulus payments, and other tax credits (like the Earned Income Tax Credit and Child Tax Credit) to sustain themselves and their families. While state unemployment agencies and the IRS have pushed their limits to deliver cash benefits under pandemic conditions, there remain capacity and delivery issues that keep funds from reaching millions of Americans, particularly those with very low incomes to begin with. This section will briefly review some of these gaps and highlight ways technology, data, and design could remedy them.

Analysts wrote that the rollout of Economic Impact Payments (EIPs, or stimulus payments) in Spring 2020 succeeded in many ways – the IRS sent EIPs to 159 million people between April 10 and June 2, 2020, which is considered fast in comparison to similar stimulus payments in the previous decade, despite pandemic-related closures of IRS service centers, the concurrent 2020 tax season, and earlier IRS resource cutbacks.<sup>130,131</sup> However, an estimated 12 million Americans remained without their full EIP.<sup>132</sup> They were disproportionately adults with income at or below the Federal Poverty Level, and disproportionately people of color (68.6% Black adults

<sup>129</sup> (2020). [Labor Force Statistics from the Current Population Survey: Supplemental Data Measuring the Effects of the Coronavirus \(COVID-19\) Pandemic on the Labor Market](#), U.S. Bureau of Labor Statistics.

<sup>130</sup> Hotzblatt, J and Karpman, M. (2020). [Who Did Not Get the Economic Impact Payments by Mid-to-Late May, and Why? Findings from the May 14-27 Coronavirus Tracking Survey](#), Urban Institute.

<sup>131</sup> Zucker, G. et al. (2020). [CARES Act Stimulus Payments Have Reached 160 Million Households - But Could Reach Millions More](#), New America.

<sup>132</sup> Marr, C. et al. [Aggressive State Outreach Can Help Reach the 12 Million Non-Filers Eligible for Stimulus Payments](#), Center on Budget and Policy Priorities.

and 54.1% Hispanic adults surveyed in mid-May had received their EIP, compared to 73.7% of white adults).<sup>133</sup>

Many people with low incomes are not required to file taxes, so early in the EIP issuance process, the IRS stood up an online “[Non-Filers Tool](#)” to collect information from this group in order to send them the EIP as a check or prepaid debit card. Multiple challenges remained, like information gaps (informing people that they needed to submit their information online) and access gaps (many people with low incomes do not have internet access, and the tool is not optimized for mobile devices).<sup>134</sup> People who are unbanked – again, disproportionately people with low incomes and people of color<sup>135</sup> – could not receive their EIP as an automatic deposit even if they had filed a 2018 or 2019 tax return and had to wait until the IRS could mail it.<sup>136</sup>

The [Urban Institute](#), [New America](#), [Center on Budget and Policy Priorities](#), and [Code for America](#) (working with the IRS’ [Volunteer Income Tax Assistance, or VITA](#), program) all put forward numerous, detailed recommendations to mediate these challenges now and in future crises. Several top-line recommendations from these sources include:

- Leverage SNAP and Medicaid eligibility records to connect with people with low incomes who may not file taxes, informing them they can sign up to receive Economic Impact Payments (EIPs), and for those who qualify, Earned Income Tax Credits (EITCs) and Child Tax Credits (CTCs).<sup>137,138</sup>
- Automate payments whenever possible using available W2 and 1099 data and filters that follow the policy and regulatory rules for tax credits.<sup>139</sup>
- Update federal and state data disclosure laws and establish uniform eligibility rules to allow for data-sharing between the IRS and state agencies.<sup>140</sup>

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<sup>133</sup> Hotzblatt, J and Karpman, M. (2020). [Who Did Not Get the Economic Impact Payments by Mid-to-Late May, and Why? Findings from the May 14-27 Coronavirus Tracking Survey](#), Urban Institute.

<sup>134</sup> Ibid.

<sup>135</sup> (2019). [Report on the Economic Well-Being of U.S. Households in 2018](#), Board of Governors of the Federal Reserve System.

<sup>136</sup> Hotzblatt, J and Karpman, M. (2020). [Who Did Not Get the Economic Impact Payments by Mid-to-Late May, and Why? Findings from the May 14-27 Coronavirus Tracking Survey](#), Urban Institute.

<sup>137</sup> Ibid.

<sup>138</sup> Marr, C. et al. [Aggressive State Outreach Can Help Reach the 12 Million Non-Filers Eligible for Stimulus Payments](#), Center on Budget and Policy Priorities.

<sup>139</sup> Zucker, G. et al. (2020). [CARES Act Stimulus Payments Have Reached 160 Million Households - But Could Reach Millions More](#), New America.

<sup>140</sup> Hotzblatt, J and Karpman, M. (2020). [Who Did Not Get the Economic Impact Payments by Mid-to-Late May, and Why? Findings from the May 14-27 Coronavirus Tracking Survey](#), Urban Institute.

- Create and scale human-centered, mobile-first application assisters for tax credits, like Code for America’s [GetYourRefund application assister](#) for the EITC.<sup>141</sup>

### Resources from Experts in the Field

- [Who Did Not Get the Economic Impact Payments by Mid-to-Late May, and Why? Findings from the May 14-27 Coronavirus Tracking Survey](#) (2020). Produced by the Urban Institute.
- [CARES Act Stimulus Payments Have Reached 160 Million Households — But Could Reach Millions More](#) (2020). Produced by New America.
- [Unpacking Inequities in Unemployment Insurance](#) (2020). Produced by New America.
- [Resources to Support State Outreach to Non-Filers Eligible for Stimulus Payments](#) (2020). Produced by Center on Budget and Policy Priorities.
- [Meeting the Need For Flexible Cash During a Pandemic](#) (2020). Produced by Code for America.

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<sup>141</sup> Grimm, A. (2020). [Filing Taxes for Economic Justice](#), Code for America.

# Conclusion

Reports like this are only as useful as they are actionable. In late 2020, the Beeck Center will work alongside the government agencies, nonprofits, and public benefit corporations mentioned in this report to scale these and similar recommendations in more places in the United States. We also want these recommendations to inform the decisions of policymakers, government executives, and philanthropic organizations, especially given the likely passage of new stimulus legislation after the 2020 general election. This is an opportunity for a large federal investment to improve the social safety net with design, data, and technology, and the chance to learn from the people who have been working in this field for a decade and apply their hard-earned insights.<sup>142</sup>

There is no shortage of technology, data, and design-enabled approaches being tested in this time of increased demand and system stress. We will periodically revise this living document to update these recommendations with new work from the organizations and government agencies in this field.

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<sup>142</sup> (2020). [Software Update Required: COVID-19 Exposes Need for Federal Investments in Technology](#), United States House Committee on the Budget.

## About the Authors

[Chad Smith](#) and [Sara Soka](#) are Fellows-in-Residence at the Beeck Center for Social Impact + Innovation researching how technology, data, and design are being used to simplify social safety net benefit enrollment and delivery.

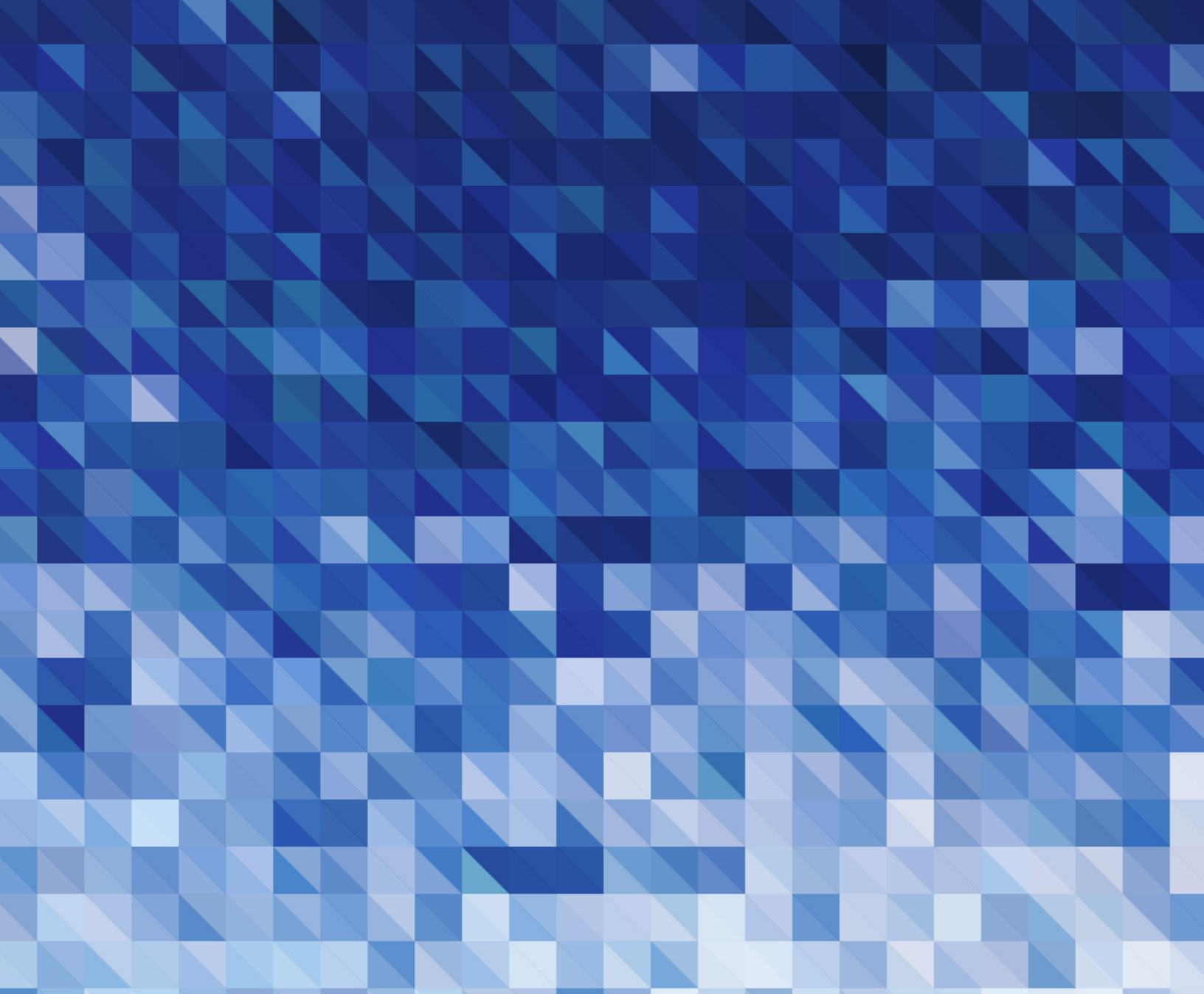
Chad researches the operational, technological, and ethical practices of integrating continuous client data into programs offered by Social Services Departments and Providers. He is the founder of YourSeat, a data platform for collecting, measuring and reporting behavior change in Family First Prevention Services Act (FFPSA) programs. Prior to YourSeat, Chad led Human Centered Design engagements for Accenture's Public, Healthcare, Telecommunication, and Financial Services clients undergoing internal system modernization efforts.

Sara is an advocate for human-centered policy, implementation, and service design. Sara has a background in applied qualitative research and network leadership spanning public health issues, plus substantial experience in community engagement and strategic communication. She managed Berkeley, California's successful soda tax campaign, the first to pass in the US, with resident-led policymaking, locally resonant messaging, and participatory budgeting as guiding principles. As a consultant and a Vice President of Policy for a national public health nonprofit, she monitored iterations of this policy and its implementation, the related impacts, and implications for equity.

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