

A Report of the
NATIONAL ACADEMY OF PUBLIC ADMINISTRATION
CENTER FOR INTERGOVERNMENTAL PARTNERSHIPS

Modernizing Public Benefits Delivery



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June 2023

A Report of the

**NATIONAL ACADEMY OF PUBLIC
ADMINISTRATION**

CENTER FOR INTERGOVERNMENTAL PARTNERSHIPS

**Modernizing Public Benefits Delivery:
How Innovation Can Deliver Results for
Eligible Households and Taxpayers**



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About the Academy

The National Academy of Public Administration (the Academy) is an independent, nonprofit, and non-partisan organization established in 1967 and chartered by Congress in 1984. It provides expert advice to government leaders in building more effective, efficient, accountable, and transparent organizations. To carry out this mission, the Academy draws on the knowledge and experience of its approximately 1,000 Fellows—including former cabinet officers, Members of Congress, governors, mayors, and state legislators, as well as prominent scholars, career public administrators, and nonprofit and business executives. The Academy helps public institutions address their most critical governance and management challenges through in-depth studies and analyses, advisory services and technical assistance, congressional testimony, forums and conferences, and online stakeholder engagement. Learn more about the Academy and its work at www.NAPAwash.org.

About the Center for Intergovernmental Partnerships

The Academy established the Center for Intergovernmental Partnerships (the Center) in September 2021 in recognition that no significant public problem fits entirely within one government agency or even one level of government. The Center helps identify intergovernmental gaps and serves as a forum for dialogue and problem-solving on those issues across local, state, tribal, territorial, and federal levels of government. Through convenings, collaboration, and research, the Center will be a hub for solutions to our society's biggest intergovernmental challenges. It will bring leaders from every level of government and relevant sectors together to design solutions that create new governance models for the 21st century.



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FOREWORD

The United States experienced a massive disruption beginning in 2020 with the COVID-19 pandemic that forced government agencies at all levels to rethink their basic service delivery models. More people urgently needed more services, and centralized, in-person operations were out of the question. The inertia of "business as usual" was broken.

The Biden administration has made customer experience a priority. [Executive Order 14058](#) directed federal agencies to improve the experience of engaging with the government for services and support, primarily through "modernizing programs, reducing administrative burdens, and piloting new online tools and technologies that can provide a simple, seamless, and secure customer experience." For many Americans, social services are the primary point of contact with the government, and Federal agencies must work with state and local agencies to improve this customer experience.

With the support of the Center for Accountability, Management, and Innovation (CAMI), the National Academy of Public Administration's Center for Intergovernmental Partnerships (CIP) hosted a series of convenings in 2022 to examine the delivery model for public benefits. The meetings brought together researchers, advocates, practitioners, technologists, and public sector associations to develop a vision for a modernized public benefits system and recommend strategies to eliminate obstacles hindering innovation and optimization. This white paper captures this group's vision of a modernized public benefits system that decenters compliance-based administrative functions and recenters a holistic customer-centric experience—emphasizing efficiency, efficacy, and expediency. It provides a roadmap for policy makers to begin the process of transformation.

Teresa W. Gerton
President and Chief Executive Officer
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The Academy thanks the subject-matter experts in many organizations who talked to the Center for Intergovernmental Partnerships team about the challenges of today's public benefits systems, efforts to bring about change, and the potential for modernization.

A series of meetings in 2022 brought together researchers, advocates, practitioners, technologists, and public sector associations to develop a vision for a modernized public benefits system and recommend strategies to eliminate obstacles hindering innovation and optimization. The final version of this paper represents a consensus view of participants, but it may not reflect the opinions, beliefs, or positions of individual participants or their organizations.

Several participants volunteered additional time to review the draft. They provided many constructive comments and suggestions, but they were not asked to endorse the conclusions or recommendations of this report.

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EXECUTIVE SUMMARY

Today's benefits programs provide critical assistance to millions of people; modernizing and opening the door to real innovation and new strategic models would make delivering those benefits far more effective. The pandemic disrupted many government systems, forcing agencies at all levels to find different ways of providing services. In public benefits programs, temporary rules and procedure changes demonstrated that change is possible. With the end of the public health emergency and an executive branch emphasis on improving the customer experience, the door to transformation has opened; now is the time to push through it.

A modernized public benefits system would better serve program participants, administrators, policy makers, and taxpayers. This paper proposes a set of principles both define the desired future state and outline the values that shape decision making along the way. Practices describe the processes needed to achieve modernization.

Figure 1. Modernization Principles, Practice, and Strategies

Principles	
◆ Adapt quickly to meet current and changing needs	◆ Increase accessibility
◆ Improve efficiency	◆ Enhance accountability
	◆ Close the equity gap

Practices	
◆ Get the right benefits to the right people promptly	◆ Reduce compliance risk and improve program agility
◆ Build clients' capacities and improves outcomes	◆ Support innovation
◆ Steward taxpayer dollars and addresses a public need cost-effectively	◆ Enable continuous improvement
	◆ Promote equity
	◆ Build trust across all levels of government

Strategies
⇒ The client enrollment experience is simplified
⇒ Programs are cost-effective and efficient
⇒ Data and stakeholder input improve program performance
⇒ State and local governments can innovate and are given incentives to do so
⇒ States have adequate resources to innovate

INTRODUCTION

The Pandemic Strained and Disrupted the Public Benefits System

The United States experienced massive disruptions associated with the COVID-19 pandemic, forcing government agencies at all levels to rapidly adapt their service delivery models for crucial benefits and services. Shutdowns made in-person operations impossible at a time when more people urgently needed more assistance. Social service agencies saw record demand for existing programs, navigated new federal and state funding sources, and quickly pivoted to create new benefits programs or modify existing ones. Many of these challenges persist today. These disruptions broke the inertia of "business as usual." They revealed a plethora of gaps and challenges that called into question the resilience of the nation's critical safety net programs that are, first and foremost, intended to deliver services to eligible households promptly and efficiently.

As is often the case in crisis environments, the impossibility of business as usual opened the door to innovation. New strategies enabled agencies to meet the challenges of the moment and set the stage for management and technology transformation that could modernize service delivery for decades to come. Indeed, the lessons of the pandemic have created a unique opportunity for agencies to address massive administrative burdens and inefficiencies affecting program operations and the customer experience. For program "customers," this can include lengthy and often burdensome responsibilities placed on applicants and participants--traveling to multiple in-person offices to receive or apply for various services; waiting in long in-person, telephonic, or online queues; repeatedly being asked to provide the same information across integrated programs or systems; and navigating other obstacles to obtaining necessary services. Public benefits programs seeking to address these customer experience challenges can also face barriers to innovation—disparate and disconnected datasets, rigid program rules, stark and growing workforce challenges--that effectively prohibit them from implementing business-process and technology initiatives that could benefit participants and taxpayers.

This context led CAMI and the Center to identify the important need and opportunity to convene multiple stakeholders to identify intergovernmental strategies for improving modern public benefits delivery. A series of meetings in 2022 brought together researchers, advocates, practitioners, technologists, and public sector associations to develop a vision for a modernized public benefits system and recommend strategies to eliminate obstacles hindering innovation and optimization. Discussions focused on designed and at least partially funded at the federal level and administered at the state and local levels. Throughout the process, all discussions centered on two central objectives: improving the citizen/customer experience and enhancing program efficiencies and accuracy. Participants considered the experience of clients, service providers, program

administrators, federal agencies, and the taxpayer in a fully modernized public benefits system. They also explored current federal, state, and local challenges and developed recommendations for a modernized system.

This paper aims to advance the dialogue on system-level issues of public benefits programs. It proposes a vision for modernization that replaces compliance-based administrative functions with a holistic customer-centric experience—emphasizing efficiency, efficacy, and expediency.

Public Benefits Programs Are Crucial to Improving Equity

Public benefits promote equity by assisting those who need it the most and addressing systemic inequities. Assisting low-income individuals and families struggling to make ends meet helps reduce poverty and improve economic outcomes. Public benefits programs help ensure everyone can access basic needs such as food, healthcare, and housing. When tailored to people who cannot afford these necessities, assistance reduces disparities in health outcomes and provides a foundation for economic stability. "Upstream" public benefits address the root causes of social and economic challenges by focusing on prevention rather than reaction.

Programs can and should be intentionally designed to address systemic inequities and discrimination that have historically disadvantaged certain groups of people. For example, programs target outreach and engagement with communities of color, immigrants, or people with disabilities to reduce disparities and promote equity. They also promote social mobility by providing opportunities for education and training, supporting job search and employment, and providing child-care services for working parents. These programs can help break cycles of poverty and provide a pathway to upward mobility.

The Time to Modernize Is Now

Just as the public health emergency (PHE) highlighted many weaknesses in public benefits delivery, its end in May 2023 highlights the urgency for modernization. The "unwinding" of the PHE is likely to be a multi-year process that will strain the capacity of state and local governments. Most of the 92 million enrollees in CHIP and Medicaid¹ will have to recertify their eligibility in short order. More than 14 million people may find they no longer qualify for CHIP or Medicaid coverage in the post-PHE environment.² Communicating with and guiding millions of people through the eligibility recertification maze and assisting those who face a sudden loss in benefits are daunting tasks at a time when state and local governments face historic workforce retention and hiring challenges.

Beyond the PHE itself, the push to modernize the way benefits are delivered aligns with Executive Order 14058 (December 2021),³ directing federal agencies to improve customer experience and rebuild trust in government. In fact, the Executive order specifically directs federal agencies to adopt an outcomes-based

approach to social service management and delivery. These two factors make the need for social services modernization all the more urgent. A systemic approach to improving how programs are administered and made available to households, leaving no stone unturned, can enable a truly effective social safety net that better meets the nation's needs.

Key Characteristics of the Public Benefits System

Today's public benefits system includes a wide range of programs intended to improve people's well-being. This paper focuses on public benefits programs that deliver federally-funded and state- or local-administered assistance to low-income individuals or families. Assistance may be in the form of cash or in-kind benefits, such as housing vouchers, medical care, or free and reduced-price school meals. These programs often limit eligibility by income. Family status, employment, and other life circumstances may further determine eligibility or benefit levels.

Figure 2. Key Characteristics of the Public Benefits System

Public benefits programs are a shared responsibility between the federal government and the states.	Many social service programs are intergovernmental—designed and funded by the federal government and administered by state and local governments. Federal legislation, regulation, and agency policies form the basis of program rules governing eligibility criteria, certification and recertification, benefit levels, reporting requirements, and other program parameters.
Federal funds distributed as block grants may allow or require co-design and co-implementation.	Co-design and co-implementation are collaborative processes involving multiple stakeholders in the development and execution of programs funded through federal block grants. The funds are designated for spending categories, such as healthcare, transportation, or social services. Co-design aims to ensure that the programs align with the unique needs and priorities of the communities they serve. Co-implementation involves shared responsibility and active participation from government agencies at multiple levels. It may involve joint decision making, resource sharing, and coordination of efforts to ensure the successful delivery of services or achievement of program objectives.

<p>The level of government accountable for program administration and service delivery varies by program.</p>	<p>Some federal agencies, such as the Veterans Administration and the Social Security Administration, administer and provide benefits directly to recipients. Others offer funding that states are responsible for administering. States can delegate administration to localities but remain accountable for ensuring compliance with federal rules. The state or local administering agency may assist recipients directly or contract with nonprofit or for-profit service providers.</p>
<p>Fragmented governance impedes system-level improvements.</p>	<p>The current division of responsibilities, authority, operations, and funding limits program officials' incentives and authority to address system-level problems. Housed within various agencies, programs are under the jurisdiction of multiple Congressional committees, without oversight of the system as a whole. Similar divisions can occur at the state and local levels when more than one agency administers public benefits programs.</p>
<p>Varying definitions, timing, and processes create complexity for clients.</p>	<p>Eligibility criteria, documentation and recertification requirements, time limits, and other program parameters vary across programs. For example, a 2017 GAO report compared income definitions across six programs. These programs use Adjusted Gross Income (AGI), Modified Adjusted Gross Income (MAGI), total family income, and earned income. Several programs have further dollar or percentage deductions based on eligible household expenses. Dependents' earnings may or may not be included. Appendix C discusses some of the complexity of income determinations.</p>
<p>Many programs serve the same populations.</p>	<p>According to the Congressional Research Service (CRS), 82 federal programs serve low-income individuals and families.⁴ Many programs serve the same populations, despite differences in eligibility criteria, documentation requirements, recertification requirements, benefit levels, and time limits, among other program parameters. For example, Census Bureau figures show that among the 14.6 million children in the SNAP program pre-pandemic, 92 percent also received assistance through at least one other program. Almost all (89 percent) also received Medicaid/CHIP, and one in five also received WIC.⁵</p>

VISION FOR A MODERNIZED PUBLIC BENEFITS SYSTEM

Modernizing and opening the door to real innovation and new strategic models would enhance the effectiveness of benefit delivery to the millions of people who rely on these programs for critical assistance. A modernized public benefits system would address client needs efficiently and effectively, leading to more equitable outcomes and greater trust in government. This would mean optimizing the client experience by streamlining enrollment and recertifications, improving internal operations, using evidence to inform decision making, fostering innovation, and providing service providers and administrators with adequate financial and technical resources.

This chapter describes the principles, practices, and strategies to achieve modernization. Principles characterize the desired future state and the tenets that shape decision making along the path. Practices describe the processes needed to achieve the future state. Strategies are the steps needed to put the current system on that path.

Principles to Achieve a Modern Public Benefits System

Adapt Quickly to Meet Current and Changing Needs

Public benefits programs have not significantly altered their design since they were created, in some cases nearly a half-century ago, even as the needs of society have changed. For example, there is a growing number of older adults,⁶ a rise in single-parent households,⁷ and a higher incidence of chronic health problems.⁸ Indeed, the tendency has been to layer on top of or adjacent to traditional delivery models rather than rethink how to address today's needs using today's tools. Modernization will allow the system to perform better and continue to adapt in the future.

Increase Accessibility

Accessing and navigating benefits programs can be difficult, even for people familiar with the system. A simplified process will help eligible households learn about and access benefits and ensure that programs serve the intended populations.

Improve Efficiency

Many public benefits programs are administered using long-outdated technology, rendering them inefficient and costly. More modern technology tools and strategies (such as data sharing, integrations, automation, and analytics) can allow program officials to reduce costs, streamline processes, integrate programs, eliminate duplicative processes, and enable collaboration.

Provide Clear Guidance

State program administrators often face ambiguous or conflicting program guidance, resulting in states interpreting the same language differently, impacting the customer experience. Additionally, states with integrated eligibility systems or programs (such as SNAP, TANF, and Medicaid) may struggle to interpret or navigate applicable guidance or regulations from different federal agencies, hindering innovation. As a result, states may not be taking advantage of existing flexibilities, let alone exploring how they could use expanded, responsible flexibilities (often waivers or policy changes) to drive real transformation. Risk aversion is one of the major barriers to innovation and adaptation in any institution, and even more so in the public sector. To maintain perceived or actual compliance with federal requirements, program administrators may have a strong incentive to maintain the status quo.

Enhance Accountability and Increase Accuracy

Taxpayers fund public benefits programs, and governments are accountable for how those funds are used. Modernizing public benefits programs will help increase transparency and accountability, improve payment accuracy and integrity, and help policy makers make informed evidence-based decisions.

Close the Equity Gap

A more efficient public benefits system can reduce the equity gap by targeting support to those most in need, streamlining the steps required to access support, and improving outcomes.

Practices to Achieve a Modern Public Benefits System

The eight practices below describe the processes needed to achieve the future state. Bullets explain how the system would work if the practices were implemented. Many of the vision statements could form the basis of performance measures.

Get the right benefits to the right people promptly

- Eligible individuals and families are aware of and can easily find, apply for, and receive appropriate benefits promptly and in a way that preserves their dignity and privacy, reduces churn, and eliminates benefits and services gaps.
- Administrative effectiveness increases job satisfaction for staff.

Build clients' capacities and improve outcomes

- Recognize that the core objective of the social services system is to build clients' capacities and help them solve problems.
- Program officials use data and technology to connect people to the right combination of resources and ensure they have the support systems necessary to facilitate sustainable changes and life improvements.
- Program design and coordination help clients achieve safety, employment, family stability, and other outcomes. Programs help clients address both short-term and long-term needs. They invest in eliminating precursors to help individuals and families avoid the need for assistance in the first place.
- Performance indicators focus on improved client outcomes.

Steward taxpayer dollars and address a public need cost-effectively

- Federal agencies coordinate policies and operations to eliminate unproductive, unclear, and duplicative processes.
- Improved information systems reduce improper payments and inappropriate denial or provision of services.⁹

Reduce compliance risk and improve program agility

- Program rules, interpretations, and guidance are clear and consistent, eliminating errors in determining eligibility, recertifying, and assigning benefits.
- Enhance program resilience and programs' abilities to adapt to emerging threats, whether that is a pandemic requiring the program to quickly shift operations or external actors attacking systems which in turn have an impact on clients' ability to access benefits.

Remove obstacles to innovation

- Program rules, interpretations, and guidance are clear, consistent, and outcomes-based, allowing administrators to innovate within a limited set of essential and clearly established boundaries.
- Program administrators have the capacity, funding, and knowledge to innovate.

Support continuous improvement

- Program administrators have sufficient data, information, and capacity to assess and improve program performance, improve decision making, reduce risk, and increase accuracy.
- Providers, clients, and communities are consulted and empowered to help design effective assistance and delivery mechanisms.
- Federal agencies have effective mechanisms for states to provide feedback on policy and program design in addition to program administration and enforcement.

Promote equity

- Program design and delivery reduce systemic barriers faced by historically underserved or excluded groups; reaching eligible individuals more effectively entails engaging early with their lived experiences.
- Programs use equity standards for defining, measuring, and determining success in service design, outreach, and delivery, employing appropriate accountability mechanisms.
- Human-centered design principles, which entail designing with the participant at the center and engaging target populations early and often, allow programs to reach their target population more effectively.

Create and reinforce trust across all levels of government

- The federal government ensures states meet minimum standards.
- Accountability and transparency demonstrate effectiveness.
- An improved customer experience promotes trust in the government.

Strategies to Achieve a Modern Public Benefits System

Principles and practices guide the path toward modernization. Figure 3 summarizes the strategies and tactics to put the current system on that path.

Figure 3. Strategies to Achieve Modernization – Summary Table



The client enrollment experience is simplified.

Application, renewal, and recertification processes minimize clients' administrative burden.

Eligibility requirements are clear and readily available.

Eligibility determinations are streamlined and consistent across programs serving common clients.

Eligibility processes recognize client access constraints and offer diverse modes (i.e., not all technology-based).



Programs are cost-effective and efficient.

Program officials have reduced unconstructive, duplicative effort, increased coordination, and established program information-sharing.

Data sharing allows agencies to verify eligibility with fewer "proof burdens."



Data and stakeholder input improve program performance

Integrating and using customer feedback, data, and information improves program performance, reduces risk, improves accuracy, and informs decision making.

Program officials use evidence to inform decision making.

Data sharing, with appropriate safeguards, is the norm.

Clients and service providers, who are central to redesign efforts, are offered multiple opportunities and modes for engagement.

Sharing data across programs makes client analytics possible, providing a fuller understanding of the client experience.



State and local governments can innovate and are given incentives to do so

Program design and rules align with current needs and priorities.

Rules, interpretations, and program guidance are clear, complete, and consistent, making innovation a viable path to problem-solving.

Federal agencies focus on well-defined outcome measures rather than administrative process requirements to ensure states remain compliant.

The approval process for waivers and pilots is streamlined.

Federal agencies use their oversight role to develop and share knowledge about what works.



States have adequate resources to innovate

States have the capacity and authority to modernize.

Information about success (such as pilots and other states' innovations) is shared effectively.

States have adequate financial resources to invest in system-level improvements and train their staff on how to implement those improvements.



Enrollment

The Client Enrollment Experience Is Simplified

What it looks like:

People are aware of programs and eligibility requirements. Outreach and awareness efforts target populations most likely to be eligible. Program information is readily available and easily understood.

Application, renewal, and recertification processes minimize clients' administrative burden. Applying for benefits is a straightforward process with realistic documentation requirements. The method of signing up does not discourage or delay people from enrolling. As a result, program enrollment more effectively reaches all eligible for services.

Eligibility requirements are clear, consistent, and readily available. Clarity of eligibility requirements serves several purposes. Accurate program information helps clients provide accurate applications and documentation, which in turn helps caseworkers make the right determinations promptly. Intake is more efficient as applicants and caseworkers spend less time collecting, entering, and reviewing inaccurate or incomplete information. Applicants can determine if they are receiving appropriate benefits. Churn and interruption of benefits are reduced because people are aware of their recertification windows.

Eligibility determinations are streamlined and consistent across programs serving common clients. States are granted flexibility to ensure prompt, effective, and efficient services to the client base. Service providers and clients have rapid access to case workers empowered to resolve ambiguities and respond to questions. Overall, the process reduces the number of ways and times applicants must prove they are qualified.

How to get there:

Design, implement, evaluate, and improve social services outreach, enrollment, and service delivery systems to streamline and simplify the client experience.

1. Conduct customer research using inclusive human-centered design methods to better understand and address the needs of current customers and those who are eligible but not participating. Apply findings and insights to inform improvements and design of new capabilities and solutions.¹⁰

2. Create "no-wrong-door" channels to access and enroll in services. This may include multi-modal, multi-language portals, such as in-person, online, or by telephone, which must be accessible regardless of the language spoken or disability.
3. Design program portals to be fully mobile-phone accessible.
4. Provide clear and accurate program information, allowing recipients and service providers to avoid the risk of receiving improper benefits. Help people identify what they're eligible for, and when necessary, help them complete the paperwork.
5. Develop and make easily available instructional videos and step-by-step guides in multiple formats and languages.
6. Establish consistency across programs in requirements, procedures, and documentation to reduce complexity in enrollment and management. Develop common definitions of key eligibility components, such as income, household, deductions, employment status, etc.
7. Calibrate services to individuals' multi-faceted needs; engage with people on their preferred communication and engagement channels.
8. Coordinate the timing of recertification requirements and develop proactive, personalized notification and simplified renewal processes.
9. Implement community eligibility provisions (CEP), cross-eligibility, direct certifications, and other means to use eligibility for one program as a threshold for automatic eligibility for another.

Several states have implemented some of these strategies to simplify or consolidate eligibility determinations. See Appendix E.



"No wrong door" is a concept used in social services to ensure that individuals seeking assistance can access the services they need, regardless of where they first seek help. The idea behind "no wrong door" is that individuals should be able to access the services they need without having to navigate a complex system or be turned away due to bureaucratic barriers or arbitrary eligibility requirements. The no-wrong-door approach is typically achieved through coordination and collaboration among different service providers and agencies to create a seamless system of care that meets the needs of the individuals seeking assistance. Service providers and agencies can share information and resources, creating common intake and referral processes and establishing eligibility and service delivery standards.



Operations

Programs Are Cost-effective and Efficient

What it looks like:

Program officials have reduced unconstructive and duplicative effort, increased coordination, and established program information-sharing. Program staff no longer repeat each other's work by collecting and re-reviewing the same documentation across programs, thereby streamlining certifications. Eliminating unconstructive steps improves efficiency, reduces opportunities for error, improves the meaning of work for agency staff, and streamlines the verification process.

Data sharing allows agencies to verify eligibility with fewer "proof burdens." Applicants have straightforward means to provide proof if data sharing does not confirm eligibility and submit data updates and corrections.

How to get there:

Streamline and modernize work processes using smart, contemporary management and technology strategies that facilitate coordination and focus on providing services

1. Combine or stack applications and eligibility determinations; verify original/source data once; streamline determinations by matching verified information to applicants.
2. Develop data governance language and standards and create a site to share client eligibility data.
3. Expand access to third-party sources for eligibility verification when appropriate.
4. Issue guidance that explicitly prioritizes taking a customer-centered, outcome-oriented approach.
5. Develop customer-oriented metrics.
6. Shift oversight of state performance from compliance to client outcomes; hold states accountable through outcomes.
7. Establish a service-provider-to-policy-maker feedback loop to keep Congressional staff and policy makers abreast of emerging complexities in the current human service system and opportunities for simplification and improvement.
8. Create a Congressional mechanism to consider the ways and means of integrating and funding programs across committee jurisdictions.



Use of Evidence

Data and Stakeholder Input Improve Program Performance

What it looks like:

Integrating and using data and information improves program performance, reduces risk, improves accuracy, and informs decision making. Programs collect and use comprehensive, integrated program and customer feedback data to create program analytics, run diagnostics, track performance, and enhance program functioning.

Program officials use evidence to inform decision making. Evidence may include input from clients and service providers, experts' professional opinions, empirical data, results of program evaluations, and other research. Program officials have the means to demonstrate improved performance, which is especially important when trying to justify an innovation or exercise flexibility.

Data sharing, with appropriate safeguards, is the norm. Analysis of program and shared data improves decision making by

- Identifying and informing program officials where process problems exist and how to resolve them.
- Finding ways to improve operations. Search for positive outliers using practices that work well when tried in other places. Improve program design by better understanding causal and correlative relationships. Identify individuals and families who are underrepresented and those who are most in need of targeted assistance. Identify and resolve process problems.
- Increasing adoption of better practices and reducing the use of those that have not been successful, for instance, by communicating data and evidence in more useful ways, using well-designed incentive systems, and nurturing continuous-learning-and-improvement communities.
- Building understanding of and trust in government.

Clients and service providers participate in redesign efforts. By involving public benefits recipients and providers in the design process, states can ensure that their programs are better aligned with the realities of poverty and the challenges that recipients face. Programs are more effective, efficient, and responsive to the needs of those they serve. Customer interviews, the voice of customer feedback, surveys, focus groups, advisory boards, and co-creation are among the ways program administrators can include clients and service providers.

Sharing data across programs makes client analytics possible, providing a fuller understanding of the client experience. Providers can determine what works, refine outreach for different populations, adjust the mix of services, and detect differential impact by demographic and geographic characteristics.

How to get there:

Collect, integrate, and analyze data and information to improve program performance

1. Integrate program data to improve performance, deter fraud, and reduce improper payments.
2. Measure and monitor equity and administrative burden across groups and reduce gaps.
3. Create standard, modern-day guidance on privacy and data-sharing requirements to facilitate cross-program data analytics and enable personalized service delivery.
4. Map the end-to-end client experience across the range of services needed to achieve the desired outcome (meaningful work, stable housing, mental health, addiction control, etc.) to meet clients and social workers where they are, based on inclusive customer research and input.
5. Develop a strategy to incorporate clients and operators into redesign efforts.
6. Provide greater opportunities for state and local participation early in developing federal legislation and regulations.
7. Collect and use qualitative client feedback obtained through interviews, observations, surveys, call logs, web analytics, help desk tickets, and other means.

Innovation



State and Local Governments Can Innovate and Are Given Incentives To Do So

What it looks like:

Program design and rules align with current needs and priorities. Administering agencies use technological advancements to engage with and deliver services to people in ways that were not previously possible—but today remain largely untapped. State and local governments can use innovative strategies to offset staff shortages, such as contracting with non-government entities. States can work directly with for-profit and not-for-profit partners to

address problems and make improvements. Rules focus on the most crucial, mission-centric requirements: payment accuracy, customer service quality, transparency, and cost efficiency.

Rules, interpretations, and program guidance are clear, complete, and consistent, making innovation a viable path to problem-solving. Federal agency rules, interpretations, and guidance balance flexibility with compliance and risk minimization. Federal officials collaborate with program administrators to identify options and create guidelines for innovation. States can pursue innovative, transformative program strategies with an understanding of the basic compliance requirements and allowable innovations. Safe harbors¹¹ establish conditions states must meet to avoid the risk of non-compliance.

Federal agencies focus on well-defined outcome measures rather than administrative process requirements to ensure states remain compliant. Provisions to ensure program integrity are clear and central to program reporting and evaluation.

The approval process for waivers and pilots is streamlined. Federal agencies simplify and expedite the process, reducing the consumption of limited state resources. Knowledge bases provide sources of evidence or tools to conduct the analysis needed to justify requests. Review and approval are expedited, allowing states to explore emerging needs or respond to exigent circumstances promptly.

Federal agencies use their oversight role to develop and share knowledge about what works. States and localities can use the knowledge to improve their operations. Federal officials use feedback from state and local administering agencies, including customer experience data and broader community input, to further understand and address the impact of policies and administrative arrangements.

How to get there:

Provide clear guidance to reduce uncertainty

1. Establish consistency and clarity in requirements.
2. Create safe harbors to reduce or eliminate risk.
3. Identify statutory or regulatory provisions most commonly waived and modify those provisions or streamline the process to receive a waiver.
4. Clarify allowable use of existing funds and create new funding mechanisms.



Resources

States Have Adequate Resources to Innovate

What it looks like:

States have the capacity and authority to modernize: States have sufficient capacity to pursue innovation that could help solve key challenges and needs. States invest in their capability, technology, and workforce and tap external sources of support.

Information about success (such as other states' pilots or innovations) is shared effectively. The results of pilot evaluations are fed back into program design. States and federal agencies have effective ways to share and apply learning from pilots.

States have adequate financial resources to invest in system-level improvements. Strategic investments that address systemic issues and provide broader, deeper impact over the long term are prioritized and pursued. Today, limited resources are frequently directed to immediate needs rather than invested in more strategic enhancements.

How to get there:

Expand state and local capacity to innovate.

1. Invest in state capacity: staffing, training, funding, pay, and technology.
2. Increase funding for non-competitive grants or otherwise provide adequate resources to state and local governments to invest in modernization.
3. Improve states' knowledge bases by creating a cross-agency and cross-program clearinghouse of best or promising practices and an inventory of tools and technical assistance resources to aid implementation.
4. Expand federal support for state and local organizations that can promote or assist in implementing best and promising practices.
5. Give states and local governments the flexibility, within clearly defined guardrails, to engage in innovative, force-multiplying partnerships with the private sector. (Force multipliers are tools and resources that amplify effort.)

CONCLUSION

Today's public benefits system is the product of decisions made at multiple levels of government and across multiple agencies over many decades. Individual programs largely reflect the time in which they were created, with varying understandings of need, the appropriate role of government to address it, the potential for technology to improve operations, and the role of information in improving decision making. Programs have some mechanisms to allow innovations, but those mechanisms largely do not address how individual programs fit into the system and do not resolve system-level issues. Modernization requires system-level governance in place of fragmented governance. The current division of responsibilities, authority, operations, and funding limits program officials' incentives and authority to address system-level problems. Housed within various agencies, programs are under the jurisdiction of multiple Congressional committees, without oversight of the system as a whole. Similar divisions can occur at the state and local levels when more than one agency administers public benefits programs.

Modernization creates a holistic, integrated approach that optimizes the client journey and outcomes rather than isolated improvements of individual touchpoints or process steps. With visibility into the end-to-end customer journey, program officials widen their focus beyond the interactions and processes for which they are responsible.

System-level design brings uniformity to program language, definitions, procedures, and requirements. Siloed and layered administration is consolidated, while individual programs, program purposes, and flexibilities are complementary and coordinated. Unnecessary, unconstructive, and expensive complexity has been eliminated.

Emerging technology enables program administration and service delivery coordination in ways that were not possible when the programs were initially designed. Currently, federal agencies and program administrators can incorporate new technology, but it often requires special permission, the capacity to design and implement, and the resources to execute. The result is piecemeal rather than comprehensive. Technology can alleviate ongoing staff shortages by allowing clients to perform many basic functions online.

Modernizing today's public benefits system is an intergovernmental and cross-sectoral endeavor. Many steps require state or local initiative and federal support or approval.¹² New federal, state, and local mechanisms will be needed to coordinate the development and implementation of human services on a cross-agency, cross-program basis. The path to modernization can begin when a political consensus for change, or a new crisis, emerges.

Appendix A: Study Team Biographies

Nancy Augustine: Academy Project Director; Director, Center for Intergovernmental Partnerships. Dr. Augustine has led projects for the Legislative Branch, the Department of Commerce Office of Inspector General, and the U.S. Merchant Marine Academy. She specializes in intergovernmental relations, public management, policy assessment, environmental and cultural resource protection, comprehensive strategic planning, state and local fiscal issues, and planning for investments in facilities and infrastructure.

Miles Murphy: Senior Research Analyst, Center for Intergovernmental Partnerships. Mr. Murphy oversees the coordination, planning, and facilitation of meetings, research, and analysis related to all aspects of the Academy's intergovernmental activities. He is a developing subject matter expert on intergovernmental partnerships with an area of interest in environmental, coastal, and ocean policy.

Brad Riley: Research Associate, Center for Intergovernmental Partnerships. Mr. Riley has over 20 years of servant leadership in the public and nonprofit sectors, emphasizing housing policy, social epidemiology, and advocacy for historically excluded populations. He is also a City Councilor for the City of Easthampton, Massachusetts, serving on the Ordinance Committee and Chair of the Appointment Committee overseeing 29 community boards and commissions.

Appendix B: Series Participants

A series of meetings in 2022 brought together researchers, advocates, practitioners, technologists, and public sector associations to develop a vision for a modernized public benefits system and recommend strategies to eliminate obstacles hindering innovation and optimization. The final version of this paper represents a consensus view of participants, but it may not reflect the opinions, beliefs, or positions of individual participants or their organizations.

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Appendix C: Complex Definitions of Income

Navigating social service programs and applying for benefits is complex and burdensome. Each program calculates eligibility differently or may exclude applicants entirely depending on the household structure.

Programs use various definitions of poverty. Housing and Urban Development utilizes [area median income](#), [median household income](#), and [fair market rents](#) to determine eligibility for housing vouchers. Medicaid considers an individual's modified adjusted gross income (MAGI) from the most recent tax return. Low Income Home Energy Assistance Program (LIHEAP) income eligibility is determined when a household is at or below 150% of the [Federal Poverty Guideline](#) or 60% of the [State Median Income](#). Each state determines eligibility differently and offers unique benefits depending on seasonal climates.¹³

Supplemental Nutrition Assistance Program (SNAP) benefits consider [countable net income](#) for eligibility, which is adjusted household income after deducting certain expenses like rent and dependent care. Then, a calculation is applied where 30% of countable net income is subtracted from the maximum benefit allotted to household size, but only if household income is no more than 130% of the Federal Poverty Guideline. Further complicating the SNAP calculations, this program considers all unearned and earned income. The more social service benefits a family is enrolled in, the smaller the SNAP benefits they receive.

The burden of understanding, supplying income and budget documentation, and applying for benefits falls squarely on a population less equipped to navigate social services than any other population in the United States. Among 2017 Temporary Assistance for Needy Families (TANF) recipients, 59.1% attained no more than a high school diploma. SNAP and Supplemental Security Income (SSI) statistics are higher at 64.2% and 74.3%, respectively.¹⁴ Households with limited English proficiency may further struggle.

Applicants are not the only people experiencing these unnecessary burdens. Social workers are tasked with understanding eligibility nuances and being able to communicate them to applicants in terms or languages they can understand with a cultural competency that is difficult to achieve. The National Association of Social Workers released a 60-page manual on standards and indicators of cultural competency for social workers to understand to be effective communicators for historically excluded populations.¹⁵ Further, a household may have many benefits to manage, but a social worker has many households to manage, each with its own complexities. These administrative burdens can lead to missed appointments or deadlines, resulting in the cancellation of benefits and social work burnout.

All these complexities and burdens exist within a system that is difficult to change. SNAP exists within the U.S. Department of Agriculture, housing assistance exists within Housing and Urban Development, and other benefits can be found within

Health and Human Services, the Social Security Administration, and the Internal Revenue Service. Each agency is governed by its own federal laws and policies and has its own budgetary oversight in Congress.

The table below recreates tables 5 and 6 of a 2017 Government Accountability Office report, "Federal Low-Income Programs: Eligibility and Benefits Differ for Selected Programs Due to Complex and Varied Rules." It illustrates the varying approach to defining income and whose income counts.¹⁶ The six programs use Adjusted Gross Income (AGI), Modified Adjusted Gross Income (MAGI), total family income, and earned income. Some have further dollar value or percentage deductions. Dependents' earnings may or may not be excluded.

Figure 4. Whose Income Counts in Determining Eligibility and Types and Amounts of Earned Income Disregarded in Determining Initial Financial Eligibility, Selected Low-Income Programs as of December 31, 2016

Earned Income Tax Credit (EITC)	
<i>Whose income counts</i> Individual taxpayers or married couples (if filing a joint return). All income and earnings amounts are calculated at the tax return level.	<i>Earned income disregarded for eligibility</i> Federally-set rules: Adjusted Gross Income (AGI), which partially determines the credit amount from EITC, includes additional sources of income besides earned income and permits certain allowable deductions. However, no specific earned income types are always disregarded in determining eligibility.
Housing Choice Vouchers	
<i>Whose income counts</i> Family, meaning a single person or a group of persons living together.	<i>Earned income disregarded for eligibility</i> Federally-set rules: After total annual income has been calculated (including both earned and unearned income), there is a mandatory deduction of \$480 for each dependent and \$400 for any elderly family or disabled family members. In addition, the Housing Choice Voucher excludes earned income of minors, among others, when calculating annual income.
Medicaid	
<i>Whose income counts</i> Household, based on Modified Adjusted Gross Income (MAGI). ^a With certain exceptions, Medicaid defines total household income as the sum of the MAGI-based income of every individual included in the household.	<i>Earned income disregarded for eligibility</i> Federally-set rules: Specific earned income disregards are not permitted for Medicaid eligibility under MAGI-based rules.

Supplemental Nutrition Assistance Program (SNAP)

Whose income counts

Household, including all eligible and ineligible household members (such as those with an intentional program violation). Earned income of children under 18 who are elementary or secondary school students is exempted from countable household income.

Earned income disregarded for eligibility

Federally-set rules: The federal earned income deduction provides for a 20% deduction of earned income.

Supplemental Security Income (SSI)

Whose income counts

Individual or married couple applying for benefits, as well as others in the household. For example, if applicant has a spouse living in the same household who is not eligible for benefits, that individual's income is considered. If applicant is under 18 and living in the parent(s) household, parent(s) income is considered.

Earned income disregarded for eligibility

Federally-set rules: After total monthly income has been calculated, there is a mandatory deduction of \$20 per month of income and \$65 per month of earnings for recipients plus one-half of remaining earnings.

Temporary Assistance for Needy Families (TANF)

Whose income counts

Family, which is determined by the state and includes dependent children, their siblings, and their parents or other caretaker relatives living together.

Earned income disregarded for eligibility

Federally-set rules: Specific earned income disregards are not permitted for Medicaid eligibility under MAGI-based rules.

Source: U.S. Government Accountability Office.

Appendix D: Agile Government Principles

The strategies to achieve modernization align with several agile government principles, listed below.

Mission should be extremely clear, and the organizational unit laser-focused on achieving it.

Metrics for Success should be widely agreed upon, evidence-based, and easily tracked.

Customer-Driven Behavior should include frequent interaction with program beneficiaries and be ingrained in the culture.

Speed should be encouraged and facilitated through co-location where possible.

Empowered, Highly Skilled, Cross Functional Teams should engage in continual face-to-face communication should replace siloed bureaucratic systems.

Innovation should be rewarded—within the overall framework of existing rules and regulations — and changes in rules and regulations should be proposed where necessary.

Persistence should feature continuous experimentation, evaluation, and improvement in order to learn from both success and failure.

Evidence-Based Solutions should be the gold standard for creating program options.

Organizational Leaders should eliminate roadblocks, aggregate and assume risk, and empower teams to make decisions.

Diversity of Thought should be encouraged.¹⁷

Appendix E: Innovations in Eligibility Determinations and Data Sharing

Several states have streamlined or consolidated eligibility determinations by using information already available. Below are some examples.

The **Community Eligibility Provision (CEP)** is a program under the National School Lunch Program (NSLP) that allows high-poverty schools to provide free breakfast and lunch to all students without requiring individual eligibility applications. Under CEP, schools use a formula to determine the percentage of low-income students based on the number of students who are directly certified for free meals because they live in households that participate in other government programs, such as the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF). If the percentage of directly certified students in a school is above a certain threshold (usually 40%), then the entire school is eligible for free meals for all students.¹⁸ In the 2021-2022 school year: 33,300 schools in 5,543 districts participated.¹⁹ School districts participating in NSLP must certify individual children's eligibility directly based on the family's participation in SNAP.

Direct certification automatically qualifies individuals for program benefits based on their participation in other government programs or status as a specific group member. For example, in the National School Lunch Program (NSLP), schools can use direct certification to automatically enroll students in the program based on their eligibility for other means-tested programs, such as the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF).

Cross-eligibility determinations can qualify an individual or family for multiple benefits from different programs. Customer experience and program administration efficiency gains result when public benefits agencies can leverage technology solutions, such as **integrated eligibility systems (IES)**, to streamline cross-eligibility determinations. These systems can help to reduce duplicative processes and improve the coordination of benefits. An IES integrates information from multiple databases and sources, such as income, employment, housing, and health records, to comprehensively view an individual's circumstances. The system can allow individuals to apply for multiple programs. It typically includes online applications, automated eligibility determination, and case management tools to help caseworkers manage cases and provide ongoing support to eligible households. These systems can improve the efficiency and accuracy of benefit delivery, streamline the application process, and reduce the administrative burden on government agencies.



For example, Illinois switched to an IES in 2017. It integrates data from multiple social service programs, including Medicaid, SNAP, and TANF. For medical benefits recertification, the system automatically generates clearance data and known case information for recipients to verify.²⁰



Code for America partnered with the Minnesota Department of Human Services in 2020 to develop MNBenefits, which allows users to apply for nine programs through a single online portal. Feedback from recipients and data analytics allowed the development team to finetune the system and gain insight into the client journey.²¹ MNBenefits uses a client-centered approach to eligibility determination, which means that it focuses on the needs and circumstances of the applicant rather than the specific program requirements.



New York State is developing an IES, aiming for a "no wrong door" standard for nutrition assistance programs.²² It integrates information from multiple databases, including income, employment, and immigration status, to determine eligibility for SNAP and other benefits. Applicants can submit documents electronically. A mobile application allows users to view their benefits, check their certification status, and report changes in their circumstances, such as a change in income, household composition, or employment status.



California counties are collaborating to develop an automated, integrated eligibility and case management system.²³ CalSAWS will be the case management system for CalWORKs, CalFresh, Medi-Cal, Foster Care, Refugee Assistance, County Medical Services Program, and General Assistance/General Relief in all 58 California counties. The system is expected to be online by the end of 2023.



Data-sharing agreements underlie IES, allowing agencies to share information about individuals' eligibility for different programs. These agreements can reduce the need for duplicative determination, documentation, and verification processes. For example, California's Health and Human Services Data Exchange Framework is developing a means for healthcare providers, government agencies, and social services programs to share patient information safely, beginning in 2024.²⁴



Standardized data elements and formats for social service programs can pave the way for data-sharing. For example, the North Carolina Families Accessing Services Through Technology (NC FAST) uses the National Information Exchange Model (NIEM) to improve the speed and accuracy of information exchanges with other government systems.²⁵ NIEM is a community-driven, standards-based approach to exchanging information between organizations, including social service programs and agencies. The model provides a common vocabulary and framework for defining data elements and formats, allowing different programs and agencies to share and integrate data more easily. This can help improve coordination and collaboration across multiple programs and agencies and improve the overall effectiveness of social service programs by reducing duplication of effort and improving access to relevant data.²⁶

CMS temporarily provided financial support to states developing integrated systems to determine eligibility for several medical benefits programs.²⁷

End Notes

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- ² Tolbert, Jennifer, and 2023. 2023. “10 Things to Know about the Unwinding of the Medicaid Continuous Enrollment Provision.” KFF. January 11, 2023. <https://www.kff.org/medicaid/issue-brief/10-things-to-know-about-the-unwinding-of-the-medicaid-continuous-enrollment-provision/>.
- ³ “Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government.” 2021. The White House. December 13, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/12/13/executive-order-on-transforming-federal-customer-experience-and-service-delivery-to-rebuild-trust-in-government/>.
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- ⁵ Bureau, US Census. n.d. “Nearly a Third of Children Who Receive SNAP Participate in Two or More Additional Programs.” Census.gov. Accessed March 31, 2023 at <https://www.census.gov/library/stories/2021/06/most-children-receiving-snap-get-at-least-one-other-social-safety-net-benefit.html>
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- ⁷ Paul Hemez and Chanell Washington, “Percentage and Number of Children Living with Two Parents Has Dropped since 1968,” Census.gov (U.S. Census Bureau, March 25, 2022), <https://www.census.gov/library/stories/2021/04/number-of-children-living-only-with-their-mothers-has-doubled-in-past-50-years.html>.
- ⁸ American Hospital Association. “Focus on Wellness.” Health for Life - American Hospital Association (2007) Available at: https://www.aha.org/system/files/content/00-10/071204_H4L_FocusonWellness.pdf.
- ⁹ According to the Centers for Medicare and Medicaid Services (CMS), improper payments include unintentional payment errors, insufficient documentation to support payment of legitimate charges, fraud, and abuse. Improper payments can include underpayments as well as overpayments. “Fiscal Year 2022 Improper Payments Fact Sheet | CMS.” n.d. [www.cms.gov](https://www.cms.gov/newsroom/fact-sheets/fiscal-year-2022-improper-payments-fact-sheet). Accessed April 13, 2023 at <https://www.cms.gov/newsroom/fact-sheets/fiscal-year-2022-improper-payments-fact-sheet>.
- ¹⁰ Human-centered design is an approach to problem-solving and innovation that focuses on understanding and meeting the needs, desires, and experiences of the people who will be affected by the solution. It is a design philosophy that puts people at the center of the design process, with the goal of creating solutions that are more effective, useful, and satisfying for the people who will use them.
- ¹¹ Wikipedia defines a safe harbor as “a provision of a statute or a regulation that specifies that certain conduct will be deemed not to violate a given rule.” In this case, creating a safe harbor may be possible without a change in federal regulations.
- ¹² Several strategies are consistent with agile government principles, defined by the National Academy of Public Administration as “mission-centric, customer-focused, communication and collaboration enabled, and continually demonstrating success to customers and the public.” For more information about agile government principles, see Appendix D.

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- ¹³ “Percent of Poverty Guidelines for Liheap Components.” The LIHEAP Clearinghouse. Accessed March 5, 2023. <https://liheapch.acf.hhs.gov/tables/POP.htm>.
- ¹⁴ U.S. Census Bureau. “Those With a High School Diploma or Less Make Up Majority of Government Assistance Recipients.” Census.gov. Last modified May 12, 2021. <https://www.census.gov/library/stories/2021/05/more-than-one-in-seven-social-safety-net-recipients-in-2017-were-college-graduates.html>.
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- ¹⁶ U.S. Government Accountability Office. “Federal Low-Income Programs: Eligibility and Benefits Differ for Selected Programs Due to Complex and Varied Rules.” 2017. <https://www.gao.gov/products/gao-17-558>. Table 5: Applicant Unit and Whose Income Is Counted in Determining Eligibility among Selected Low -Income Programs (as of December 31, 2016) and Table 6: Types and Amounts of Earned Income Disregarded in Determining Initial Financial Eligibility, by Selected LowIncome Program (as of December 31, 2016)
- ¹⁷ “Can Government Be Agile?” Agile Government Center, National Academy of Public Administration, October 2019. https://www.businessofgovernment.org/sites/default/files/Can%20Government%20Be%20Agile_Trifold_WEB.pdf
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- ²³ “CalSAWS” 2023. <https://www.calsaws.org/>.
- ²⁴ “Data Exchange Framework.” Center for Data Insights and Innovation, n.d. <https://www.chhs.ca.gov/data-exchange-framework/>.
- ²⁵ “North Carolina Families Access Services through Technology.” National Information Exchange Model, n.d. <https://www.niem.gov/about-niem/success-stories/north-carolina-families-accessing-services-through-technology>.
- ²⁶ “Human Services.” National Information Exchange Model, n.d. <https://www.niem.gov/communities/human-services>.
- ²⁷ Mann, Cindy, Kevin Concannon, George Sheldon, and Steve Larsen. “Dear State Exchange Grantees, Medicaid and CHIP Directors, and Health and Human Services Directors.” *Centers for Medicare & Medicaid Services*, August 10, 2011. https://www.cms.gov/CCIIO/Resources/Files/Downloads/final_tri_agency_Letter_081011.pdf.