

# **Report of the Special Task Force on State Verification and Eligibility**

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Submitted by:

Gerald McDonough, designee for the State Auditor

Jim McKinlay, designee for the Attorney General

Jim MacDonald, designee for the State Treasurer

Julie Flaherty, designee for the Inspector General

Kathleen Betts, designee for the Secretary of Health and Human Services

Anna Freedman, designee for the Secretary of Administration and Finance

## **EXECUTIVE SUMMARY**

In July 2013, the Legislature created the Special Task Force on State Verification and Eligibility (Special Task Force) to study the feasibility of developing a common eligibility standard for all Massachusetts agencies administering public assistance programs. A common eligibility standard is a single set of criteria to determine eligibility for multiple public assistance programs.

To understand the context for the legislative mandate, the Special Task Force engaged in a broad review of the current status of eligibility processing for public assistance programs in Massachusetts. As a result, the Special Task Force sought information regarding certain data-sharing initiatives among Massachusetts agencies and the use of a common application for public assistance programs in other states. The information reviewed by the Special Task Force indicated that states currently use different eligibility processing models to achieve efficient and effective eligibility processing for public assistance programs.

While this report notes that the common application model is used in many states, but not in Massachusetts, EOHHS reported that developing consumer-friendly changes to its eligibility determination and processing systems has been a priority over the past several years. Massachusetts has already implemented data-sharing methods to ensure that consumers who are eligible for a particular benefits program are automatically enrolled without completing another application. In addition, after verifying eligibility for a public assistance program, some state agencies send participant data to other programs for which the consumers are clearly eligible. For example, the Department of Transitional Assistance and MassHealth provides a list of children who are eligible for benefits to public schools so the children can be automatically enrolled in free or reduced lunch programs without completing an application for that benefit. These actions are intended for the same purpose as common applications in other states.

While many improvements have been made, it is important for Massachusetts to continue to make process and system enhancements to improve the consumer's experience and make the administration of programs as efficient as possible. The Special Task Force obtained information about initiatives under way to improve communication between agencies administering public assistance programs, including the Executive Office for Health and Human Services (EOHHS) implementation of an Integrated Eligibility System (IES) and integrated service delivery model (also known as "no wrong door"). These efforts will allow consumers to approach any EOHHS agency to apply for a public assistance program and experience a direct connection with related programs and services. EOHHS reported that the implementation of these initiatives will greatly improve the customer's application experience. As an example, consumers will not have to fill out additional, potentially burdensome, paperwork as their initial application will be considered for other programs "behind the scenes."

Additionally, recognizing that the feasibility of developing a common eligibility standard was its legislative mandate, the Special Task Force concluded that Massachusetts should consider other options for streamlining eligibility processes, including the use of a common application, as it continues to make improvements. The Special Task Force concluded that because public assistance programs vary in their funding sources and purposes, and because federal and state

laws and regulations determine eligibility factors, there is no single set of qualifying criteria for all public assistance programs and therefore, development of a common eligibility standard is currently an unattainable goal. However, the Special Task Force also found that creating a more effective and efficient application and review process for public assistance programs is the ultimate goal. The Special Task Force recommends further study and analysis of best practices in Massachusetts and other states in order to achieve a more effective and efficient process.

## **I. BACKGROUND**

The legislative mandate for the Special Task Force on State Verification and Eligibility (“Special Task Force”) appears in Section 73 of Chapter 36 of the Acts of 2013. It states:

There is hereby established a special task force on state verification and eligibility consisting of 6 members: the state auditor or a designee; the attorney general or a designee; the inspector general or a designee; the state treasurer and receiver general or a designee; the secretary of health and human services or a designee; and the secretary of administration and finance or a designee, who shall serve as chair of the task force. The task force shall make an investigation and study of the following issues: (1) the development of a common eligibility standard to be applied to all agencies of the commonwealth administering public assistance programs; (2) the obstacles to the implementation of a common eligibility standard; (3) the fiscal impacts to the commonwealth of implementing a common eligibility standard; (4) any federal limitations on the implementation of such a standard; and (5) any ancillary impacts to the commonwealth or recipients of public benefits. Subject to appropriation, the task force may hire an independent consultant to conduct research and assist with the development of any recommendations. The task force shall report to the general court the results of its investigation and study, and its recommendations, if any, together with drafts of legislation to carry its recommendations into effect, by filing the same with the clerks of the senate and the house of representatives on or before March 15, 2014.

In March 2014, through a subsequent supplemental appropriations bill, the Legislature extended the reporting deadline to June 16, 2014. Since that time, the Special Task Force requested an extension, and in October 2014, the Legislature further extended the reporting deadline to December 15, 2014 in a supplemental appropriations bill.

Jennifer Saubermann, serving as the designee of the Secretary of Administration and Finance, was the original Chair of the Special Task Force and continued in this role until March 7, 2014. Anna Freedman replaced Jennifer Saubermann as designee and Chair on April 29, 2014.

Other members of the Special Task Force are: Jim MacDonald serving as the designee of the Treasurer; Jim McKinlay serving as the designee of the Attorney General; Gerald McDonough serving as the designee of the State Auditor Suzanne Bump; Julie Flaherty serving as the designee of the Inspector General; and Kathleen Betts serving as the designee of the Secretary of Health and Human Services.

## **II. DEFINITIONS**

### **Common application**

A single online or paper application for multiple public assistance programs, such as food assistance, cash assistance and Medicaid benefits. The common application is a method that collects personal and income data and provides it to separate public assistance programs so that each program can determine whether an applicant is eligible for benefits, based on the specific standards for each program.

### **Common eligibility standard**

A single set of qualifying criteria for public assistance programs.

### **Consumer**

Refers generally to individuals and families who seek to access or obtain public benefits in the Commonwealth. The term encompasses both applicants and recipients.

### **Emergency Assistance to the Elderly, Disabled and Children (EAEDC)**

A small, entirely state-funded cash benefits program for elderly individuals, disabled persons, caregivers of disabled persons and dependent children who are in the care of someone who is not related to them. Eligible persons must be U.S. citizens or legal immigrants, meet income and asset tests and comply with support and other obligations.

### **Low Income Home Energy Assistance Program (LIHEAP)**

A federally-funded block grant program administered through community action agencies that assist low income households with energy costs. Households must meet specific income thresholds and apply during heating season.

### **Public assistance programs**

Benefits for low income families and/or individuals, which include cash assistance, food programs, child care, energy/utility assistance, homelessness programs, housing programs, and subsidized health coverage.<sup>1</sup> State-issued Electronic Benefit Transfer (EBT) cards provide

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<sup>1</sup> See Appendix A for a description of the public assistance programs that the Special Task Force included in this definition and more specific information about qualifying criteria, requirements and benefits amounts for each program. A subset of these programs mentioned in the report is also defined in Section II above.

consumers with access to cash and/or food benefits accounts for certain public assistance programs administered by the Department of Transitional Assistance (DTA).

### **Supplemental Nutrition Assistance Program (SNAP)**

An entirely federally-funded food and nutrition program for a wide range of families and individuals administered by the United States Department of Agriculture (USDA), in cooperation with DTA. Eligible persons must be U.S. citizens or legal immigrants, meet certain gross and net income thresholds and comply with other program obligations. Formerly known as “food stamps,” SNAP benefits are automatically loaded onto an eligible household’s EBT card each month so the household can purchase groceries at authorized food stores. The cost of eligible food items is deducted automatically from the household’s account when consumers make purchases.

### **Transitional Assistance to Families with Dependent Children (TAFDC)**

A state and federally-funded program administered through DTA which provides cash assistance to families with dependent children and certain pregnant women. Recipients must also be U.S. citizens or legal immigrants, reside in Massachusetts and comply with child support, work program and other obligations.

### **Verification**

The process of determining eligibility for public assistance programs.

### **Verification documents**

Documents (such as birth certificates, pay stubs, proof of immigration status and proof of address) used to determine eligibility for benefits programs.

### **III. APPROACH**

To fulfill its statutory mandate, the Special Task Force held eleven meetings, all with notice to the public in accordance with the Open Meeting Law, G.L. c. 30A, §§ 18-25.<sup>2</sup> Interested stakeholders from the Massachusetts Law Reform Institute, Greater Boston Legal Services or Rosie's Place participated in most of these meetings.

The following is a list of presentations to the Special Task Force and a brief description of the topics of the presentations:

- The Public Consulting Group (PCG) presented on “affinity scores” for public assistance programs. Affinity scoring involves comparing qualifying criteria for public assistance programs and creating a mathematical representation of the extent to which they overlap.
- EOHHS presented on the Integrated Eligibility System (IES). IES is a systems project which aims to integrate databases to share data among public assistance programs administered by EOHHS and create a master electronic file and data repository for such programs.
- The Massachusetts Department of Revenue (DOR) presented on current data-sharing practices and the Interagency Data Services (IDS) pilot program. DOR currently shares income and employment data with other agencies to assist with eligibility determinations for public assistance programs, and IDS is a new and more efficient way to share DOR data.
- Sana Fadel from Rosie's Place presented on the benefits of a common application and streamlined processes for verifying and recertifying eligibility for public assistance programs.
- Naomi Meyer from Greater Boston Legal Services presented recommendations for integrated access to public assistance programs and cautions against narrowing standards for programs for the sake of efficiency.
- Deborah Harris from the Massachusetts Law Reform Institute presented recommendations for aligning certain eligibility standards for assets and lump sum income, particularly for TAFDC, EAEDC and SNAP programs.

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<sup>2</sup> See Appendix B for all meeting minutes and presentations made to the Special Task Force.

- Patricia Baker from the Massachusetts Law Reform Institute presented on opportunities to use data sharing and to integrate eligibility and intake processes, particularly for SNAP and Medicaid programs.
- Ty Jones from the Center for Budget and Policy Priorities (Washington, D.C.) and Patricia Baker from the Massachusetts Law Reform Institute presented on models in other states for common applications and streamlined processes.
- Justice Ralph Gants of the Supreme Judicial Court presented on behalf of the Access to Justice Commission's Administrative Justice Task Force on the recommendation to establish a common application for both health-related and other public assistance programs.<sup>3</sup>

#### **IV. RESPONSE TO LEGISLATIVE MANDATE**

The mandate for the Special Task Force was to determine whether it is possible to develop a common eligibility standard – a single set of qualifying criteria for all state agencies administering public assistance programs. To make this determination, the Special Task Force reviewed eligibility standards and qualifying criteria for public assistance programs and found that these vary based on the type of public assistance program and the funding source for the program. Eligibility standards and qualifying criteria are based upon state and/or federal law, rules and regulations; in some instances, the standards are based on agency policy. Following this review, the Special Task Force concluded that developing a common eligibility standard for all state agencies and all public assistance programs is currently an unattainable goal.

Massachusetts does not have exclusive control over the eligibility criteria for all of its public assistance programs. (See list of public assistance programs and eligibility requirements in Appendix A.) Some eligibility criteria for public assistance programs are governed by federal regulations and requirements. For example, although the state agencies administering the SNAP program have some leeway for setting certain eligibility categories, the USDA sets the eligibility parameters for the program.<sup>4</sup> For the TAFDC program, federal and state laws and regulations determine eligibility parameters.

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<sup>3</sup> Justice Ralph Gants was sworn in as Chief Justice on July 28, 2014.

<sup>4</sup> Broad-based categorical eligibility (BBCE) is a federal option that allows states to waive the federal SNAP asset test and use a higher gross income test for most SNAP households. This makes most households below 200% of the federal poverty level categorically eligible for SNAP because they qualify for a non-cash Temporary Assistance for Needy Families (TANF) or State maintenance of effort (MOE) funded benefit. See <http://www.fns.usda.gov/broad-based-categorical-eligibility-chart>.



Eligibility factors such as age, family situation, income and assets vary from program to program. SNAP serves low-income families and individuals, including the disabled and the elderly. TAFDC serves a much smaller population of families with minor children, and the financial requirements for TAFDC are stricter than those for SNAP. Consumers who are eligible for TAFDC may be categorically eligible for SNAP, but not vice versa.

There is no single set of criteria to apply to all public assistance programs. The public assistance programs serve different purposes and originate from different funding sources. “Low-income” is defined differently across programs. While there is some overlap in criteria, there is no way to apply a single set of criteria without significant changes to federal and state laws and regulations, and without re-engineering the scope and purpose of certain programs. According to the Center for Budget Policy and Priorities, no other state has created a common eligibility standard.

While fulfilling the legislative mandate and arriving at this conclusion about the common eligibility standard, the Special Task Force considered a compelling amount of information from several stakeholders advocating for other ways to streamline eligibility processes. Accordingly, in the next sections, the Special Task Force summarizes this information and offers recommendations for further analysis and study.

## **V. REVIEW OF CURRENT ELIGIBILITY PROCESSING IN MASSACHUSETTS**

Over the past few years, Massachusetts has made significant enhancements to streamline the application processes at its agencies for many benefit programs. Many Massachusetts agencies already share documents and information. These data-sharing methods ensure that consumers who are eligible for a particular benefits program are enrolled without completing another application. For example, consumers who are deemed eligible for TAFDC and EAEDC cash assistance are automatically enrolled in MassHealth. Additionally, DTA and MassHealth share data with the Department of Elementary and Secondary Education (DESE) to identify children who are then automatically eligible for free school meals.<sup>5</sup> Also, families receiving TAFDC and children who are in the care and custody of the Department of Children and Families (DCF) are immediately placed on Medicaid through the electronic transfer of information from the DCF to Medicaid.

Another way consumers’ overall experience has been improved is by verifying their eligibility in ways that do not require additional information from individuals and families. After verifying

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<sup>5</sup> Schools are able to access information on children participating in SNAP or TANF households through the Virtual Gateway. The Virtual Gateway is also an online tool for consumers to apply for SNAP benefits and to initially assess eligibility for other public assistance programs. See <https://service.hhs.state.ma.us/ierhome/LandingPage.do?method=displayConsumerHomePage&pageSwitch=HOME>

eligibility for a public assistance program, some state agencies send participant data to other programs for which the consumers are clearly eligible. For example, DTA provides the Department of Housing and Community Development (DHCD) with the necessary information to confirm financial eligibility for otherwise qualified consumers who apply for LIHEAP. Through an expedited eligibility renewal process, certain individuals who are receiving Medicaid and SNAP have their MassHealth benefits automatically renewed using DTA's SNAP data at the time of their annual review.<sup>6</sup> However, it is important to note that the reverse is not true; when SNAP consumers need to recertify their eligibility for benefits there is no automatic recertification using MassHealth data.<sup>7</sup> This type of data-sharing among state agencies can be accomplished only when there is extensive systems development to transfer information from one public benefits database to another.

There are also initiatives under way to improve communication between Massachusetts agencies administering public assistance programs. DOR is starting to provide income and employment information through the Interagency Data Sharing (IDS) program, a portal for immediate, on-demand data-sharing with agencies administering public assistance programs.

In addition, one of the most significant initiatives underway is the implementation of an IES and development of an integrated service delivery model (also known as “no wrong door”) to allow consumers to approach any EOHHS agency to apply for a public assistance program and experience a direct connection with related programs and services. The first phase of IES is already underway. The Health Insurance Exchange/Integrated Eligibility System (HIX/IES) project is creating an integrated, real-time eligibility determination system for the Massachusetts Health Connector and MassHealth health insurance programs to ensure that individuals can readily find their way to the coverage options for which they qualify. In the second phase of IES, EOHHS reported that it is planning to extend this integrated system to determine eligibility for certain other state human services programs, but EOHHS does not yet have a timeline.<sup>8</sup>

Additionally, by virtue of a new legislative mandate, EOHHS must use IES to share eligibility data with other public assistance programs administered by EOHHS and other secretariats.<sup>9</sup> One

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<sup>6</sup> See MassHealth Bulletin #72 at <http://www.mass.gov/eohhs/docs/masshealth/bull-2012/chc-72.pdf>.

<sup>7</sup> An application for MassHealth does not create an application for SNAP.

<sup>8</sup> The timelines noted in Appendix A for implementing the second phase of IES are no longer applicable. EOHHS is working to adjust these timelines and, as of the due date of this report, EOHHS does not have a finalized adjusted timeline in place. EOHHS reported that, based on October 28, 2014 guidance from Centers for Medicare and Medicaid Services (CMS), EOHHS is evaluating options for requesting federal approval for enhancements to existing eligibility and enrollment systems integration.

<sup>9</sup> Chapter 188 of the Acts of 2014, Section 1, signed by the Governor on July 25, 2014, provides that: “Notwithstanding any general or special law, subject to appropriation, the integrated eligibility system developed by the executive office of health and human services shall allow multiple state agencies and programs to access and

of the goals of the IES initiative is to avoid asking consumers for the same information or documents repeatedly. For example, when a Medicaid applicant submits a birth certificate as documentation, this document is scanned and placed into an electronic information hub. EOHHS is planning to implement a process so that if the same consumer seeks TAFDC benefits, the birth certificate will then be available for retrieval by the TAFDC eligibility worker. The Federal government recently extended its financial support of efficient, high-functioning eligibility and enrollment systems, such as IES. Currently, Massachusetts takes advantage of federal matching funds that reimburse 90% of state spending for Medicaid eligibility and enrollment systems, and this reimbursement structure will continue to be available.<sup>10</sup>

Finally, EOHHS and DCF have developed Family Resource Centers (FRC) across the state. Each FRC provides assistance with applying for public assistance programs. Applications for TAFDC, SNAP, EAEDC and Medicaid will be scanned and submitted directly to the agency using an application “kiosk,” which will be available in the FRCs in the spring of 2015.

## **VI. ELIGIBILITY PROCESSING IN OTHER STATES**

Currently, no state uses a common eligibility standard for all public assistance programs. However, states may use different eligibility processing models to achieve streamlined eligibility processing. Most states offer a common application for multiple public assistance programs.<sup>11</sup>

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share data by creating data hubs and streamlining information processes. Through the integrated eligibility system, the department of housing and community development, housing authorities and state health and human services agencies and programs, including, but not limited to, transitional aid to families with dependent children, temporary assistance for needed families and MassHealth shall share and have access to the data. Said departments and programs shall share information regarding cases of fraud committed by recipients.”

<sup>10</sup> See Appendix B, October 28, 2014 letter from the Centers for Medicare and Medicaid Services.

<sup>11</sup> As of 2012, 44 states offered a type of common application (see [http://www.fns.usda.gov/sites/default/files/10-State\\_Options.pdf](http://www.fns.usda.gov/sites/default/files/10-State_Options.pdf)). Within these 44 states, some of the programs are administered by the same agency, so the common application does not involve multi-agency collaboration and coordination. Justice Gants (now Chief Justice) informed the Special Task Force that a common application allows residents “to apply for various public benefits by filing a single application” and helps relieve families and individuals in need of assistance from “the burden of filing multiple applications for different public benefits with different public agencies, while the state is spared the considerable administrative expense of processing multiple applications and of making multiple eligibility determinations for the same applicant.” See Appendix B, Presentation by Justice Ralph J. Gants to the Task Force on State Verification and Eligibility, March 6, 2014; for examples of common applications utilized by other states, see also: <https://dhhs-access-neb-menu.ne.gov/start/application/publik/eapp/Welcome.xhtml?tl=en> and <https://dhhs-access-neb-menu.ne.gov/start/?tl=en> (Nebraska “common application”); <https://jobs.utah.gov/mycase/#> (Utah “common application”); <https://access.wisconsin.gov/access/> (Wisconsin “common application”).

Through common applications, these states provide a convenient and efficient way for consumers to apply for a variety of public assistance programs at the same time (such as food assistance, cash assistance and Medicaid), while allowing public assistance programs to apply different eligibility standards that are appropriate for their purposes and their funding sources.

Massachusetts is one of the few states that does not offer such a common application to consumers as it has concentrated its efforts on other ways to improve the consumer's experience without adding responsibilities, such as paperwork, on the consumer.<sup>12</sup> The Special Task Force considered five presentations (as listed in Section III above) which recommended that Massachusetts develop and implement a common application and reviewed examples of common applications from other states.

There are twenty states that allow consumers to complete an online or paper application for benefits programs such as Medicaid, Children's Health Insurance Program (CHIP), SNAP, Child Care, TANF and General Assistance (similar to EAEDC in Massachusetts), even though different agencies administer these benefits.<sup>13</sup> Examples of other benefits included in common applications are LIHEAP, Medicare Prescription Advantage, state-only cash assistance, homelessness prevention assistance, and other nutrition programs. It is important to emphasize that these common applications include some, but not all, public assistance programs, and take into account the different requirements of federal and state laws, rules and regulations.<sup>14</sup>

Some states utilize a different type of common application that involves a direct request for certain public assistance programs, along with eligibility screening for other programs. Applications with such eligibility screening are available on approximately twenty-four state websites.<sup>15</sup> In these states, benefit screeners and online calculators use consumers' answers to

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<sup>12</sup> According to the USDA State Option Report 2012, Massachusetts was 1 of 8 states in 2012 that did not offer an integrated eligibility program. See [http://www.fns.usda.gov/sites/default/files/10-State\\_Options.pdf](http://www.fns.usda.gov/sites/default/files/10-State_Options.pdf) at page 23. As noted above, Massachusetts does provide an online tool for consumers to assess eligibility through a "Virtual Gateway", which provides for an initial screening of applicants, but does not send the consumer's data for processing. This is not a common application.

<sup>13</sup> These states are Arkansas, Colorado, Delaware, Georgia, Idaho, Iowa, Louisiana, Maine, Maryland, Michigan, Minnesota, Nebraska, New Hampshire, New York, North Dakota, Oklahoma, Pennsylvania, Utah, Virginia, and Washington.

<sup>14</sup> Center for Budget and Policy Priorities, "Online Services for Key Low-Income Benefit Programs: What States Provide Online with Respect to SNAP, TANF, Child Care Assistance, Medicaid, and CHIP" (May 6, 2014), <http://www.cbpp.org/cms/index.cfm?fa=view&id=1414>.

<sup>15</sup> *Id.* These states include Arkansas, Colorado, Delaware, Georgia, Iowa, Maryland, Michigan, Nebraska, New Jersey, New York, Pennsylvania, Vermont, Virginia, Washington Delaware, Maryland, Michigan, and Pennsylvania, Florida, Montana, Ohio, Tennessee, Texas, and West Virginia; Center for Budget and Policy Priorities.

several questions about income and household circumstances to determine potential eligibility for various public assistance programs.<sup>16</sup>

## **VII. CONSIDERATIONS FOR FURTHER STUDY AND ANALYSIS**

After reviewing the compelling information presented by various stakeholders and understanding the changes related to eligibility processes that have taken place or are underway in the Commonwealth, the Special Task Force determined that further study and analysis would be required to fully assess the costs and benefits of options for further streamlining eligibility processes, such as promoting additional data-sharing among agencies and pursuing a common application. The Special Task Force identified the following considerations:

- A. Technology challenges: Technology modifications are a significant obstacle to implementing any systemic eligibility and verification changes. Technology changes may require:
  - 1. Aligning different, complex information technology (IT) systems across agencies, which is particularly challenging for agencies and programs that do not share a critical level of commonality in programmatic goals and populations;
  - 2. Coordinating IT workflows and chains of command among and between various agencies and state programs;
  - 3. Maintaining and consistently updating any technology solution due to changing underlying technological capabilities and system requirements;
  - 4. Significant and complex “behind-the-scenes” programming for all stages;
  - 5. Training for staff on any new consumer intake process; and
  - 6. Sufficient resources (e.g., funding and staffing) to ensure successful implementation of all of the above.
- B. Privacy issues: Data-sharing activities must take into account consumer privacy considerations. The Administration for Children and Families recently offered guidance on how to approach data-sharing with respect to federal programs.<sup>17</sup> Applications for public benefits may require information about domestic violence, disabilities, children with disabilities, and child abuse, among other sensitive information. Systems and

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<sup>16</sup> *Id.*

<sup>17</sup> See the Administration for Children and Families’ “Confidentiality Toolkit” at [https://www.acf.hhs.gov/sites/default/files/assets/acf\\_confidentiality\\_toolkit\\_final\\_08\\_12\\_2014.pdf](https://www.acf.hhs.gov/sites/default/files/assets/acf_confidentiality_toolkit_final_08_12_2014.pdf) and August 19, 2014 Press Statement regarding state and local data sharing efforts at <http://www.acf.hhs.gov/news/state-and-local-efforts-now-have-a-toolkit-to-improve-responsible-data-sharing>.

processes for determining and verifying eligibility must have the proper safeguards to protect such sensitive information. Agencies administering benefit programs may share data only after notifying the consumer of possible associated risks, and only with authorized parties for authorized purposes.<sup>18</sup> It may be appropriate to develop processes for informing consumers of the data-sharing consequences of filing an application, so that each consumer can assess the risks of doing so.

- C. Data discrepancies: A streamlined application process may cause processing problems. If a consumer and/or caseworker makes an error on the initial application (such as inputting an incorrect personal identifier), that single mistake could cause benefit delays in more than one program. On the other hand, the use of a common application and integrated systems support may create opportunities for internal controls to reduce inconsistencies.
- D. Fiscal impacts: There are several general cost categories related to the IT obstacles outlined above, such as IT infrastructure and other equipment, as well as IT programming and maintenance. In addition, there could be costs for cross-training among agencies and potential adjustments to collective bargaining agreements if staff who work on program eligibility take on new responsibilities. In certain instances, collectively bargained agreements designate which state employees can determine benefit eligibility for certain programs (e.g., only DTA caseworkers can determine eligibility for DTA program benefits).

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<sup>18</sup> G.L. c. 66A, the Fair Information Practices Act (FIPA) mandates safeguards on data-sharing among state agencies and requires either statutory or regulatory authority, or approval from the consumer, to do so. Executive Order No.528, Section 4 (2011) requires that benefits applicants consent to the disclosure of tax data by DOR in order to verify eligibility. Effective July 7, 2014, St. 2014, c. 158, sec. 16 amended G.L. c. 62C, sec. 21(b) to authorize DOR to disclose data for applicants and members of applicants' households, provided that the state agency administering the benefits certifies that such data is required to confirm eligibility.

## **VIII. RECOMMENDATIONS**

The Special Task Force recommends the following:<sup>19</sup>

- A. Massachusetts should continue to pursue potential options, such as IES, to streamline eligibility processing and address barriers that keep eligible individuals from obtaining and retaining benefits.<sup>20</sup>
- B. Massachusetts should continue to explore using a common application for public assistance programs, including looking at best practices of other states, evaluating the pros and cons of a common application and the costs of development and implementation. This review would include assessing the fiscal impacts of streamlining eligibility processes and using a common application, and how other states have evaluated the resources needed to facilitate changes, including the use of consultants.
- C. Massachusetts should continue to explore data-sharing in order to improve eligibility processing, the integration of eligibility processes and the verification of eligibility by state agencies. The exploration of data-sharing would not only include developing master data management (MDM) systems to properly match client data and looking for efficiencies but also protecting personal information.
- D. Massachusetts should review laws, regulations, policies and rules regarding eligibility standards for public assistance programs in order to identify opportunities to improve application processes, including possibly aligning eligibility standards across public benefits programs when it is feasible and efficient to do so.

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<sup>19</sup> This is not intended to be an exhaustive list of areas that may warrant further exploration. Please see, e.g., U.S. Department of Housing and Urban Development, Office of Policy Development and Research, “Strategies for Improving Homeless People’s Access to Mainstream Benefits and Services,” March 2010, <http://www.huduser.org/portal/publications/pdf/StrategiesAccessBenefitsServices.pdf> for other areas that have been explored to date. As a further example, see the Request for Proposals 2014 by the Benefits Data Trust seeking to streamline SNAP enrollment for seniors at <http://www.bdtrust.org/uploads/medium/file/239/rfp-2014-7-18.pdf>. See, also, “Improving Access to Public Benefits, Helping Eligible Individuals and Families Get the Income Supports They Need” by the Annie E. Casey Foundation, the Ford Foundation, and the Open Society Institute, April 1, 2010, accessible at <http://www.aecf.org/resources/improving-access-to-public-benefits/>.

<sup>20</sup> For example, eliminating the asset and lump sum tests for cash assistance programs (TAFDC and EAEDC, specifically) to align cash benefits with other benefit programs could help to reduce barriers to those benefits and streamline the application process.

- E. As part of an overall review of eligibility processes, including streamlining such processes, Massachusetts should consider the risk of fraud and ways to prevent and detect fraud.
- F. Massachusetts should consider forming a coordinating committee with staff to address the above issues and other public assistance eligibility issues. Members of the committee should include representatives from agencies with responsibility for information technology and administration of public assistance programs such as:

The Commonwealth Chief Information Officer (CIO) or a designee; the Secretary of Health and Human Services or a designee; the Commissioner for the Department of Transitional Assistance or a designee; the Commissioner for the Department of Public Health or a designee; the Director of MassHealth or a designee; the Secretary of Veterans' Services or a designee; the Commissioner for the Department of Early Education and Care or a designee; the Commissioner for the Department of Elementary and Secondary Education or a designee; the Department of Housing and Community Development or a designee; the Secretary of Administration and Finance or a designee; the Inspector General or a designee; representatives of recipients of public benefits; and other stakeholders deemed relevant.

## **CONCLUSION**

In response to the legislative mandate, the Special Task Force studied public assistance programs to determine whether it was possible to develop a common eligibility standard for all agencies to apply as they determine eligibility for and administer such programs. The Special Task Force found that developing and applying a common eligibility standard to all public assistance programs is currently an unattainable goal due to federal and state funding sources and differing eligibility factors. However, various changes are underway in the Commonwealth to improve eligibility processing, and the Special Task Force reviewed other potential options for further streamlining eligibility processes and outlined issues to help guide additional study and analysis of these options. Moving forward, the Special Task Force recommends that policy makers consider initiating this further study and analysis so that Massachusetts can review and implement best practices for simplifying and building efficiency into eligibility processes.

## **ACKNOWLEDGEMENTS**

The Special Task Force would like to thank the Legislature for the mandate and the opportunity to study verification and eligibility processes. In addition, the Special Task Force thanks the presenters and stakeholders who contributed to this study.