

# Benefits Access in New York City

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LL60 of 2018 Report



## Introduction

In New York City, an individual or household may be eligible for numerous benefits and services that have been established under Federal, State or City authority to provide support for housing, education, food, utilities, and other necessities. These benefits and services play a critical role in the well-being of New Yorkers, and reflect the collective value we place on the importance of basic economic stability. According to a report from the Obama Administration, safety net programs lifted 45 million people from poverty in 2012, and between 1968 and 2012 these programs prevented 1.2 billion “person years”<sup>1</sup> from living below the poverty line.<sup>2</sup> The receipt of public benefits has been shown to improve health, educational outcomes, employment rates, and earnings.<sup>3</sup>

In an effort to connect more New Yorkers to key benefits and services, Council Member Ben Kallos introduced new legislation, which went into effect as Local Law 60 (“LL60”) in January, 2018. A number of possible barriers can prevent New Yorkers from receiving the services to which they are entitled. For example, residents may be unaware that they qualify for specific benefits; find an application process daunting; struggle to produce documents required to demonstrate eligibility; or, inadvertently miss recertification deadlines and become dis-enrolled. Leading up to the passage of LL 60, CM Kallos emphasized that evolving technologies could provide new solutions to these longstanding challenges.

Specifically, Local Law 60 of 2018 requires the Mayor’s Office of Operations (Operations) to study the feasibility of using administrative data to identify New Yorkers who may be eligible for particular benefits and inform those New Yorkers of their potential eligibility. LL60 also requires Operations to:

- Assess City agencies’ ability to use administrative data to determine likely qualification for other benefits using screening tools;
- Assess potential means to notify individuals of the possibility of their benefit eligibility;
- Assess the technical ability to produce pre-filled applications for potentially eligible clients, or to include a link to pre-filled renewal applications;
- Address the implication of enabling individuals to decline receiving paper applications or renewals;
- Consider implications of notifying people of likely eligibility that, if claimed, may affect eligibility for other benefits; and,

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<sup>1</sup> A “person year” is a measurement that takes into account the number of people and the amount of time. For example, a study that follows 100 people for 100 years would contain 100 person years of data.

<sup>2</sup>The Executive Office of the President of the United States, The Council of Economic Advisors. (2014, January). *The War on Poverty 50 Years Later: A Progress Report*. Retrieved from [https://obamawhitehouse.archives.gov/sites/default/files/docs/50th\\_anniversary\\_cea\\_report\\_-\\_final\\_post\\_embargo.pdf](https://obamawhitehouse.archives.gov/sites/default/files/docs/50th_anniversary_cea_report_-_final_post_embargo.pdf)

<sup>3</sup>Center on Budget and Policy Priorities. (2018). *Chart Book: SNAP Helps Struggling Families Put Food on the Table*. Retrieved from <https://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table>.

- Identify additional options for helping people complete public assistance applications (online, phone, in-person).

The resulting study has spurred a systematic review of various benefits access initiatives within different City agencies or offices, thereby creating an opportunity to streamline efforts, extend what is working, and explore new ideas. This report presents Operations’ findings, as well as a set of recommendations for the next phase of efforts to expand benefits access. As this report explains, administering benefits occurs within a complex landscape, governed primarily by laws and regulations established at the state and federal level. New York City’s ability to make changes to its practices is often subject to approval at other levels of government. Aside from the regulatory constraints, technological innovation within the City must also account for the interdependence on state technical infrastructure, legacy systems in place within agencies, and existing operational processes that manage benefits delivery at scale.

While meaningful constraints exist, New York City has already taken significant steps to improve access to benefits in recent years, and in many ways serves as a national leader in helping residents discover and enroll in benefits programs for which they are eligible. The mandate of LL 60 has pushed the City to consider how it might do even more, and this report recommends several new benefits access strategies to explore:

1. Explore the feasibility and value of targeted outreach to residents likely eligible for specific benefits utilizing ACCESS NYC’s eligibility rules engine by using existing data-sharing agreements, and expand data-sharing to additional agencies to facilitate new outreach and enrollment efforts.
2. Identify opportunities through existing outreach and interactions with residents to share information about benefits more comprehensively.
3. Assess the value of creating a Digital Application Service to accelerate additional online applications by offering support and design tools to agencies that are examining the feasibility of online applications.
4. Where within City jurisdiction, agencies should explore the feasibility and value of simplifying renewal and determination processes by taking advantage of existing benefits linkages and exploring new collaborations.
5. Pursue legislative advocacy to enable additional local strategies.

These recommendations build on the work that has been underway during the administration of Mayor de Blasio. Efforts to expand and simplify benefits access are part of the City’s overall commitment to promote equity and opportunity for all New Yorkers. In 2015, the City’s strategic plan, “One New

York: The Plan for a Strong and Just City” set forth the Administration’s commitment to improving coordination of City resources and services across agencies to ensure that all residents receive the “right services at the right time.”<sup>4</sup>

The digital “front door” of information about the benefits available to New York City residents is ACCESS NYC, the City’s online screening and information tool managed and recently redesigned by the Mayor’s Office for Economic Opportunity (“NYC Opportunity”). The ACCESS NYC screening tool allows individuals to determine the City, State, and Federal benefits for which they are potentially eligible to enroll, along with information regarding the enrollment processes and application methods, written in plain language, in eleven languages. Its mobile friendly, award-winning<sup>5</sup> design allows users to enter basic household information and get guidance on the potential eligibility for over 30 programs and benefits. About 65,000 people use ACCESS NYC each month. ACCESS NYC does not make a final determination about an individual’s eligibility; that work is done by the respective agencies that administer specific benefits.

In New York City, the Department of Social Services (DSS), which includes the Human Resources Administration (HRA) and the Department of Homeless Services (DHS), administers most of the significant safety net resources, including Cash Assistance, the Supplemental Nutrition Assistance Program (SNAP), elements of Medicaid, the Home Energy Assistance Program (HEAP), and others. DSS has been actively engaged for several years in a major benefits reengineering effort. Benefits reengineering has removed real barriers to access and created a self-directed service model for clients, permitting SNAP applicants and clients to conduct a broad range of transactions with DSS/HRA without the burden of having to physically come to an HRA office. These changes include an online application for SNAP; on-demand eligibility phone interviews; an online portal that gives clients access to over 100 case-specific points of information in real-time, including application statuses, upcoming appointments, account balances, and documents requested for eligibility determinations; and the launch of an HRA mobile application. Building on this progress in modernizing SNAP systems, DSS/HRA has begun to integrate technological improvements in its Cash Assistance program to similarly improve the client experience subject to State approval.

Many of DSS’s innovations are cited as national models. Its agency-specific mobile app “ACCESS HRA,” has garnered industry recognition.<sup>6</sup> ACCESS HRA provides clients with immediate mobile-responsive access to HRA-only case information and allows them to better manage their cases by

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<sup>4</sup>The City of New York. *One New York: The Plan for a Strong and Just City*. (2015). Retrieved from <http://www.nyc.gov/html/onenyc/downloads/pdf/publications/OneNYC.pdf>. Accessed 11/1/18.

<sup>5</sup>Access NYC Receives Award for “Best Application Serving the Public.” (September 22, 2017). *Mayor’s Office of Economic Opportunity*. Retrieved from <https://www1.nyc.gov/site/opportunity/news/013/access-nyc-receives-award-best-application-serving-public-#0>

<sup>6</sup>Grenslitt, Janet. (2018, September 20). Best of New York Awards 2018 - Winners Announced. *Center for Digital Government*. Retrieved from <http://www.govtech.com/cdg/best-of-new-york/Best-of-New-York-Awards-2018---Winners-Announced.html>

having immediate access to case details and submit required documents from their smartphones. DSS also introduced a number of additional innovations designed to facilitate better access to benefits, that include, among others: a new set of targeted screening and outreach efforts; behavior-based notifications to encourage clients to recertify online and avoid losing benefits; and new procedures that allow clients to complete federally required SNAP enrollment interviews on-demand, rather than being assigned a four-hour window as was required previously. As a result of these efforts, NYC now has an 84% Program Access Index for SNAP, compared to the national average of 75%.<sup>7</sup>

Other meaningful advances to benefits access in NYC launched in recent years include:

- The launch of free Pre-K and 3-K for All, including online and in-person application and outreach opportunities;
- The creation of the Mayor’s Public Engagement Unit (“PEU”), specifically designed to conduct outreach by meeting residents where they are. PEU-led initiatives include health insurance enrollment (“GetCovered”), outreach about rent freeze options (such as the Senior Citizen Rent Increase Exemption, or SCRIE), and efforts to find permanent housing for homeless clients;
- Outreach about potential Earned-Income Tax Credit (EITC) eligibility, along with Free Tax Prep Services;
- The creation of HOME-STAT, which partners existing homeless response and prevention programs with new innovations designed to better identify, engage, and transition homeless New Yorkers to appropriate services and, ultimately, permanent housing; and
- The launch of StreetSmart, which is the application used to record engagement and support of street homeless clients.

Even in light of this major progress, there are still challenges that may prevent New Yorkers from accessing key benefits. Navigating the many program and service offerings available in New York City can be confusing, especially for households seeking to access multiple kinds of resources. Each of these programs has its own eligibility and enrollment processes and requirements, many of which are mandated by federal or state law, and each can require completing a complex application, submitting a variety of documents, and in some cases completing an in-person or phone interview. Moreover, enrollment in one program may affect benefits received from another. In New York City, while DSS administers most safety net resources, the management of other benefits and services is decentralized and important programs are administered by a variety of other departments.

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<sup>7</sup>As of May 15, 2018. The Program Access Index “is a simple index of the average monthly number of SNAP participants over the course of a calendar year to the number of people with income below 125 percent of the official poverty line.” See USDA. (2018). *Calculating the Supplemental Nutrition Assistance Program (SNAP) Program Access Index: A Step-By-Step Guide*. Retrieved from <https://www.fns.usda.gov/snap/calculating-supplemental-nutrition-assistance-program-snap-program-access-index-step-step-guide>.

In this context, it is imperative for New York City to continue to identify new strategies for improving benefits access. Modern technology and new capabilities in data management allow for new ways to enhance and simplify the experience of discovering, applying for, and enrolling in relevant services and benefit programs. This report aims to surface promising and feasible opportunities, and to specify next steps that New York City can take to keep at the forefront of ensuring residents receive the support and resources to which they are entitled.

In Section I of this report, we describe the collaboration we undertook with a variety of City agencies that provide key benefits, as well as those that have touch points with clients who may be eligible for benefits that are managed by other agencies. Section II provides a thorough discussion of legal, technical, and programmatic considerations that provide critical context for understanding the scope of the need and challenges related to expanding benefits access. Section III discusses the landscape of existing benefits linkages, the concept of “automatic” benefits enrollment, and the significant challenges to pursuing this approach at a local level. Section IV examines the benefits application process through a user experience lens. Finally, Section V presents a set of recommendations for New York City to consider in continuing efforts to improve benefits access for the City’s residents.

## **Section I: Process and Methodology**

The Mayor’s Office of Operations (Operations) and the Mayor’s Office for Economic Opportunity (NYC Opportunity) produced this study. A broad array of agencies contributed to its findings, including DSS; the Department of Finance (“DOF”); the Administration for Children’s Services (“ACS”); the Department of Small Business Services (“SBS”); and the Department of Housing Preservation and Development (“HPD”). A number of additional agencies participated in collaborative working sessions which helped to generate the recommendations in this report.

NYC Opportunity, a part of Operations, served as the study lead. In addition to the agencies named in the legislation,<sup>8</sup> NYC Opportunity sought to engage other City agencies administering key benefits or interacting with a large client base, as well as agencies with expertise in benefits administration, outreach, and data policy. The table below indicates participants in our study, and outlines their roles.

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<sup>8</sup> Agencies named in the legislation are DSS, DOF, ACS, SBS, and HPD.

Office	Project Responsibility
<b>Participating Agencies</b> ACS, CUNY, DOE, DOF, DSS-HRA-DHS, DYCD, HPD, NYCHA, SBS	Data managers and owners; Benefits/Program administrators; Content experts; Co-develop recommendations; Review reports
<b>Advising Agencies</b> DOITT, DMHHS, CIDI, MODA, PEU	Advise on report content and recommendations
<b>Mayor’s Office for Economic Opportunity</b>	Research lead; Project oversight; Co-develop recommendations
<b>Chief Privacy Officer / General Counsel for the Mayor’s Office of Operations</b>	Legal analysis and input in collaboration with agency counsel as appropriate
<b>Mayor’s Office of Operations</b>	Project management; Meeting facilitation; Analysis

Across the course of this study, NYC Opportunity conducted 17 interviews with 88 individuals representing 8 agencies. It also held two large collaborative working sessions, one with 18 participating agencies and offices and the other with 13 participating agencies and offices.

Many City agencies are already undertaking major efforts to expand benefits access, independently or in collaboration with each other or with State agencies. With this in mind, the study was designed around a core question: *“How might we advance benefits access, by responsibly, lawfully, and thoughtfully building on the work and systems that already exist?”*

The study also considered critical factors such as client experience, the intended outcomes of any policy or program, operational considerations, legal/privacy requirements, and technical capabilities. Finally, we aimed to identify opportunities to coordinate and maximize the use of City resources.

Our study included the following elements:

- **Review** of local, state, and national efforts to expand and automate benefits access;
- **Assessment** of current benefits access, outreach, and enrollment efforts at NYC offices and agencies;
- **Interviews** with programmatic, technical, and legal staff at participating agencies, to learn more about agency priorities, current efforts, goals for the future, and concerns;
- **Workshops** to generate ideas and validate recommendations with all study participants; and
- **Analysis** of eligibility and enrollment requirements for a subset of key benefits.

## Section II: Key Factors for Expanding Benefits Access

As required by LL 60, Operations assessed the legal and technical feasibility of expanding the City's efforts to screen individuals for likely eligibility for benefits and services; notify those individuals about their potential eligibility; offer pre-filled applications (on paper or online); and provide assistance to residents who choose to apply. This section outlines important legal and technical factors that have the greatest impact on City agency efforts and ability to expand benefits access, and adds a third lens: programmatic feasibility, or the impact that significant changes to benefits enrollment tactics would have on agency operations.

### A. Legal feasibility

**Privacy Considerations and the Citywide Data Integration Framework.** We considered the legal ramifications of using personally identifiable information to screen individuals or households for eligibility for benefits to which they did not apply. Personally identifiable information (PII) is information that can be used to distinguish or trace an individual's identity or locate a person, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.<sup>9</sup> Just as there are complex federal, state, and local requirements for eligibility and enrollment in a particular benefit, there are also specific laws and regulations which govern when and how personally identifying information may be used and shared among and between City agencies for purposes of benefits enrollment. City agencies may also receive personally identifiable information from other federal, state, or city entities through legal agreements that restrict the re-disclosure of such information.

While privacy laws and regulations generally do not *preclude* the disclosure of identifying information to another City agency for the purpose of benefits enrollment, either the individual's prior written consent must be obtained, or a law or legal exception must apply that authorizes the disclosure, and, in some instances, prior written authorization by a state or federal oversight agency is required. When determining whether a disclosure is permissible, agency counsel must conduct a fact-dependent legal analysis of the proposed disclosure which includes examining the type and source of the information, the specific data elements to be shared, the purpose of the disclosure, and applicable law.

As examples, federal and State laws and regulations may permit HRA to disclose some of a Cash Assistance recipient's identifying information to another City agency for purposes relating to the administration of public assistance, which may include provision of services to recipients (such as benefits enrollment support). In contrast, social services law permits ACS to disclose certain child welfare

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<sup>9</sup> OMB Memorandum M-10-23 (June 25, 2010).



information outside of the agency only under very limited circumstances, to certain enumerated persons and entities. In most instances, written approval of the disclosure by ACS's oversight agency, the NYS Office of Children and Family Services, is generally required. Moreover, sweeping legislation recently enacted by the New York City Council established comprehensive requirements that restrict the collection, disclosure, and retention of personally identifying information by NYC agencies and offices unless one of a limited number of exceptions applies, adding to the challenge of interagency data sharing involving identifying information.<sup>10</sup> The new local privacy law does not impose an absolute bar on sharing identifying information, however, but rather establishes an agency privacy officer and chief privacy officer role to ensure that, absent exigent circumstances, the appropriate level of legal review and authorization has been secured, in accordance with applicable federal and state law.

Finally, there are types of personally identifiable information that require heightened scrutiny because the use and disclosure of such information is subject to a number of legal restrictions imposed by numerous federal, state and local laws. For example, an individual's health information may be subject to restrictions under federal and state Medicaid laws and regulations, including the Health Insurance and Portability and Accountability Act (HIPAA) and the New York State Public Health Law, respectively, and there are other laws and regulations restricting disclosure of an individual's mental health, alcohol and substance use and HIV-AIDS information.

Notwithstanding legal privacy challenges, the City recognizes the importance of responsible data sharing among City agencies to implement key initiatives that advance equity and opportunity for New Yorkers. As such, in 2015, the Mayor's Office of Operations developed—and currently manages—a legal framework for facilitating multi-agency data sharing projects: the Citywide Data Integration Initiative. This initiative, memorialized in a master legal agreement signed by 47 City agencies, sets forth a structured legal process and stringent privacy protection and security protocols for data sharing and data integration projects involving personally identifiable information. This framework requires a review of the permissibility of data sharing that may be case-specific or limited to certain exceptions to confidentiality rather than a general allowance of disclosure.

In reviewing data-sharing proposals under the Citywide Data Integration Initiative framework, relevant agency attorneys painstakingly identify the laws, regulations, and legal exceptions that govern *each* data element requested, to determine whether the requested information can be lawfully shared with another agency or entity for the proposed purpose. Legal resource guides, such as the Administration for Children & Families (ACF) Confidentiality Toolkit—a product of the ACF Interoperability Initiative<sup>11</sup> detailing the federal and state laws and regulations relevant to the sharing of health and human services

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<sup>10</sup> N.Y.C. Admin. Code §23-1201 – 1205 and N.Y.C. Charter §8(h)

<sup>11</sup> See [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).

data—can be helpful in facilitating efficiency in legal research, and finding legal pathways to authorize interagency data exchange. The Toolkit also provides helpful examples of where benefit eligibility systems may interact, such as for SNAP, which requires a joint application process with New York’s Temporary Assistance for Needy Families program to reduce application burdens on households.<sup>12</sup>

The Citywide Data Integration Initiative framework has already supported successful benefits outreach efforts, including those for Pre-K and 3-K for All; EITC and free tax prep services; SCRIE; HOME-STAT services for street homeless individuals; and a number of initiatives led by the Public Engagement Unit, such as GetCoveredNYC, a citywide health insurance enrollment project.

**Federal, State, and Local Jurisdictions.** Many benefits enrollment processes are governed by federal or state law, limiting New York City’s discretion to modify the experience for the applicant. For example, SNAP is governed by the Food and Nutrition Service within the United States Department of Agriculture, which governs benefits levels as well as application and eligibility requirements. In order to modify any of these requirements to meet the specific needs of a population, a local government must apply to the USDA for an official waiver allowing for a change. In some cases, New York City has successfully advocated for waivers. For example, enrollment in SNAP has a required interview component. Previously, clients could go to an HRA center and wait to be called for an in-person interview, or receive a four-hour window when they might receive a phone call for their interview at any moment. HRA has obtained a federal waiver from the USDA, which oversees SNAP administration, permitting on-demand, by-phone SNAP interviews, allowing New York City residents to conduct their interview at a time and place that works for them. Additional benefits access reforms will require additional approvals outside of the City’s control.

## **B. Technological Feasibility**

To assess the technical issues associated with multi-benefit applications we considered the feasibility of three key functions: 1) the ability to modify existing systems to determine eligibility for programs other than those for which they were originally developed, and to auto-fill applications; 2) the ability to extract personally identifiable information from the administrative data held by existing IT systems (in accordance with applicable laws and regulations) in order to screen, verify eligibility, and notify residents outside of the system where the data is held; and 3) the ability to use data collected from one program for the purpose of screening and determining eligibility for other programs.

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<sup>12</sup> *Id.*, at 43.

In evaluating these technical possibilities, we identified foundational challenges that present potential barriers to benefits access expansion. Among the most critical: disparate approaches to collecting and defining data elements across the City; restrictions to modifying State and Federally owned systems; and, legacy platforms that are unable to accommodate data exchanges that might be possible in more modern systems.

**Lack of Standardization.** Among City agencies, there is no existing standardized way to collect and store client data. Often, approaches to data governance, collection and definition can vary significantly across agencies, programs, and systems, which presents challenges for using information from one system to screen clients for another purpose, and even greater challenges for pre-filling applications.

**Mandated Systems.** The City's reliance on State and Federally owned systems to deliver services presents a second challenge. A number of critical data systems used by City agencies to administer benefits are built and owned by other jurisdictions, particularly New York State. Within these systems, the City has limited control over what data is recorded and how it is recorded and organized. ACS, for example, is mandated by the New York State Office of Children and Family Services ("OCFS") to use CONNECTIONS as its primary client management system and system of record for child welfare services. CONNECTIONS is managed by OCFS, which has oversight of changes to CONNECTIONS and determines whether to accept or decline requests made by ACS, based on its own strategic and technical objectives. Changes to legacy systems may be further prohibited by policy and regulatory directives. HPD, for example, uses a third-party vendor solution for its Section 8 program that is specifically designed to integrate and manage data in accordance with HUD reporting requirements. (See textbox about New York State's Integrated Eligibility System for a further example of a crucial State-managed client data system.)

**Legacy Platforms.** Systems used for some of the City's largest social service programs are housed on older, legacy platforms that cannot be easily changed to support modern approaches to benefits access. Through our study, agencies described the amount of time and manual effort often required to prepare data for exchange or matching. In some instances they described producing multiple versions of a report each day in order to align with different agency systems. For example, HRA uses the Welfare Management System (WMS), which is a mainframe COBOL system managed by the New York State Office of Temporary and Disability Assistance (OTDA). The age of these systems predate modern methods of data exchange and integration. To take data from one of these systems and share with another

requires complicated extraction processes, requiring staff to use highly specialized and often obsolete skills on the outdated technology. Data exchanges between agencies are almost always completed via “flat file” transfer (i.e., exporting a .csv or other spreadsheet file), rather than through true system integration - requiring staff with facility in programming languages to produce and share files. Flat file exchanges must be done at scheduled intervals, rather than in “real time.”

Another consequence of the age of existing systems is that they may not be built to accommodate a public-facing interface. Agencies interested in moving benefit applications online must not only develop a client-facing form, but also develop processes to efficiently integrate that form with the processes, workflow and back-end systems used by agency staff to manage submissions. For example, under a previous DOF SCRIE/DRIE online application pilot (described below), when applications were submitted online, DOF had to print the applications and then process them as they would paper applications. Moving the application online provided an important convenience for clients, but created a new inefficiency for the administering agency

While challenges exist, City agencies have invested significant resources to overcome information barriers to enhance service delivery and coordination. A flagship example of such efforts is the Worker Connect initiative launched in 2010. Worker Connect is a system that allows case workers to review client information and documentation verified by those clients’ participation in a select set of City benefits programs. This initiative is supported by a legal framework that allows for limited data sharing for the provision of social services to individuals and families.

### **New York State Integrated Eligibility System**

New York State is developing a major redesign of the systems and business processes that support the provision of public benefits and services. The Integrated Eligibility System Program was established with a mission to enhance the well-being of New Yorkers by transforming health and human services delivery through coordinated business practices, modernized technology, and strategic partnerships. A key output for this program will be the implementation of the Integrated Eligibility System (IES). According to New York State, the solution will provide clients with a seamless, integrated, “no-wrong-door” approach to application and enrollment for health and human services benefits. It will allow workers and service providers to view clients holistically, better tailor services to their specific needs and identify at-risk persons in a timely fashion. To accomplish these goals, IES is working to modernize and integrate health and human services business processes and IT systems, including the Upstate and NYC Welfare Management Systems (WMS) and the Benefits Issuance Control System (BICS), and to assess additional legacy systems for inclusion. As of early 2019, the

program is rolling out a series of early demonstration projects to be piloted at several social service districts across the state. In the program's next phase, the State team will begin laying the groundwork for some of the foundational processes and enabling technologies that will support the new system, including a program governance framework, policy and legal review, common client index and data preparation.

### **Study Regarding Interoperability of Client Information Management Systems for Social Services (Local Law 75 of 2018)**

A separate local law (LL75 of 2018) requires Operations to produce another study related to administrative data and social service delivery. LL75 requires Operations to conduct a study about client information management systems used by City agencies. Because these "client information systems" are an important source of the administrative data which LL60 proposes using for benefits screening, we view these two studies as closely connected. The specific requirements of LL75 are as follows:

- Assess efforts to update and integrate client information management systems;
- Recommend strategies to facilitate information sharing to support inter-agency social service;
- Examine how agencies can use digital tools for:
  - Applications
  - Electronic document uploads
  - Text message updates/reminders
  - Electronic notification of available services;
- Consider potential technology investments;
- Recommend upgrades to client information management systems; and,
- Recommend approach for ongoing monitoring/evaluation of the quality of client information management systems.

As with this benefits access report, the report mandated by LL75 explore concepts related to data systems, legal frameworks for interoperability. It will be completed in Spring 2019, with annual updates required through 2022.

### **C. Programmatic Feasibility**

Our study also examined ways that benefits application data is currently collected and processed, and considered how new screening, application, verification, or enrollment strategies could affect the

administration of these benefits. We also considered the programmatic implications of using administrative data collected for one purpose to be used in addition for the purpose of benefits screening or enrollment.

**Data Quality and Application Workflow.** In addition to the technical challenges of extracting data from one IT system and using it for another purpose, there are also issues related to the accuracy, completeness, and timeliness of data. Past attempts in New York City to automate benefits access – for example, by linking a low-barrier screener to formal applications – have had limited success. In an earlier version of ACCESS NYC, NYC Opportunity and the NYC Department of Finance conducted a pilot that allowed New Yorkers to complete applications for the Senior Citizen Rent Increase Exemption (“SCRIE”) or the Disability Rent Increase Exemption (“DRIE”) online via the ACCESS NYC website. DOF reported that many applications submitted through this route were incomplete, which required agency staff to use internal systems to attempt to complete and verify information. Once agency staff attempted to validate the data, it was determined that a large number of applicants were not eligible for the service. Indeed, using data submitted as part of a screener is rarely appropriate for an actual benefits application. ACCESS NYC is intentionally designed to require a low barrier to entry, so anyone can complete it quickly and make an informed decision about benefits for which they may wish to apply.

Beyond screening data, the information collected for enrollment in one program may be missing elements required to utilize it for another purpose. For example, an ACS case file might include a single self-reported account of a family’s income to give a caseworker a general sense of that family’s economic stability. Because verification of family income is not necessary for their child welfare work, it is unlikely that the caseworker would have collected the formal documents necessary to verify eligibility for a means-tested benefit. Therefore, while ACS data systems may contain income information that could be used to screen for potential benefit eligibility, the information contained there is not likely to be sufficient to determine eligibility for benefits for which income information is required, nor to enroll a client in an external service. This is just one example; in general, the information collected for one purpose by a specific agency will not include most of the data needed to complete other specific screenings or applications.

It is worth considering the possibility of modifying the way at least some front-line staff interact with clients to collect information that could be valuable for benefits screening. As we heard throughout our interviews, these process changes should be considered carefully. There could be negative consequences that would affect the case worker’s ability to conduct their core work, affecting the trust being built in a relationship or requiring a case worker meeting to extend for an unreasonably long time.

**Data Consistency.** Even when information is collected for the specific purpose of a benefits program application, currently there are no general shared standards on the data required or how that data is defined or formatted. Thus, information collected for one benefits program may not readily meet the information requirements for another program. For example, the City’s SCRIE and DRIE rent freeze programs for senior citizens and people with disabilities do not have any requirement related to an applicant’s citizenship or immigration status. However, SNAP does have such requirements under federal law. It is therefore not possible to accurately or completely assess SNAP eligibility based on a SCRIE/DRIE application, which will not contain important information about citizenship or immigration status.<sup>13</sup> There are many examples of specific data points required for a one application but missing for another. Therefore, the assumption that use of one application will enable agencies to populate and complete applications in other areas is incorrect; at best, an agency can approximate likely eligibility, but it cannot accurately use the other data to confirm eligibility.

**Data Timeliness.** Timeliness is another issue that limits opportunities to repurpose data for benefits applications. For many benefits, agencies must review and respond to client applications within a mandated timeframe. For example, SNAP applications must be reviewed within 30 days, including the phone or in-person interview component.<sup>14</sup> Given this constraint, using data submitted for other services, which may not have the same timeliness rules, would result in large volumes of applications for ineligible applicants, with applications that are missing critical data or are rife with inaccurate data. To process these applications would require a corresponding increase in the agency’s capacity. Without measures to ensure applications are complete and accurate, this process would demand a major investment of City resources for minimal return.

Finally, even verified and accurate data can change quickly. For example, in partnership with the Benefits Data Trust, DSS/HRA is piloting and evaluating a program known as Medicaid-SNAP Connect, which identifies individuals who recently enrolled in Medicaid and are likely eligible for but not currently enrolled in SNAP (see text box on “DSS/HRA’s Partnership with the Benefits Data Trust: Benefits Innovation in NYC”). The Medicaid-SNAP Connect initiative invites these applicants to participate in a streamlined process by using information from their recent Medicaid submission. DSS/HRA and BDT have determined that, even within 90 days, information such as income, household size, and even contact information frequently becomes outdated. Therefore, it would not be advisable to assume that information from an application submitted even in the recent past is still accurate for a client.

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<sup>13</sup> This issue is discussed in depth in Section III below.

<sup>14</sup> 7 CFR 273.2 (g)(1-3). See also <http://otda.ny.gov/programs/snap/qanda.asp>.

**The Role of Third-Party Assistance.** Due to the complexity of the benefits enrollment process, one of the most powerful ways to reduce barriers to enrollment is to provide timely, personalized assistance to applicants who provide consent to receive these services.<sup>15</sup> In New York City, a host of Community-Based Organizations (CBOs) offer benefits navigation services, which provide individuals and families access to trained staff or volunteers to help identify benefits for which they may be eligible, collect any necessary documentation, and accurately complete applications. HRA recently added a Provider Portal to its online ACCESS HRA platform, which allows CBOs to view real-time benefits information for their clients (with client consent), allowing CBOs to better support benefits applications and re-certifications.

DSS's Community Engagement team is another resource designed to support benefits access. The Community Engagement team develops, implements, and operates new service models, partnership pilots, and other strategies that can leverage the ACCESS HRA tool. Community Engagement establishes and maintains cooperative relationships with other City agencies, community-based organizations, local community leaders, and others in order to expand, support, and improve service delivery and outcomes in the community. Drawing on existing relationships and touch points through community partnerships allows Community Engagement to promote ACCESS HRA and recruit CBOs that will use the ACCESS HRA Provider Portal, which amplifies the City's outreach efforts.

Other agencies, such as the Department of Finance, identified third-party application completers as key, but pointed out that there is room to better support these important resources. According to DOF, many applicants for SCRIE and DRIE rely on a third party to help complete their application, whether that is a professional case manager or a family member.

It is important that future interagency collaborations leverage existing technology and self-service tools like ACCESS HRA in order to maximize client enrollment. This approach provides an efficient and effective solution to expanding enrollment without having to increase City staff that would need to be co-located for such collaborations. The DSS/HRA models discussed above are good examples of how front-line workers, whether working for a CBO (and using HRA's Provider Portal) or working for a City agency can be trained to use these tools with their clients.

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<sup>15</sup>Mapping the Applicant Experience of Benefit Enrollment: A user research study for human-centered public services. (2016, October). *United States Data Service*. Retrieved from <https://usds.github.io/benefits-enrollment-prototype/assets/discovery-findings-mapping-enrollment-Nov2016.pdf>



## **DSS/HRA's Partnership with the Benefits Data Trust: Benefits Innovation In NYC**

Through a partnership with the Benefits Data Trust (“BDT”), a nonprofit that works with state and local governments to improve benefits access, DSS/HRA has launched a number of pilots aimed at reaching out to populations that are likely eligible but not yet enrolled in benefits, and at easing the burden of benefits application, enrollment, and renewal. Partnerships between BDT and DSS/HRA include:

1. **Guardrails:** SNAP applicants and recipients often face procedural barriers to enrollment and recertification, including challenges with the interview process and federal documentation requirements. To address these barriers, BDT developed its “Guardrails” strategy which uses an automated technology solution to send text messages and robo-calls to individuals to help them complete the required next steps in the SNAP application and recertification process. The project leverages SNAP agency data to:
  - a. Proactively identify individuals at various stages in the SNAP enrollment process;
  - b. Determine the best type of messaging to complement DSS’ existing notices to enrollees and new applicants; and
  - c. Send timely, automated reminders via text and phone “nudges.”
2. **Senior Multi-Benefit Outreach and Enrollment:** Since September 2014, BDT, DSS/HRA and Robin Hood have collaborated to identify and facilitate enrollment for eligible senior households that are not yet connected to SNAP, Medicaid, Low-Income Subsidy, Medical Subsidy Program, HEAP and SCRIE. Using a targeted, data-driven approach to conduct direct mail and phone-based outreach, BDT and DSS/HRA are able to identify seniors who are already enrolled in DSS/HRA administered benefits and help them to enroll in SNAP and multiple other benefits they may be eligible for. Since 2014 BDT has helped over 23,000 New York City households enroll in benefits through this initiative. BDT is also interested in studying the impact of providing “information only” interventions – i.e., understanding whether certain seniors may choose to apply for SNAP on their own after receiving outreach letters. A recent MIT study on this question found that BDT’s targeted outreach and application assistance triples SNAP enrollment among seniors ages 60 in Pennsylvania and over and that providing information alone increased SNAP participation by 81 percent in Pennsylvania.
3. **Medicaid-SNAP Connect (MSC):** Built on its existing direct mail and contact center model, BDT uses extremely targeted eligibility criteria to identify Medicaid recipients that are very likely to be eligible for SNAP, but not yet enrolled. BDT then takes MSC outreach clients through a short screening to ensure that their Medicaid and SNAP household compositions are

the same, which determines whether they are eligible for a streamlined SNAP application submission process. Specifically, BDT submits the SNAP application while the client is on the phone and immediately connects them to the On-Demand phone interview. MSC clients are much less likely to have additional documents to submit, as documents from their Medicaid file can be used to verify SNAP eligibility. Any client that is not eligible for the MSC process is assisted with submitting a SNAP application online through ACCESS HRA and offered document support with BDT. The MSC program is currently in a pilot and evaluation phase. All BDT outreach messages are sent in the client's preferred language for communicating with DSS/HRA.

### **Accounting for Client Preference**

It is important to note that some individuals who may be entitled to benefits choose not to use them for any number of reasons. Efforts to measure the success of benefits access initiatives must be careful to account for the difference between opting out of benefits, and failure to enroll because the barriers to doing so are too high.

### **The Potential of Pre-Filled Applications**

As part of this study, we explored the possibility of using administrative data to compile pre-filled applications, which could be provided to applicants to complete and return. In the Data Quality section above, we describe how the information provided in one benefits application is rarely, if ever, sufficient to complete a separate application. And furthermore, crucial pieces of information such as mailing address, income, or phone number may change frequently, making it challenging to use previously collected data for a new application. Therefore, pre-filling applications using information from another benefit is not a viable approach in most cases.

It is more feasible to create pre-filled applications for benefits *renewals*. For example, via ACCESS HRA, clients can access recertification forms for Cash Assistance and SNAP with pre-filled information included. As the New York State takeover of the Medicaid program proceeds, clients can also access a pre-filled Medicaid Renewal form, which they must print and submit. Rather than accessing these applications through a link, these applications are accessed on ACCESS HRA through a secure and credentialed account. As additional agencies move applications online and into a secure environment, additional possibilities will be created for pre-filled online renewal applications.

### Section III: The Landscape of Benefits Linkages & Challenges to Automatic Benefits

LL60 requires an assessment of the opportunity to use administrative data “including but not limited to individually identifiable data, that is maintained in databases managed by the City of New York” to simplify the benefits application and enrollment process. The Center on Budget and Policy Priorities has produced an extensive summary of existing benefits linkages. These include “automatic” linkages, i.e., “those linkages that allow participants in one program to be enrolled in another program without a separate application and with little or no involvement by the participant because there is an established data sharing mechanism”<sup>16</sup> and “streamlined” linkages, i.e., “linkages that eliminate one or more steps in the application process by allowing enrollment in one program to satisfy some eligibility requirements for another program; individuals must still take additional steps to enroll in the additional program.”<sup>17</sup> In addition, these linkages may be mandatory, optional for states, or in a pilot/waiver phase.<sup>18</sup>

Crucially, the vast majority of the optional linkages must be adopted at a state level. Examples include linkages related to SNAP, Medicaid, WIC and HEAP. The bulk of linkages that can be adopted at a local level are related to free school meals, which New York City provides to all students.<sup>19</sup>

In this section of the report we discuss several major obstacles to widespread benefits *automation* at a City level. We have conducted a thorough analysis of eligibility criteria, application requirements, governing authorities, administration, and benefits interactions for four major benefits: SNAP, WIC, SCRIE, and DRIE. The complete “Benefits Crosswalk” analysis is attached to this report as Appendix I, and highlights are discussed throughout this section of the report.

Later in this report, we provide several proposals for making meaningful improvements in benefits application and enrollment processes, while accounting for the complexities detailed below, focusing on levers under the City’s control, and avoiding potential negative consequences.

#### A. Varying Eligibility Requirements and Definitions

Because benefits and services have different policy goals, target populations, and administering authorities, their individual eligibility and enrollment requirements are distinct and they may define key concepts in different ways.<sup>20</sup> For example, while in-kind benefits are not reflected as income on a tax form, this support may be considered as part of a family’s income for other benefits. The documents and

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<sup>16</sup> Ambegaokar, S., Neuberger, Z., & Rosenbaum, D. Opportunities to Streamline Enrollment Across Public Benefit Programs. (2017, November 2). *Center on Budget and Policy Priorities*. Retrieved from <https://www.cbpp.org/research/poverty-and-inequality/opportunities-to-streamline-enrollment-across-public-benefit>

<sup>17</sup> Ibid.

<sup>18</sup> Ibid.

<sup>19</sup> Lunch Is Free for All NYC Public School Students. *Office of Food and Nutrition Services*. Retrieved from <http://www.schoolfoodnyc.org/freelunch/freelunch.htm>

<sup>20</sup> In this report, we primarily focus on differences across benefits related to eligibility, application, verification, and renewal. However, it is also important to note that benefits differ in what they require of clients *after* enrollment (e.g., employment levels, child support, and other types of engagement).

information a resident provides to verify income for the EITC, for example, will *not* be sufficient to verify their income for purposes of Cash Assistance. Similarly, the way a household is defined for SNAP is different than the way it is defined for Medicaid.

For this reason, it is rarely possible to directly transfer information from one benefit application to another, without creating significant errors that would affect a client's eligibility, and potentially make them liable for accusations of fraud. A comparison of SNAP and Cash Assistance demonstrate that there are numerous differences between how the benefit amounts of SNAP and Cash Assistance are determined for individuals through the "budgeting" process which is the method of calculating those benefits. For example, Cash Assistance and SNAP have different income disregards and deductions, and SNAP household size is calculated based on who the client shares meals with whereas Cash Assistance is not. Since the programs contain eligibility elements that cannot be reconciled for use with two different applications, the only alternative would be to change eligibility requirements so they are aligned – but requirements for these benefits are set at the state and federal levels. New York City, therefore, is not in a position to modify these requirements to streamline enrollment.

To more explicitly demonstrate the varied eligibility requirements across benefits, we have provided a "Benefits Crosswalk" (Appendix I) comparing requirements for SNAP, WIC, SCRIE, and DRIE. SNAP, WIC, SCRIE, and DRIE vary dramatically in terms of eligibility criteria. Each program has unique definitions for an assistance unit, and they treat the income and resources of the assistance units differently. In broad terms, an assistance unit means:

- SNAP: for the most part, individuals who share meals (although some of those individuals may be excluded from receiving the benefit but still have their income and resources counted);
- WIC: the persons eligible to receive the benefit (e.g., pregnant women, infants) plus those they live with as a combined economic unit (i.e., sharing housing, income, and goods); and,
- SCRIE and DRIE: any person living in the household.

Further, in SNAP, the treatment of income, resources, and expenses is especially complicated for households with ineligible immigrant members (see Appendix I for eligible immigration statuses). This challenge is not present for WIC or SCRIE and DRIE households. In another example, earnings of minors in a SNAP household who are still attending school are excluded, but are counted in WIC, SCRIE, and DRIE calculations, according to available documentation.

The four benefits have different non-financial eligibility criteria, largely because they are designed to serve different populations:

- SNAP comes closest to being a universally available benefit. However, it has significant restrictions on participation by excluding many categories of non-citizens and adding eligibility requirements for students and working-age adults;
- WIC is only available to children under five and pregnant, post-partum, or breastfeeding women; and
- SCRIE and DRIE are only for households headed by seniors and individuals with disabilities, respectively, and residing in designated rent-regulated units.

Income limits and non-financial eligibility criteria vary significantly across benefits. WIC and SNAP use Federal Poverty Guidelines that account for household size to set income limits, and the income limit(s) that applies to SNAP applicants further depend on different factors like age, expenses, and sources of income. SCRIE and DRIE have an income limit set by state law of \$50,000 regardless of the size of the applicants' household.

Income evaluation also varies significantly across benefits. We identified that these four benefits consider a total of 112 specified types of income (e.g., wages, foster care payments, Social Security, etc.), and their treatment varies. For example, only about two-thirds of the income types are definitively treated the same in both SNAP and WIC. It should also be noted that this list is not exhaustive because there are many types of income that have not been anticipated for every program, such as how to count a gift card.

Resources are only counted as an eligibility factor for SNAP, and even then, only in some circumstances. In addition, SNAP is the only program that heavily utilizes deductions such as for shelter, dependent care, medical costs, and self-employment expenses. WIC only allows deductions for self-employment expenses. Annual federal, state, local and Social Security taxes paid are allowable deductions for SCRIE and DRIE and not SNAP.

The significant constraints imposed by current eligibility criteria for the four benefits analyzed here only become more complex when additional benefits are added to the analysis.<sup>21</sup>

Taken together, the analysis described here has two implications for efforts to streamline benefits access. First, it is not feasible to directly use the application for one benefit (e.g., the SNAP application) to apply for another. For example, the SNAP application only includes some of the questions needed to complete a WIC application. So a WIC application completed using a SNAP one would be incomplete. Other questions (e.g., about household composition) are asked in a way such that the information provided does not make them usable for a WIC application. Second, creating a “common application” that asks all the questions for all of the programs in one place would produce a highly complex form.

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<sup>21</sup> This analysis draws heavily from analysis conducted by the Benefits Data Trust, who served as expert consultants in support of this study, as well as benefits access initiatives in partnership with the Department of Social Services and the Department of Finance. “Benefits Crosswalk and Opportunities for Streamlining Benefits Access across SNAP, WIC, SCRIE, and DRIE” (2018). *Benefits Data Trust*.

Such a complicated application could be a deterrent to applicants, who would likely be frustrated by the volume of questions they are required to answer.

### **B. Multi-Step and Varied Application Processes**

The self-reported data provided by an applicant is just the first step in a typical benefits application process. Most data points, such as income, residency, etc. must be verified through documentation submitted by applicants and reviewed by administering agencies. However, the specific documents that individuals are required to submit, and the process for reviewing these documents, varies across benefits. Given this complexity, and the fact that benefits are governed by separate entities at the federal, state, and local level, it is not possible, at the City level, to create a single enrollment process that would apply to all benefits.

The four benefits analyzed in detail in Appendix I (SNAP, WIC, SCRIE, and DRIE) each have significantly different application and interview requirements.

### **C. Verification Processes**

All benefits have requirements to verify what an applicant claims on an application. As the discussion of income types above highlights, there can be many things to verify and many acceptable means of verification. For SNAP especially, there is wide variation in how the verification process works. In some instances, households can self-attest to their circumstances while in others, the City can use reliable information available to it from other benefits and sources. However, households must often provide their own proof of things like identity and earnings, although collateral contacts may be used if a documentary source is unavailable. SNAP and WIC both have exceptions, called categorical and adjunctive eligibility respectively, that allow receipt of certain other benefits to stand in for more detailed documentation requirements. This means, for example, that proving receipt of SNAP satisfies the income eligibility requirement for WIC.

While many of the same kinds of documents can be used to verify eligibility requirements across programs, there are some key differences. For instance, SNAP and WIC must generally verify current income, whereas for SCRIE and DRIE previous year's income is verified, necessitating different documents. Similarly, SCRIE and DRIE must verify housing more specifically than other benefits through the current and previous year leases, whereas address and residency can be verified through different forms of documentation or collateral contact for SNAP.

Overall, administrative policy and practice vary significantly across benefits.<sup>22</sup>

#### **D. Benefits Interactions**

There are numerous and often unanticipated ways that benefits may interact with one another. In the cases of SNAP and WIC, these interactions are explicitly based on federal policy. The dozens of interactions between these benefits and others are certain to be factors.

As mentioned above, adding additional benefits to this analysis would lead to a significant increase in the complexity of these interactions and can have unintended consequences depending on highly individualized client circumstances. The following example highlights these complex relationships as well as choices individuals need to be able to make for themselves on a case-by-case basis: SCRIE/DRIE reduces SNAP shelter deduction (and possibly benefits); receipt of SCRIE/DRIE lowers rent which reduces the value of shelter expenses that can be claimed for SNAP eligibility purposes. This in turn may reduce or eliminate a household's excess shelter expense deduction thereby reducing their SNAP benefit amount and possibly even making them ineligible.

Finally, when considering the possibility of pre-emptively identifying benefits interactions, it is important to return to the fact that household composition is defined differently for varied benefits. Because the household might be counted differently for SNAP and WIC, for example, accurately evaluating the interaction between these two benefits based on an application for one benefit or other administrative data would likely require additional screening to accurately account for the income/expenses of additional individuals.

#### **E. Public Charge, Benefits Cliff, and Other Risks**

Automatically enrolling individuals or households in benefits without providing them a chance to consider their interest and consent in doing so could put vulnerable New Yorkers at risk, for reasons outlined below.

**Public Charge.** Federal immigration law allows authorities to deny visas or requests for adjustment of status to legal permanent resident for any individual that they determine is “likely at any time to become a public charge.”<sup>23</sup> In the fall of 2018, the US Department of Homeland Security published a proposed rule change that would, if finalized, greatly expand the applicability of “public charge” inadmissibility.

Historically, public charge determinations examined applicants' use of only a small subset of

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<sup>22</sup> Ibid. Operations is producing a report in response to LL75 of 2018, focused on the interoperability of client information management systems in New York City.

<sup>23</sup> 8 U.S.C. 1182(a)(4).

government services: cash assistance programs for income maintenance and government-funded institutionalization for long-term care. The proposed rule change would expand the list of specified programs -- adding Medicaid, SNAP, Section 8, public housing, and the Medicare Part D Low-Income Subsidy -- and increase scrutiny of applicants' use of public benefits for which they are eligible.<sup>24</sup>

A research brief<sup>25</sup> released in December 2018 by the NYC Mayor's Office for Immigrant Affairs (MOIA), NYC Opportunity and DSS examined the impact of the proposed rule change in New York City and concluded that the proposed rule change, if implemented, could impact hundreds of thousands of New Yorkers' willingness to access to public benefits and eligibility for visas and permanent residency.<sup>26</sup> This in turn, they estimate, would increase poverty for affected families, and have a significant economic impact on the city.

**Benefits Cliff.** The term "benefits cliff" refers to the risk of the sudden loss of benefits due to an increase in earned income that makes an individual or household lose eligibility for a benefit, ultimately resulting in a decrease in net income. Automatically enrolling a household in an additional benefit could have adverse impact on their eligibility for other benefits on which they may already depend. The interactions among specific benefits, as described above, are quite nuanced, and determining these interactions for an individual household requires careful analysis of an individual case. And, if a household is automatically enrolled in a new benefit without careful consideration for its long-term income prospects, automatic enrollment could be setting that household up for future reduction in net income.

### **ACCESS NYC/PEU Partnership**

NYC Opportunity has partnered with the Mayor's Public Engagement Unit (PEU) to help outreach workers incorporate benefits screening into their work. PEU proactively engages New Yorkers to connect them with key City services, such as tenant support and healthcare. Their Outreach Specialists connect with New Yorkers through data-driven door knocking and through neighborhood events with community partners. Beginning with a phased rollout in April 2018, PEU Outreach Specialists that currently focus on tenant support issues can now additionally facilitate comprehensive benefits screening by utilizing the ACCESS NYC digital eligibility tool to help New Yorkers apply to

<sup>24</sup>Expanding Public Charge Inadmissibility: The Impact on Immigrants, Household, and the City of New York. (2018, December). *New York City Mayor's Office of Immigrant Affairs, Mayor's Office for Economic Opportunity, Department of Social Services*. Retrieved from [https://www1.nyc.gov/assets/immigrants/downloads/pdf/research\\_brief\\_2018\\_12\\_01.pdf](https://www1.nyc.gov/assets/immigrants/downloads/pdf/research_brief_2018_12_01.pdf)

<sup>25</sup>Ibid.

<sup>26</sup>Ibid.



critical poverty-alleviating programs. PEU Outreach Specialists, who are trained in community engagement tactics, are equipped with tablets that allow them to efficiently integrate the ACCESS NYC screening into their interactions with New Yorkers, for clients who consent to further engagement.

The optimized screener used by outreach workers includes enhancements the team has made since the relaunch of ACCESS NYC in March of 2017, such as the capacity for New Yorkers to receive their eligibility results through a text message or email. Enhancements also took into account the fast-paced nature of in-person outreach and evolved to facilitate quick intake for PEU Outreach Specialists and their clients. This includes interactions happening outside of the computer screen. The partnership has produced templates for paper referral cards that can be provided for New Yorkers without phones or computers, and the framework for PEU to be able to assist with a wide array of additional benefit programs.

PEU Outreach Specialists case manage New Yorkers through the enrollment process for dozens of City programs, maximizing the number of people who can benefit from important public services. At later phases, additional PEU teams will integrate the expanded benefits screening into their outreach. With PEU acting as a personal entry point, and ACCESS NYC acting as a digital entry point, more New Yorkers will receive assistance with applying for an array of additional benefits programs and support. NYC Opportunity will continue to work with PEU on training, operationalization, and refinement of this new product and service, to better support clients seeking services.<sup>27</sup>

#### **IV. The Benefits Enrollment Experience**

Meaningful efforts to improve benefits access must be based on the specific behaviors and interests of potential enrollees. A 2016 study by the United States Data Service (USDS)<sup>28</sup> provides a helpful framework for considering the client experience in benefits application, enrollment, and renewal, which helped guide this study. Understanding the client experience and challenges encountered is critical to building promising strategies for providing assistance to individuals in completing public assistance applications.

USDS identified four primary phases<sup>29</sup> in the benefits enrollment process, and significant pain points clients experience within each. As part of our study, we reviewed New York City's efforts across

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<sup>27</sup>NYC Opportunity and the Public Engagement Unit Partner for Facilitated Benefits Screening and Enrollment: Going Beyond for the Screen for Integrated Benefits Outreach. (2018, April 10). *New York City for Economic Opportunity*. Retrieved from <https://medium.com/nyc-opportunity/nyc-opportunity-and-the-public-engagement-unit-partner-for-facilitated-benefits-screening-and-e889407ccf4c>

<sup>28</sup>Mapping the Applicant Experience of Benefit Enrollment, (2016), *United States Data Service*. Retrieved from <https://usds.github.io/benefits-enrollment-prototype/assets/discovery-findings-mapping-enrollment-Nov2016.pdf>

<sup>29</sup>Ibid

these phases (see Appendix II). This review identified areas of opportunity, which helped to guide our recommendations.

Phase	Components	Major Pain Points
Find Support and Programs	<ul style="list-style-type: none"> <li>● Seek support</li> <li>● Determine eligibility</li> <li>● Select programs to apply for</li> </ul>	<ul style="list-style-type: none"> <li>● Figuring out where to start and getting connected to support</li> </ul>
Prepare and Apply	<ul style="list-style-type: none"> <li>● Prepare application</li> <li>● Submit application</li> </ul>	<ul style="list-style-type: none"> <li>● Finding &amp; keeping track of documents needed to prove eligibility</li> <li>● Completing complex applications</li> </ul>
Provide more Information and Await Decision	<ul style="list-style-type: none"> <li>● Receive notice of application submission and any next steps</li> <li>● Submit additional information, if required</li> <li>● Complete an interview, if required</li> </ul>	<ul style="list-style-type: none"> <li>● Missing notifications</li> <li>● Unclear notifications</li> <li>● Missing pre-scheduled interviews</li> </ul>
Benefits Begin	<ul style="list-style-type: none"> <li>● Receive approval / denial notice</li> <li>● Use benefits (if approved)</li> </ul>	<ul style="list-style-type: none"> <li>● Waiting for response</li> </ul>
Renew Benefits	<ul style="list-style-type: none"> <li>● Receive a notice for renewal</li> <li>● Complete renewal application</li> </ul>	<ul style="list-style-type: none"> <li>● Missing notice to recertify</li> <li>● Finding / providing additional documents</li> <li>● Getting cut off</li> </ul>

## Section V: Recommendations

In the previous sections, we outlined core considerations that influence benefits access and detail some of the challenges of using an administrative data set to complete or pre-fill applications for a benefit or service on behalf of a client, or to determine eligibility and enroll clients automatically based on information collected for another purpose. In this section, we make recommendations for practicable, meaningful ways to streamline benefits application and enrollment for New York City residents.

Broadly, there are two starting places for our recommendations. First is the applicant experience. In Section IV and in Appendix II we map the generic journey of a New Yorker applying for a single benefit, which we used to consider how the City might make it easier and more seamless for a resident to apply for additional resources, taking into account regulatory and operational constraints. Our second starting place is the administrative data that is already possessed by the City. We suggest possibilities for how the City might draw on existing relationships with residents to provide information about additional benefits that might be available to them. Collectively, these potential strategies comprise ways to screen

individuals for potential eligibility, notify those individuals, and support them through the application and enrollment processes.

In brief, our recommendations include the following:

1. Explore the feasibility and value of targeted outreach to residents likely eligible for specific benefits utilizing ACCESS NYC's eligibility rules engine by using existing data-sharing agreements, and expand data-sharing to additional agencies to facilitate new outreach and enrollment efforts.
2. Identify opportunities through existing outreach and interactions with residents to share information about benefits more comprehensively.
3. Assess the value of creating a Digital Application Service to accelerate additional online applications by offering support and design tools to agencies that are examining the feasibility of online applications.
4. Where within City jurisdiction, agencies should explore feasibility and value of simplifying renewal and determination processes by taking advantage of existing benefits linkages and exploring new collaborations.
5. Pursue legislative advocacy to enable additional local strategies.

Each of these recommendations is described in detail below.

**Recommendation 1: Explore the feasibility and value of targeted outreach to residents likely eligible for specific benefits utilizing ACCESS NYC's eligibility rules engine by using existing data-sharing agreements, and expand data-sharing to additional agencies to facilitate new outreach and enrollment efforts.**

The City currently makes substantial efforts, as this report describes, to publicize the availability of programs and benefits meant to help New Yorkers meet their critical needs.

There are still, of course, New Yorkers who would be eligible to receive federal, state and local benefit programs if they applied for them. The City continues to look for opportunities to reach these New Yorkers. Any effort to increase enrollment requires a number of interrelated efforts, including increased data-sharing among governmental agencies, collaborations with CBOs, and tools that can be used to help screen for benefits.

One potential new tool builds off of ACCESS NYC, the City's online screening and information tool. In 2016, the ACCESS NYC product underwent a substantial redesign.<sup>30</sup> As part of this upgrade, NYC Opportunity developed an eligibility rules engine on the open-source Drools platform. The policy

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<sup>30</sup> <https://civicservicedesign.com/case-study-access-nyc-part-1-5ccdf1c4a520>

rules engine uses core individual and household details such as income, expenses, employment status and basic demographic characteristics to identify potential eligibility for any one of 31 benefits programs. The eligibility criteria are maintained and updated by NYC Opportunity in conjunction with the administering City agencies. (As discussed above, the screener does not contain the level of granularity or verified data to actually conduct enrollments or make definitive and final eligibility determinations.)

NYC Opportunity is now extending this eligibility screening capability by creating the NYC Benefits Eligibility API (“Eligibility API”) allowing access to the benefits policy rules engine. This new capability is achieved through an application programming interface (API). The Eligibility API will be a data service that allows organizations, whether they be government or benefits navigators, to transmit household details (without PII) directly against ACCESS NYC’s rules engine in a data or .csv file format and receive a response or .csv output file containing the benefit programs for the household may be eligible. This will extend the capacities of comprehensive benefits screening to city agencies, partners, and the general public to utilize for their own existing or new digital products, tools, and services and can inform targeted benefits outreach efforts. The API is scheduled to be completed and released publicly in 2019.

While the API would present the City and its partners with a new service to leverage as part of benefits screening, agencies are currently limited in their ability to take advantage of this resource in large part because not all agencies currently participate in a common data-sharing framework. With more comprehensive participation in data-sharing efforts among City agencies, agencies using the API to screen their clients for potential additional benefits would be able to conduct a match with other agencies to see if clients are already enrolled, thus increasing the likelihood that any outreach is targeted and not too overbroad.

Relatedly, some agencies, like DSS, have reached the limit in the fruitful targeted outreach that they can do because they have already exhausted matches among the agencies participating in data-sharing agreements. Any further matches within this current universe of data-sharing would not yield additional likely eligible populations to conduct successful outreach. For the API to have meaningful utility, more agencies will have to determine that they are legally permitted to screen their existing clients and match them against the enrollment lists held by other agencies.

It is important to note that using the API also entails costs for agencies. First, agencies must expend resources to conduct “data transformation”—the work that is needed to adapt administrative data into a digestible form that is compatible with the API. Second, outreach and enrollment efforts can be costly, and are only as good as the data on which they are based. The resulting data from a given API match may turn out to be a weak indicator of eligibility; the API contains some inherent limitations in that the client characteristics that it relies on to check for potential eligibility are not comprehensive, thus

preventing agencies from having a high degree of certainty that a match in the API will actually be eligible. Therefore, a low rate of match may lead to weakly targeted enrollment efforts and, in turn, applications that have little likelihood of yielding enrollments. More examination of the technology and its potential uses is needed. However, given the current limits, expanding data sharing with other agencies, including DOF, DOHMH, and CUNY, present exciting opportunities to engage new client populations to identify areas to expand benefits enrollment, including, potentially through the use of an API engine.

Leveraging CBO partnerships is critical to addressing benefits under-enrollment. The API presents additional opportunities for partners outside of government. A key strategy in addressing under-enrollment of benefits is to expand and deepen CBO involvement. CBOs, for example, could use the Screening API to run eligibility checks for their clients and conduct more targeted outreach, particularly in underserved communities. Self-service tools like ACCESS HRA help CBOs (as well as partner agencies) move their clients from screening to actual application. This approach leverages the teams of people who are embedded in communities with the tools to expand enrollment. DSS's Community Engagement team is an example of how cooperative relationships with other City agencies and CBOs can improve service delivery and outcomes in the community.

Another potential benefit of using the API would be to leverage the tool for case management by both non-profit providers and government agencies. Case workers could assess their client lists using the API to see which clients might be likely eligible for given benefits. Case workers could then in turn use that information to ask additional clarifying information of clients regarding their eligibility which could be used to guide clients to benefits and applications. While case workers can currently use ACCESS NYC to conduct individualized queries to gauge their clients' eligibility, using the Screening API for case management would be an innovative approach that enables entities to more efficiently target questions through case management, enriching services.

### Recommended Next Steps

- Complete development and release of the API.
- Market the pilot with CBOs and government agencies to encourage initiatives around data matching.
- Conduct a pilot to test the feasibility of the approach described above. Partner with a City agency or agencies that currently do not participate in broad data-sharing agreements. This agency could screen multiple client cases, and use the output generated to determine the feasibility of notifying households that they may be eligible for additional program and services.

**Recommendation 2: Identify opportunities through existing outreach and interactions with residents to share information about benefits more comprehensively.**

New York City’s commitment to helping residents access resources is reflected in the variety of outreach efforts conducted by its agencies. Throughout the year, agencies independently manage numerous marketing campaigns that raise public awareness about the benefits programs and services they offer and seek to increase the number of residents who actively enroll. In some cases, the marketing is general and in others agencies target specific, qualifying New Yorkers. For example, since the launch of Pre-K for All, there have been extensive efforts to ensure that families with four-year olds receive information about the program.<sup>31</sup>

In addition to general marketing and targeted, list-based outreach efforts, there are also dedicated outreach teams housed within agencies tasked with promoting specific programs. These teams engage with community-based partners, elected officials, and others, hold resource fairs, and participate in “days of action” and other on-the-ground outreach efforts. Some, like HRA’s SNAP outreach team, are required per their funding source to limit their focus to a specific benefit. In other cases union restrictions may apply. But other groups, while established for a specific purpose, have no formal restriction on what benefits and services they can promote.

There is an opportunity to better utilize these disparate outreach teams and efforts. Conceptually, each touch point with a resident offers the chance to provide information not just about a single benefit or service, but about the broad array of supports that may be relevant. To move closer to this vision, we recommend taking a full inventory of existing outreach teams across agencies to identify how they might share information more comprehensively. It may be possible for specialists in one service to become generalists who are capable of connecting New Yorkers to multiple benefits. The availability of digital information, such as the 30+ benefits described on ACCESS NYC, puts expertise into the hands any outreach worker.

**Recommended Next Steps**

- Develop a comprehensive inventory of outreach teams across the City, including their current size and responsibilities.
- Establish a Coordinated Outreach Working Group and develop recommendations for community engagement collaborations across programs, services, and agencies, within the constraints described above.

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<sup>31</sup> Crawford, Susan P., Mary-Catherine Lader, and Maria Smith. 2015. "On the Road to 'Pre-K for All': The Launch of UPK in New York City." Berkman Klein Center for Internet and Society Research Publication 2015-9. Retrieved from <https://dash.harvard.edu/bitstream/handle/1/28552585/SSRN-id2610694.pdf?sequence=1>.

**Recommendation 3:** Assess the value of creating a Digital Application Service to accelerate additional online applications by offering support and design tools to agencies that are examining the feasibility of online applications.

It is becoming increasingly expected in most service realms that forms and application processes will have an online option. Within City government, agencies have independently worked to move applications and forms online. It is now possible to apply online for NYCHA housing, SNAP, free Pre-K, and many more services.

Still, some applications remain available by paper only, requiring New Yorkers to pick up a physical copy or print a PDF, complete it by hand, and return it to an office by mail or in person. Handwritten applications require staff to key in information from the printed forms; this creates increased processing time, including while an application is in the mail. Some benefits such as SCRIE and DRIE draw extensively on benefits navigators and enrollment assistance providers to help individuals complete the full application process. For these navigators, who are supporting multiple clients, tracking a variety of paper applications and their required supporting documents at various stages of completion can be unwieldy. Without online tools, an agency also has no mechanism to accommodate data pushed from other sources. As the City evolves its ability to move data more seamlessly, newly built online applications should be able to accept data previously entered for matching fields in other applications, reducing redundant entry by applicants applying to multiple benefits.

To help ensure that City agencies have online options for each of their benefit applications, and that new online options can accommodate data transfers, we propose assessing whether a “Digital Application Service” could help accelerate the transition of paper-based forms and workflows to online applications. The service would include: hands-on assistance in designing forms; help in sourcing tools that can integrate with an agency’s existing systems and workflow, where possible; and guidance on standards to support interoperability with applications managed by other agencies. The team that provides the Digital Application Service would serve as a central resource while allowing individual agencies to continue to make independent decisions that work best for the management of their respective work.

An important note: creating an online application process involves significantly more than creating a web-based form. The front-end design of a form is important, but only one step toward a true online option. Agencies maintain existing technology systems, databases, and workflows to manage mission-critical client data, applications, and supporting documentation. A fully functional online application will need to integrate on the back end with an agency’s technical and operational infrastructure. In some cases, this integration with existing systems may require significant investment in technology and in organizational and business process change in order to adapt to putting application



online. These processes can be costly and lengthy. In all cases, each implementation will require an embedded process for legal review and approval when personally identifying information travels between agencies and programs to ensure required legal privacy and data security protections are in place.

A Digital Application Service should help agencies address both front-end and back-end challenges. On the front-end, the service can draw on successful design patterns and user experience research to provide a customizable template, cutting down the time it takes to translate printed forms to successful web interfaces. The back-end work necessarily must be tailored to an agency's specific demands and circumstances, including the rules and software that may be mandated at the state and federal level. Elements of the process are repeatable, however. For example, while the offline and online procedures and staff responsibilities will be unique to each agency (or department within an agency), the steps to map these workflows, and to translate them to digital tools and practices, is a specialization that the service can build. And importantly, a team available to work across agencies would help ensure that each new application adheres to common standards for facilitating data exchange with other forms.

The Digital Application Service should prioritize work with agencies that have not yet moved applications online. Similarly, the service can support agencies that are seeking to develop digital tools for benefits navigators. The service would not be appropriate for those agencies that have already made significant investments in technical and operational changes to integrate new online applications with management and operational systems. For example, HRA has already launched an online SNAP application through its ACCESS HRA platform and benefits re-engineering effort. A Digital Application Service would be completely independent of systems like ACCESS HRA and would instead focus on those forms that still have no online option.

### Recommended Next Steps

- Assess the value of a Digital Application Service by piloting the digitization of at least one print-based application process. (See text box below for a description of a useful test case—a new project among the Mayor's Office for Economic Opportunity, Department of Finance, and Public Engagement Unit.) Document the process and elements that are repeatable, and the costs and level of effort required for both front-end design and back-end integration, and strategy for embedding requisite legal approvals and data security protections.

### **Test Case for a Digital Application Service**

The Mayor’s Office for Economic Opportunity has begun work with the Department of Finance (DOF) and the Public Engagement Unit (PEU) to help outreach workers more efficiently support the client application and submission process for the SCRIE/DRIE Rent Freeze program.<sup>32</sup> The first phase of the pilot will develop and test a tool that allows PEU rent freeze specialists and DOF outreach workers to complete and electronically submit completed initial and renewal SCRIE/DRIE applications packages to DOF for processing on behalf of clients. The tool will be designed to allow outreach workers to update in-progress applications (i.e., enter additional client data or upload additional document) before submitting to DOF, allowing for more complete applications. It will also allow PEU rent freeze specialists and DOF outreach workers to start applications “offline” and have data submitted once a mobile device is connected to the internet. Importantly, the current pilot does not begin to tackle the important question of application *processing*. Once an online application is submitted to DOF, they will process the application through the same methods as a paper application. If the current pilot is successful, a subsequent phase two pilot will integrate application data into PEU’s client database and expand usage to support DOF’s network of 140 community-based organizations which provide enrollment support to residents.

### **Opting Out of Paper Forms**

Some New Yorkers may prefer to manage their benefits online and “opt out” of paper applications and notifications entirely. As more benefits applications, renewals, and other services move online, this may become a more viable strategy. Indeed, ACCESS HRA does allow clients the option to receive all HRA-administered notices as e-notices. We do not, however, recommend eliminating paper applications for any benefit, as some of the most vulnerable New Yorkers do not have regular or reliable internet access.

It is important to note that state or federal jurisdictions may send their own notices to New York City residents. For this reason, NYC agencies often do not have the ability to guarantee a “paper free” benefits experience. For example, New York State sends “Client Noticing System” notices to recipients of HRA-administered benefits managed through WMS. So an HRA client who elects to

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<sup>32</sup> “In 1970, the City of New York began the Senior Citizen Rent Increase Exemption (SCRIE) program, offering qualifying senior citizens an exemption from future rent increases. In 2005, it was expanded to include qualifying tenants with disabilities under the Disability Rent Increase Exemption (DRIE) program. Together, SCRIE and DRIE are known as the NYC Rent Freeze Program. This program helps eligible senior citizens (aged 62 and over) and tenants with qualifying disabilities (aged 18 and over) stay in affordable housing by freezing their rent. Under this program, a property tax credit covers the difference between the actual rent amount and what you (the tenant) are responsible for paying at the frozen rate.” Source: <https://www1.nyc.gov/assets/finance/downloads/pdf/brochures/scriedriebrochure.pdf>

receive only e-notices would still receive some paper notices from New York State.

Furthermore, there are risks to moving all notifications online. When Access HRA moved to develop the “e-notice” option, many community-based organizations expressed concern that “going paperless” could result in individuals failing to receive important information about their benefits. For this reason, it is important that agencies considering online-only notifications ensure there is a multi-step “opt in” process so clients are aware of the changes coming to their notifications and that online notifications are delivered reliably and securely, ideally directly to an individual’s email or phone (as opposed to a message portal that requires a separate log-in).

**Recommendation 4:** Where within City jurisdiction, agencies should explore the feasibility and value of simplifying renewal and determination processes by taking advantage of existing benefits linkages and exploring new collaborations.

As described above, the Center for Budget and Policy Priorities has conducted a thorough analysis of “benefits linkages,” including “automatic” linkages (i.e., “those linkages that allow participants in one program to be enrolled in another program without a separate application and with little or no involvement by the participant because there is an established data sharing mechanism”) or “streamlined” linkages (i.e., linkages that eliminate one or more steps in the application process by allowing enrollment in one program to satisfy some eligibility requirements for another program; individuals must still take additional steps to enroll in the additional program”).

There are, however, limits with this approach that would require larger changes at the state and federal levels. For example, as noted above, since some programs contain eligibility elements that cannot be reconciled in a way to use for two different applications, the only apparent alternative would be to change eligibility requirements so they are aligned, but for some benefits, like SNAP or Cash Assistance, the application requirements are set at the state and federal levels, and therefore, New York City is not in a position to modify these requirements to streamline enrollment. Additionally, linked enrollment requires a level of information sharing between agencies that may not be permissible under current federal and state restrictions imposed by law, so while one agency may have information relating to eligibility for a program that could be used to facilitate enrollment in another program (by the same agency or a different one), privacy restrictions could impede sharing it. Therefore, the City is limited in how much it can create linkages in application and renewal processes absent legal authority.

While New York City already takes advantage of many of the opportunities available, we recommend that each agency ensure they are maximizing linkages of this type, unless in conflict with other agency policy or regulatory authority.

There are limited cases where the City is in a position to define eligibility rules, providing the opportunity for aligning renewal timelines and easing the administrative burden on New Yorkers. Agencies should continue to explore opportunities to create linkages where it is feasible, practical and valuable from an operational perspective.

In addition to these widely available linkages, there are likely additional opportunities for New York City to let receipt of information collected during the application/renewal process for one benefit satisfy all or part of the renewal process for another benefit; this is no small task, and frequently requires coordination with the state or federal government. In addition, bringing alignment of this sort of scale without creating a significant burden on agency workforces may require building connections between agency data systems that allow one agency to access the appropriate information in another system.

One simple but important strategy that would help agencies and offices in efforts to streamline eligibility determination and renewal processes would be to increase access to policy and process documents governing different benefits. If administering agencies made the documents outlining policy and operating procedures more readily available, where appropriate and permissible, community partners and other City agencies could better assist in identifying additional opportunities to improve and streamline access to benefits in New York City.

**Recommendation 5: Pursue legislative advocacy to enable additional local strategies.**

The mosaic of disparate federal, state, and local privacy laws continues to pose barriers to the inter-agency sharing of personally identifying information and systems interoperability involving exchange of such information. Under this patchwork legal framework, access to agency clients' identifying information is generally restricted to specific users performing specific job functions within a single agency and, at times, even within a specific program, making coordinated service delivery and case management involving the same individual or family very difficult. Moreover, requisite language and other requirements for individual data-sharing consent forms vary widely across laws and oversight agencies. Amplifying these challenges is the fact that many privacy laws, such as the federal Privacy Act of 1974, were enacted decades ago and do not address technological advancements that could be leveraged to improve interagency data-sharing, coordination, and systems interoperability. Advocating for legislative reform at the federal and state level has the potential to enable the City to act more like a single organizational unit, rather than a siloed collection of agencies when it comes to delivering benefits, services, and care to individuals and households, particularly the same individuals and households across agencies, while still preserving important privacy and data security protections of individuals' personal information.

## **Section VI: Conclusion**

New York has become a national leader in benefits access and enrollment. For example, efforts by HRA to overhaul administration of Cash Assistance and SNAP have fundamentally transformed the way New Yorkers access key benefits. As of the end of 2018, the percent of SNAP applications submitted online increased to 86%, and the percent of SNAP application interviews now conducted by phone was up to 95%. Efforts like these allow New Yorkers to access benefits in a time and place that works for them.

We recognize that there is always more to do to ensure all residents know about and are able to receive the benefits to which they are entitled. This report highlighted progress to date, as well as the complex legal, technical and programmatic landscape that must be navigated to advance benefits access initiatives. The report also highlights areas that need exploration to determine if pursuing an initiative is worthwhile, feasible or practicable. It also made recommendations that, if enacted, could further demonstrate New York City's leadership in supporting its most vulnerable residents.

## **Acknowledgments**

We would like to thank the Benefits Data Trust (“BDT”) for their ongoing partnership with New York City on efforts to expand benefits access for New Yorkers. BDT's analysis and thoughtful insight were integral to the development of this report and the recommendations described above.

## **Appendices**

- I. NYC Benefits Crosswalk: Comparison of SNAP, WIC, SCRIE, and DRIE
- II. Benefits Access Landscape Map