

Eligibility rules service project

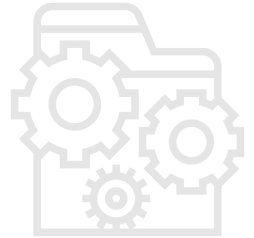
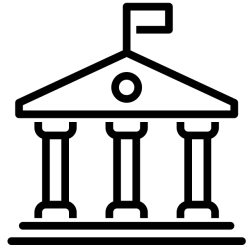
Project was funded through TTS 10x Fund

Our experience

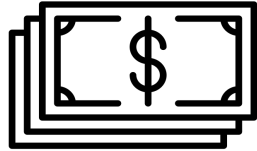
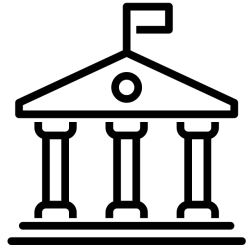
- CA: Child Welfare modular procurement
- CA: MEDS - Medicaid Eligibility modernization
- AK: E&E modernization
- VT: E&E modernization
- AK: Child Welfare modernization
- HHS/CMS: Advance Planning Document(APD) modernization
- 10x: Eligibility rules service
- USDA/SNAP: State waiver path analysis
- HHS/CMS: Multi-program enrollment prototype
- MO: MMIS modernization
- USDA/FNS/Child Nutrition: School Lunch app prototype
- USDA/FNS/Child Nutrition: 10X Data Federation prototype
- DOL/Women's Bureau: Paid Family Leave system prototype
- SSA: Disability case processing system technical assessment
- HHS/CMS w MO, MN, & WY: Medicaid Mgmt Info System (MMIS) path analysis
- HHS/ACYF w MS, CT, MD: Child Welfare path analysis

The problem

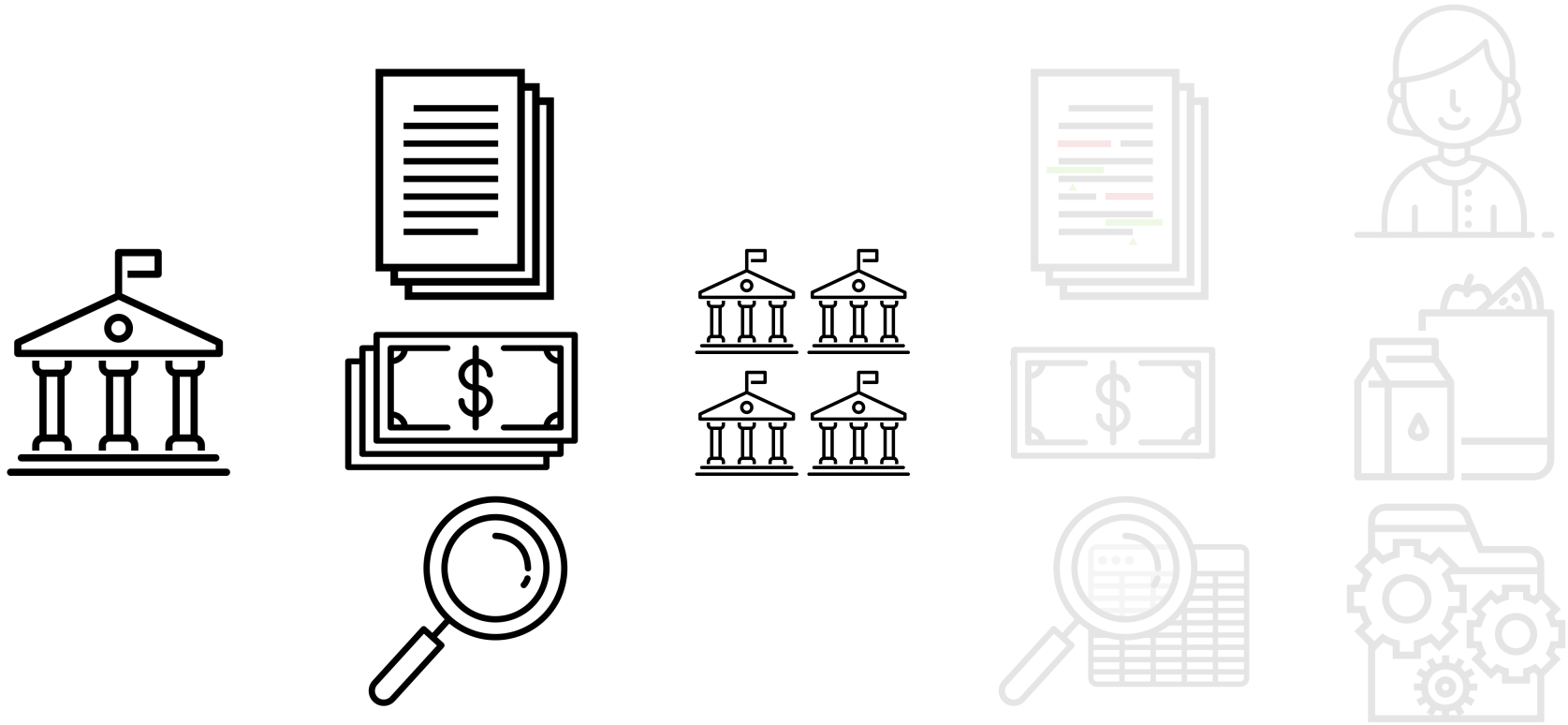
(very much simplified)



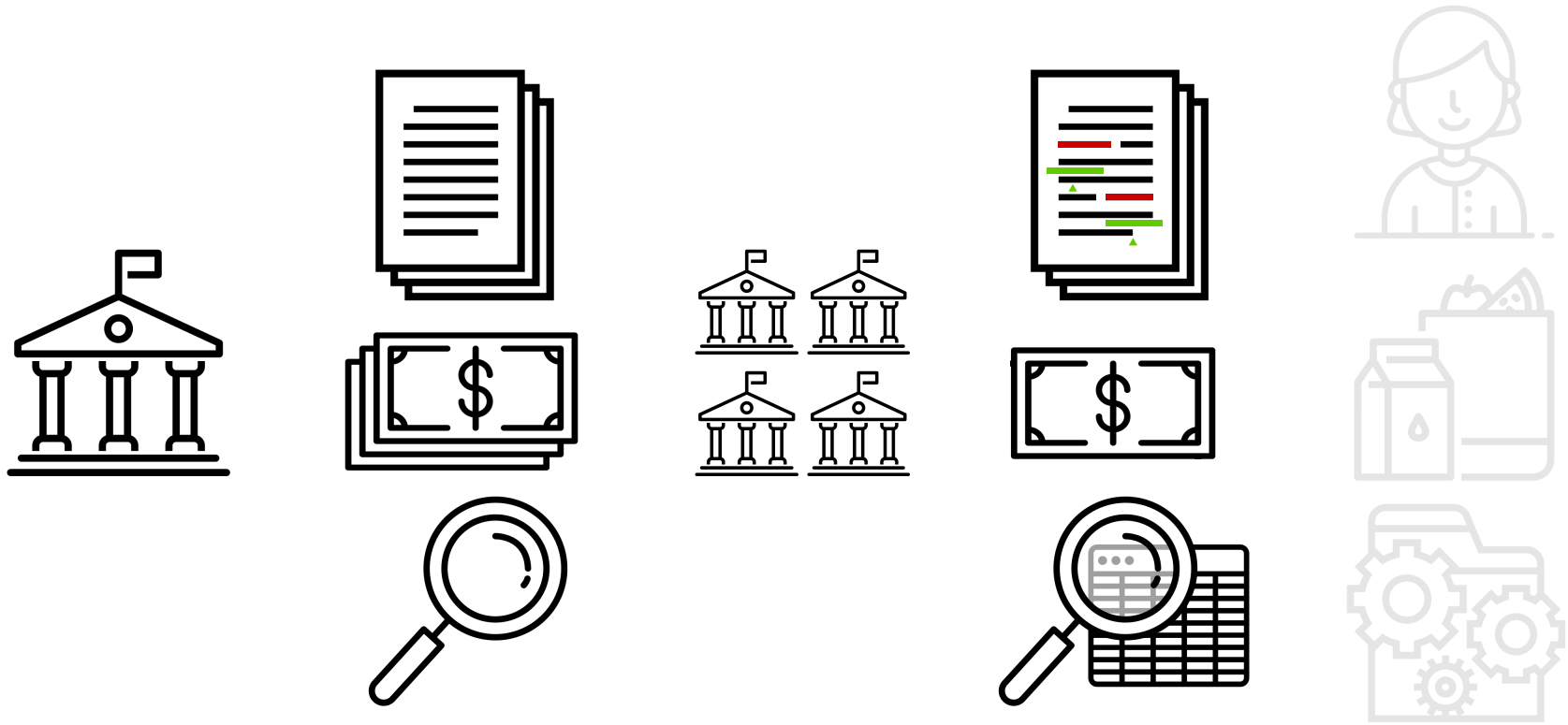
Health and human services programs are managed by *federal* agencies...



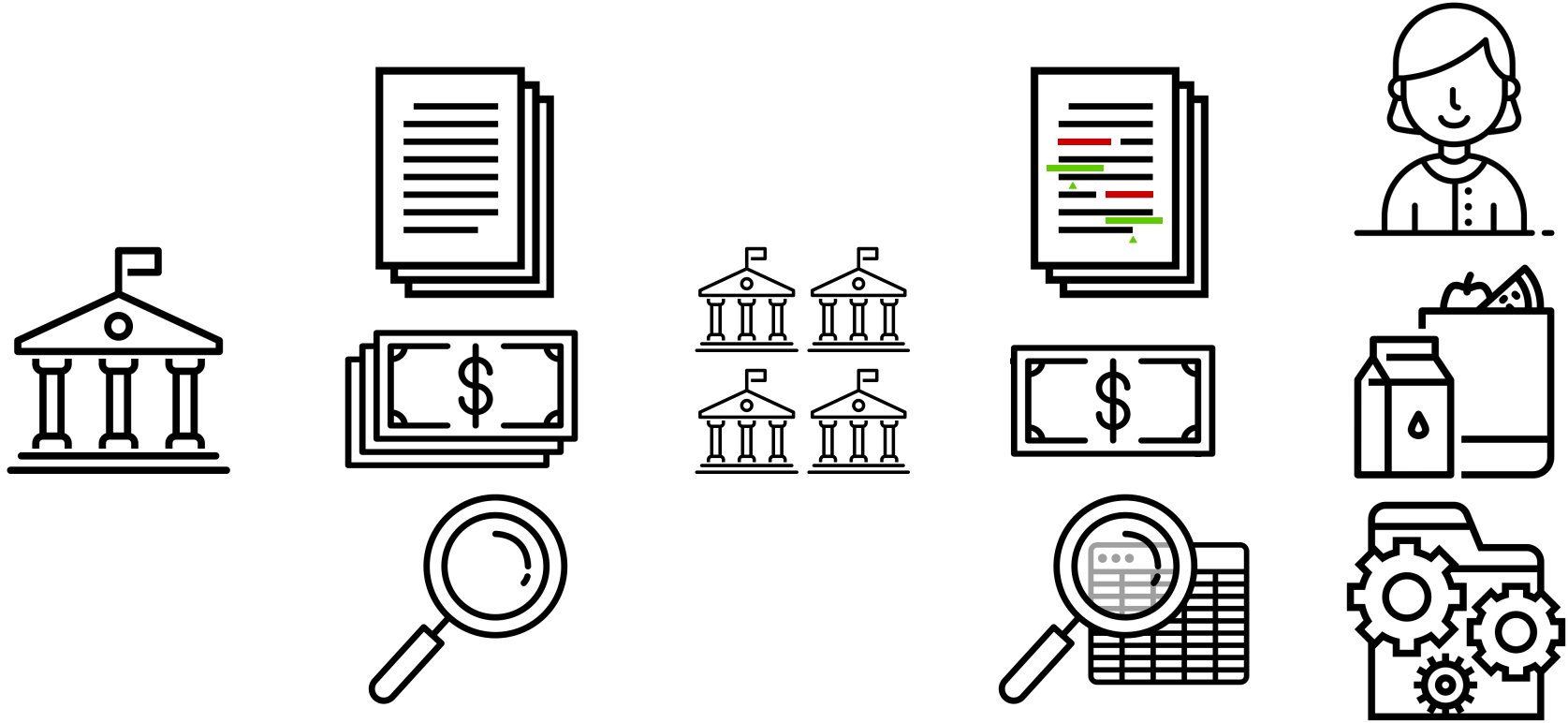
...who define policy, provide funding, and oversee...



...the administration of these programs at the *state* level.



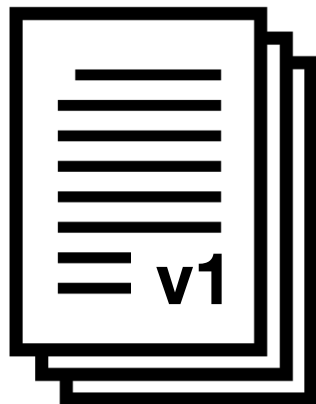
States adjust & implement policy, spend funds, and comply with oversight...



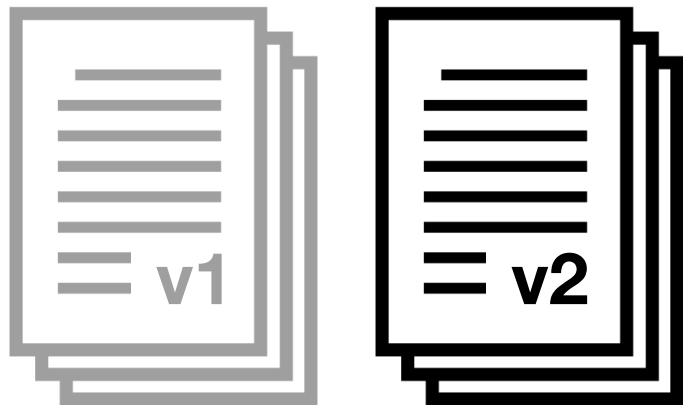
...to operate the program (and the tech it runs on) and deliver services to beneficiaries.



We're going to focus on the technology part, particularly eligibility systems.



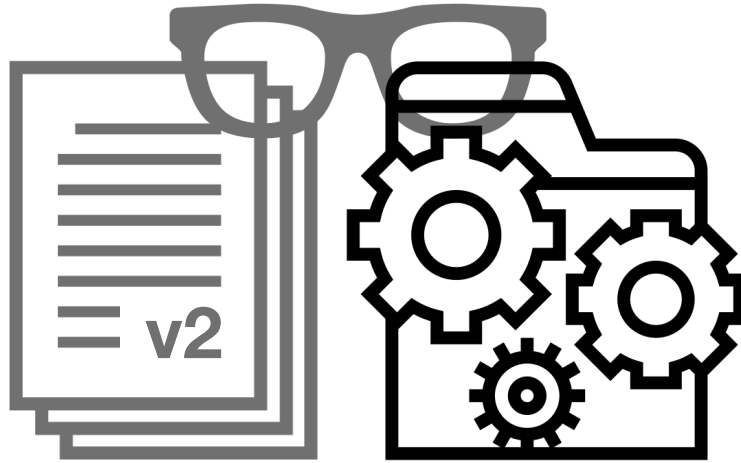
Sometimes the federal policies change.



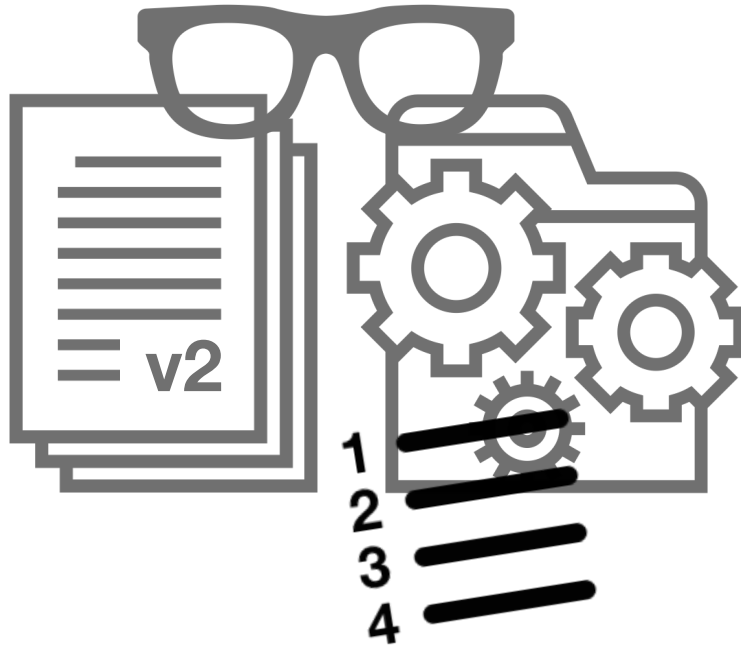
When this happens...



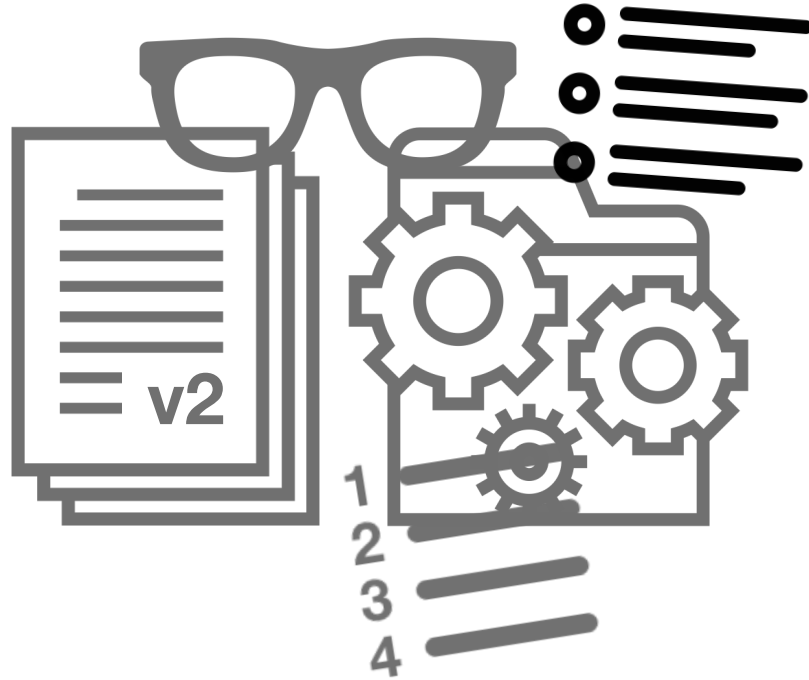
States review the changes...



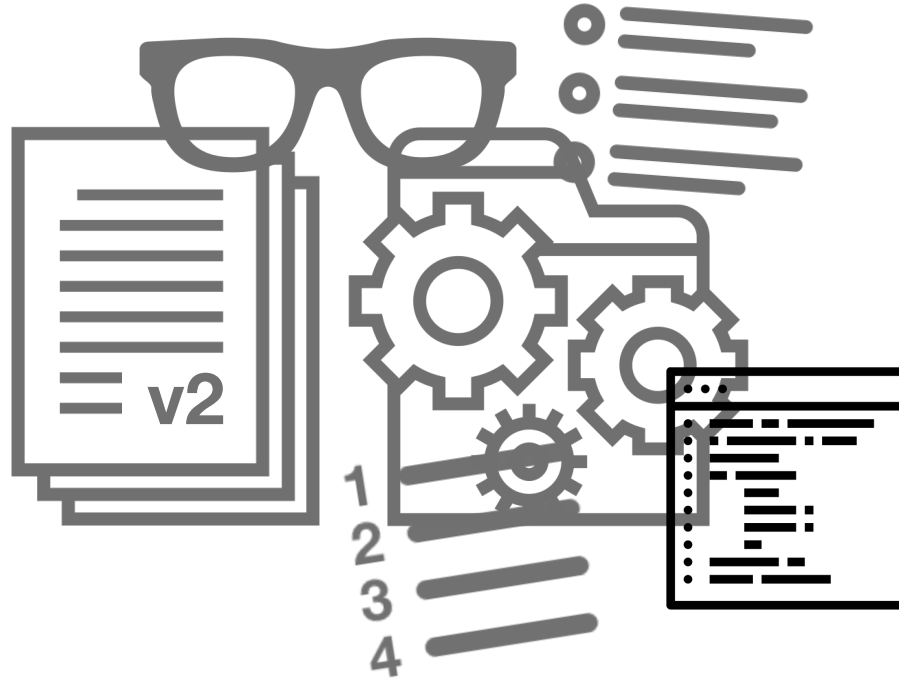
...identify needed system changes to implement the policy...



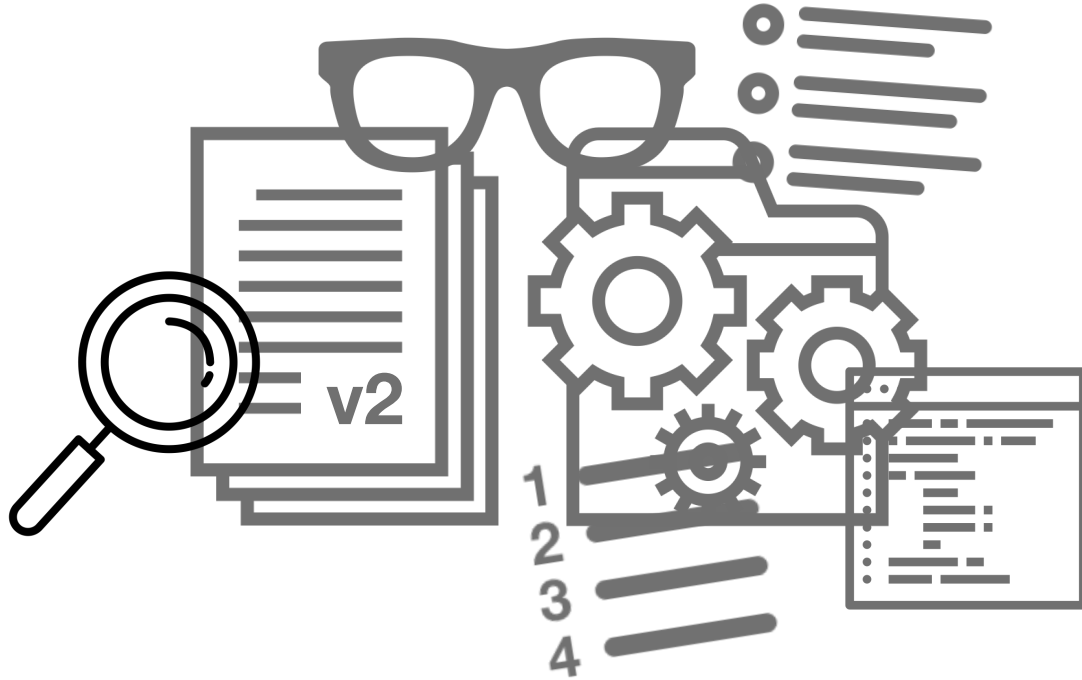
...prioritize system changes against all their other work...



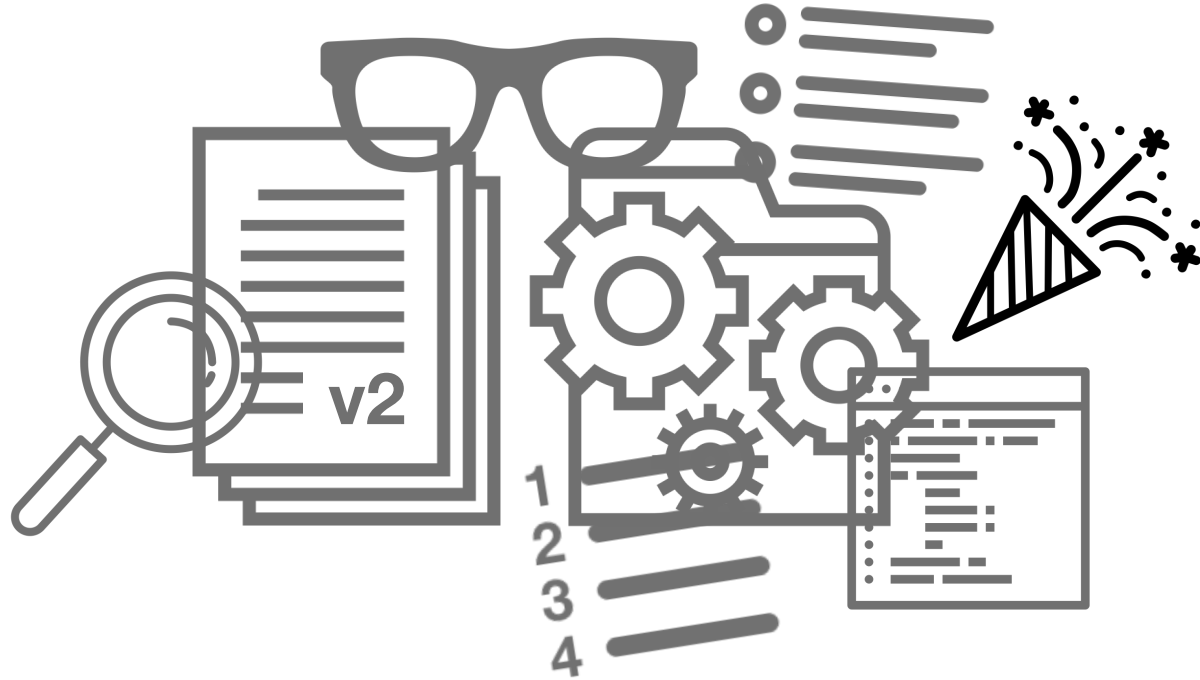
...turn policy into business requirements...



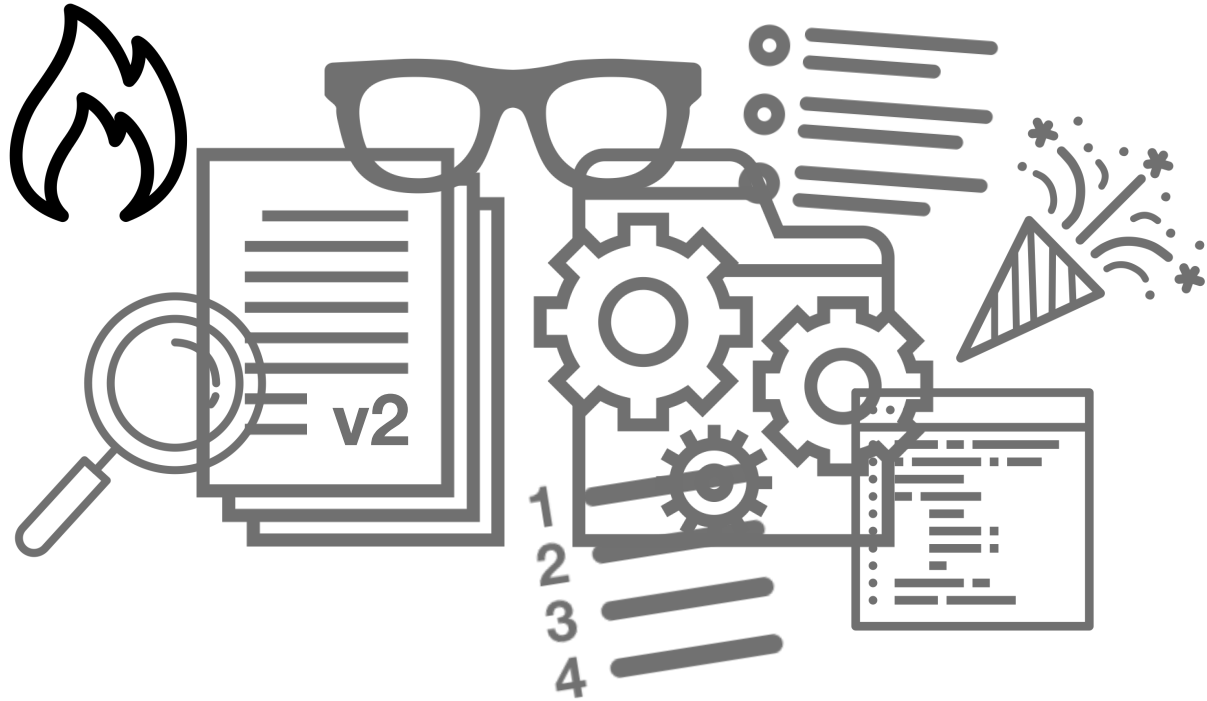
...and procure or conduct implementation work.



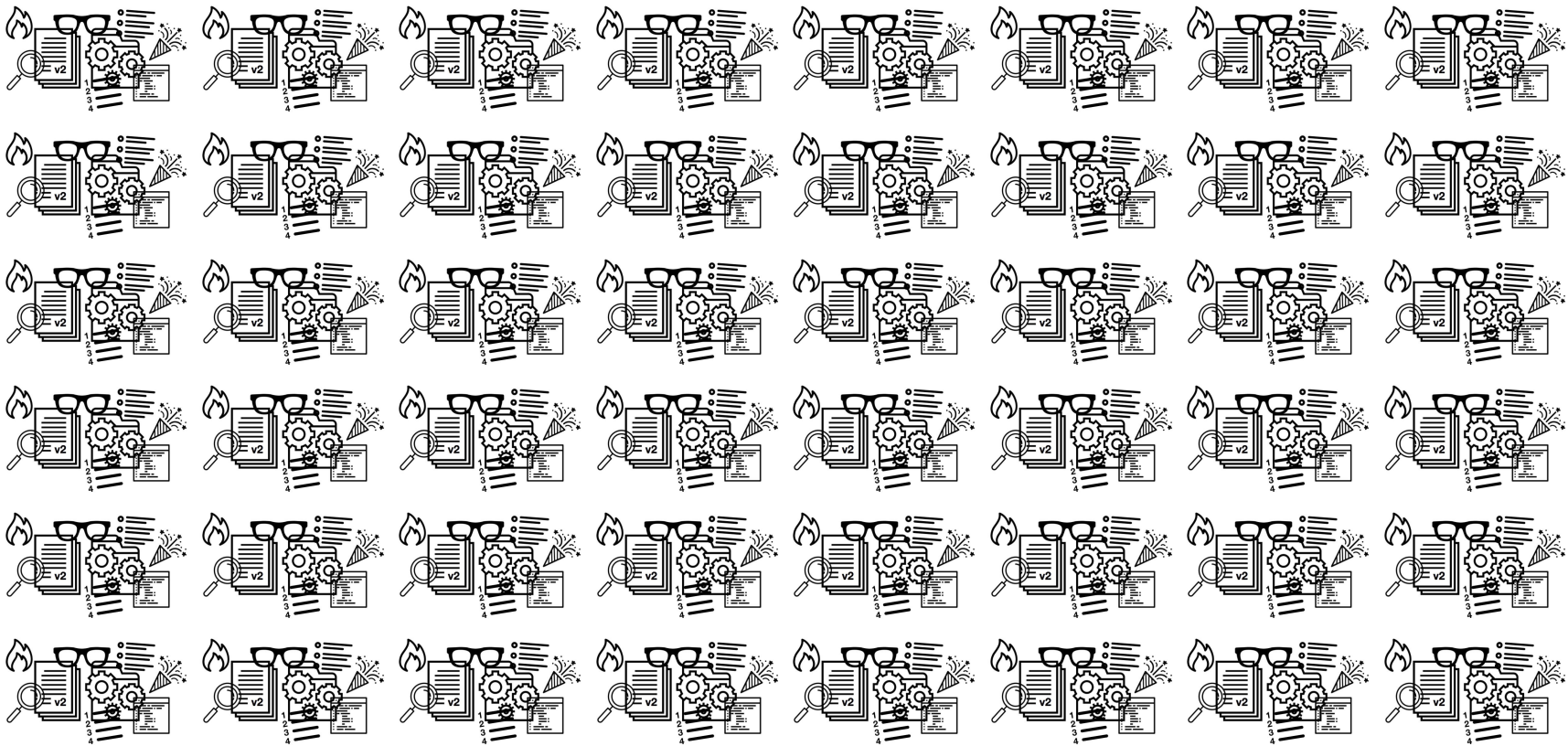
Federal oversight of this progress happens all along.



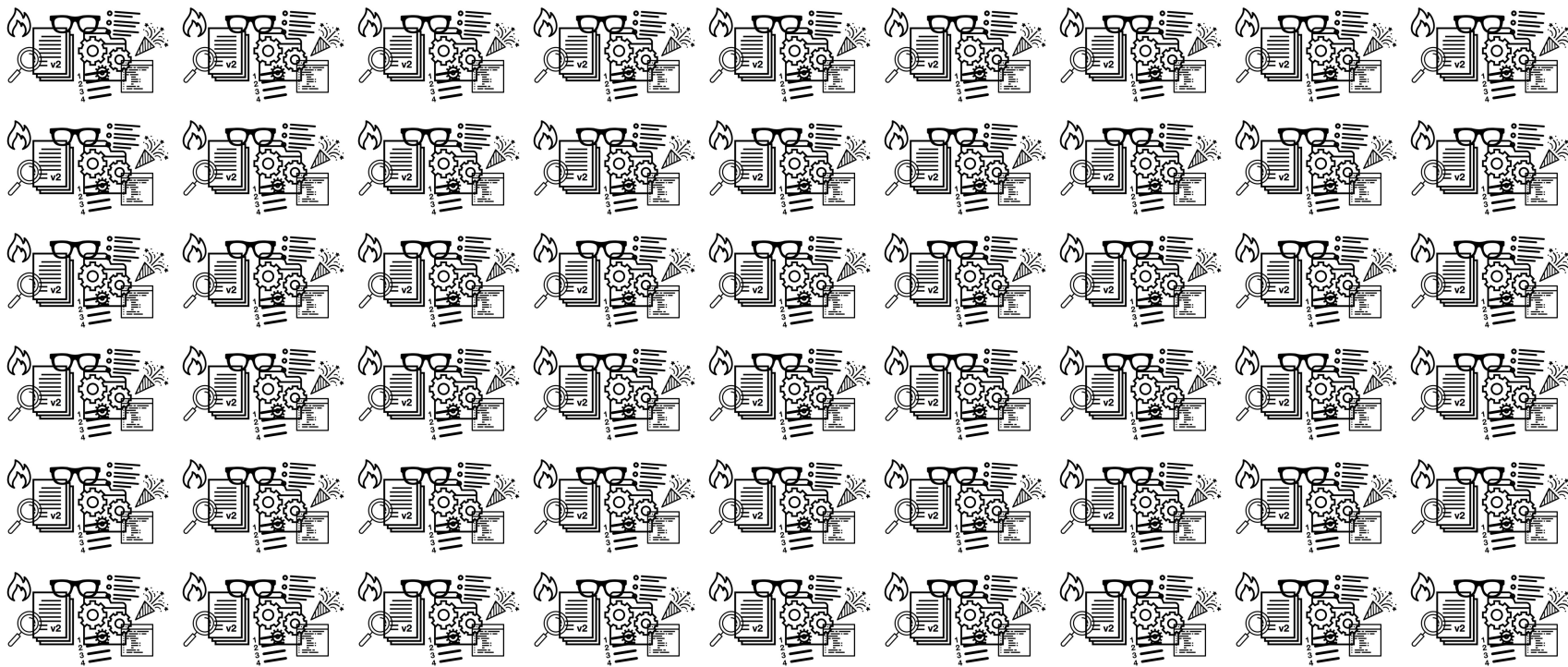
And after all the time, effort, and money, sometimes the process is a success...



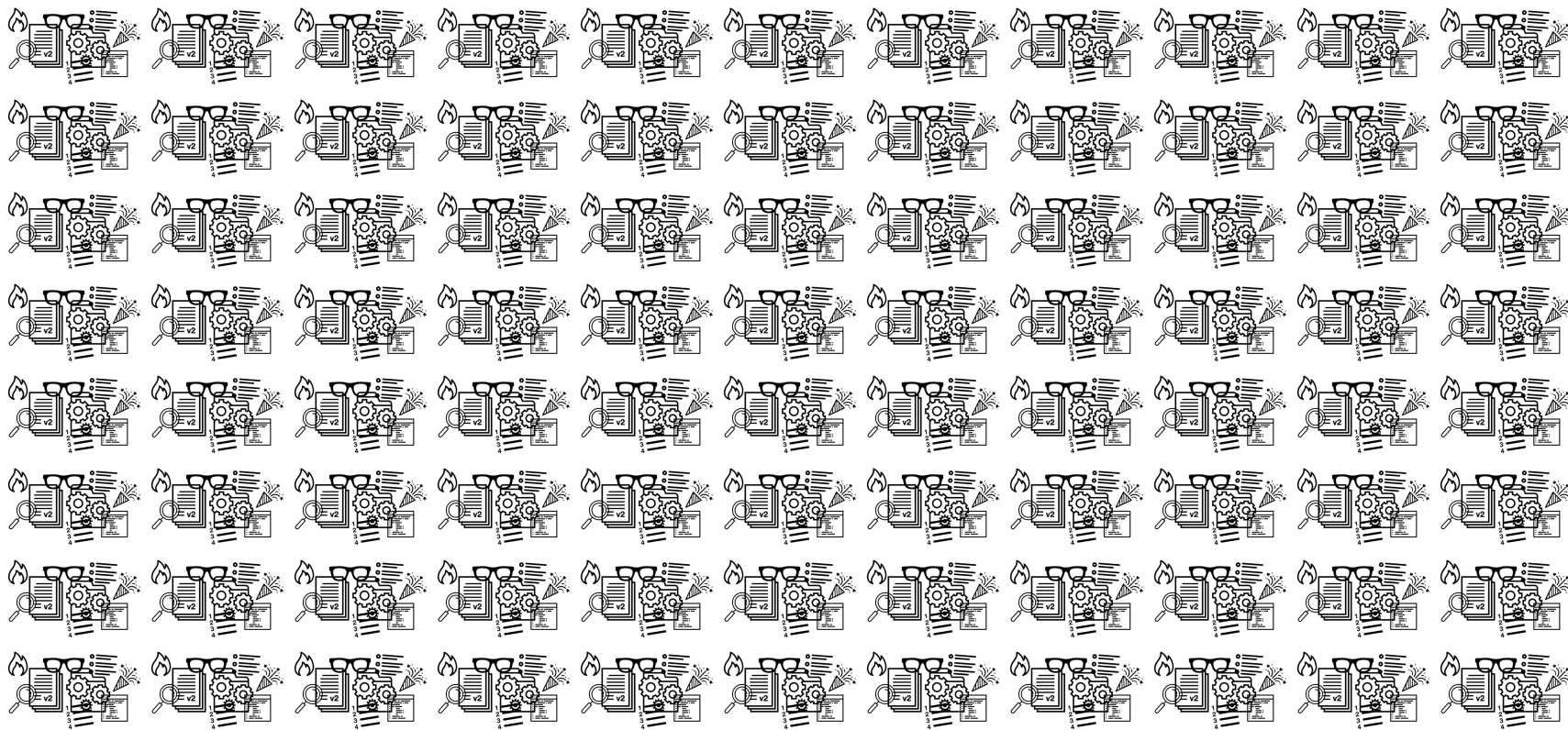
...and sometimes it's not.



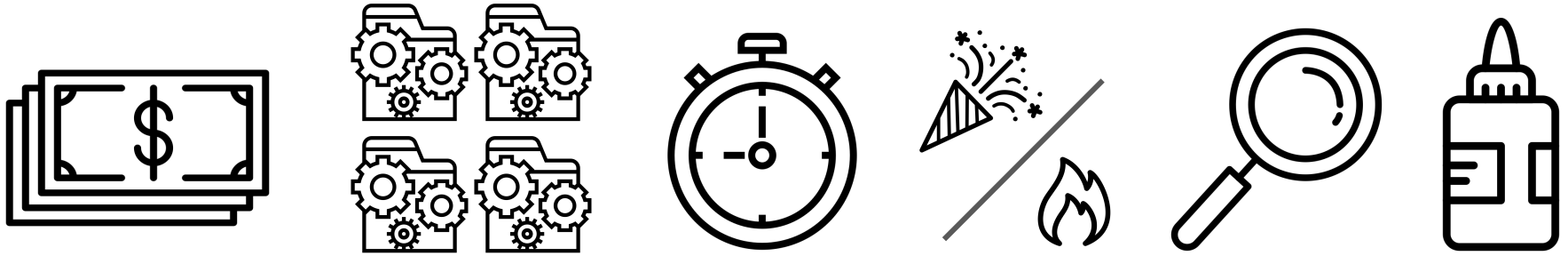
And this happens over and over, in every state...



...and every territory.

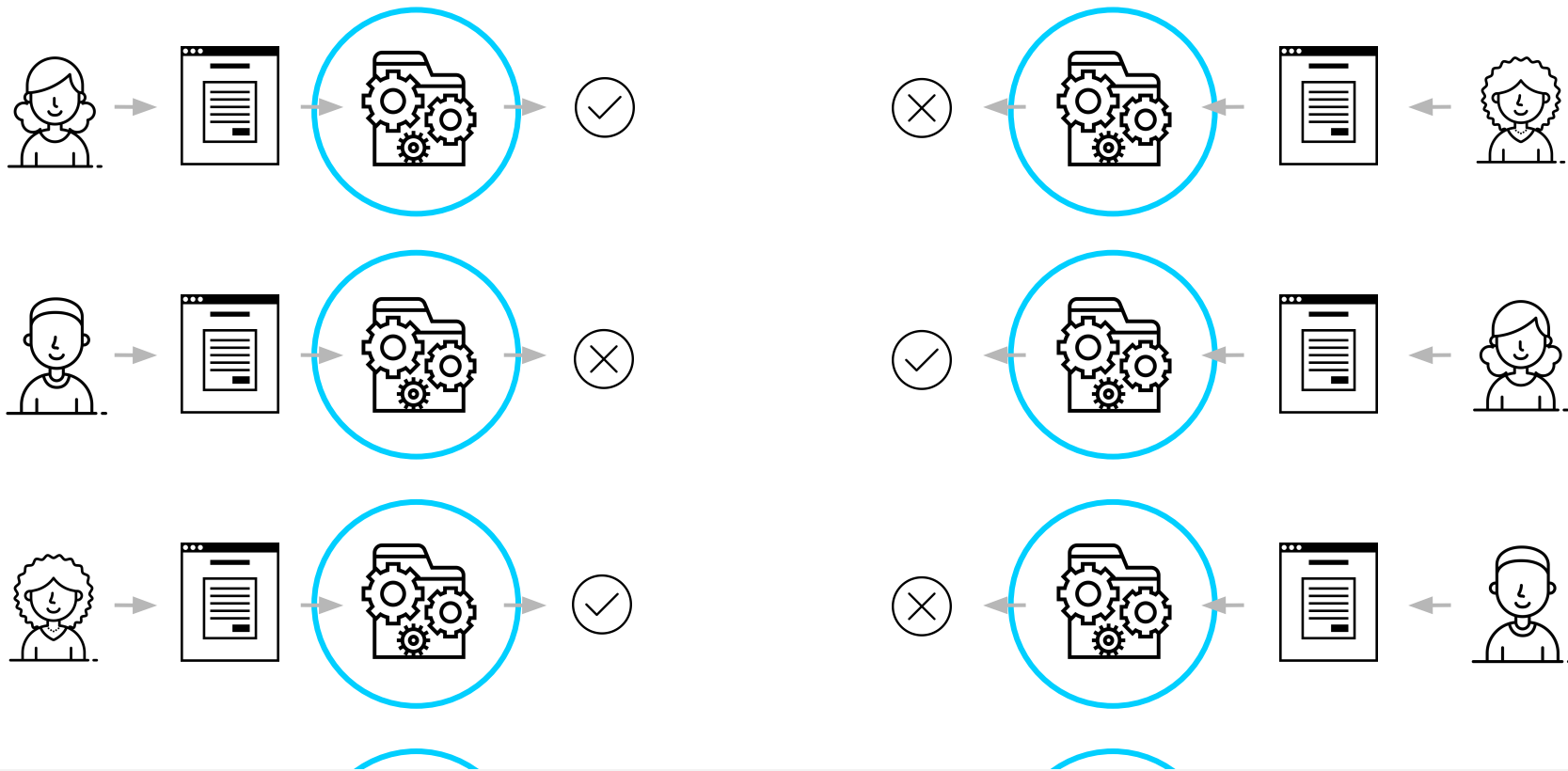


...and sometimes in tribal organizations as well.

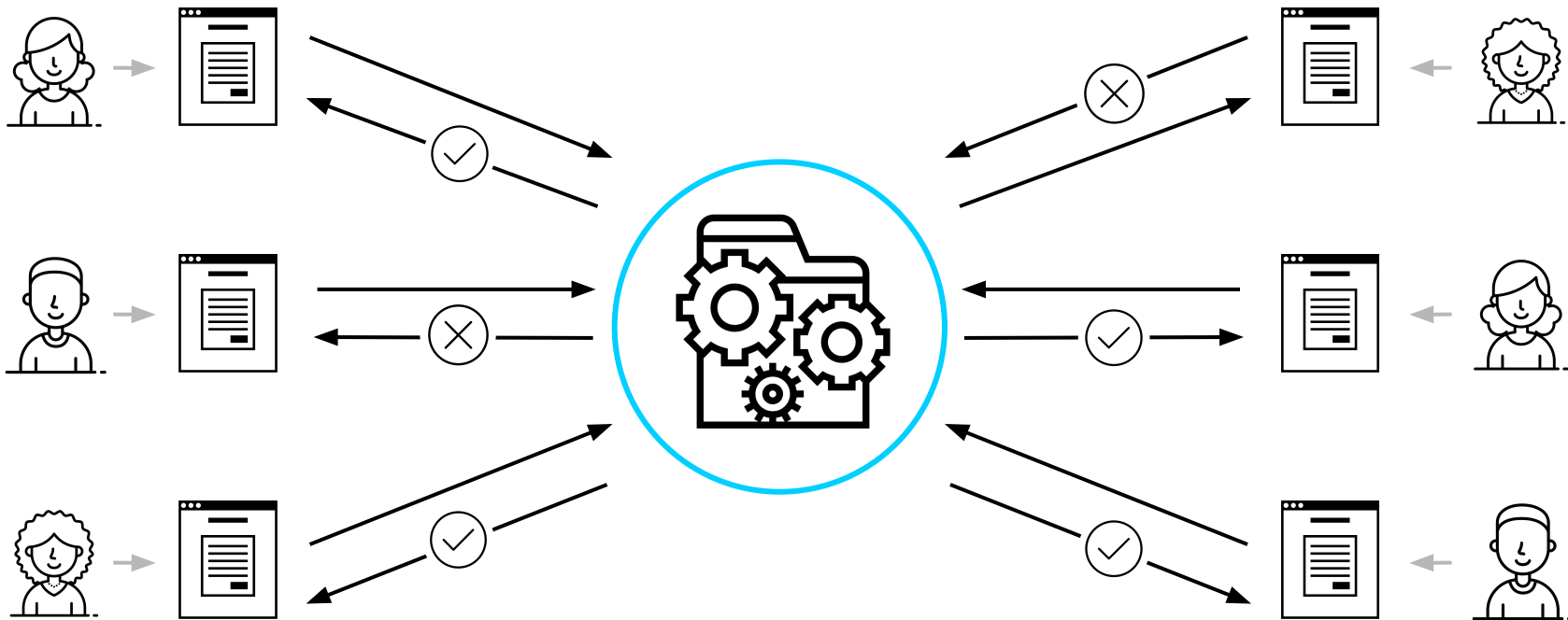


It's expensive, duplicative, slow, risky, and leads to heavy oversight and vendor lock-in.

The opportunity



Rather than each state implementing and managing the rules...



...we're interested in the idea of a shared, centralized rules service.

Benefits

Consistent application of policy

Reduced oversight of state systems

Reduced burden on states

Increased integrity

Reduced redundancy/waste/\$\$\$

The Exploration

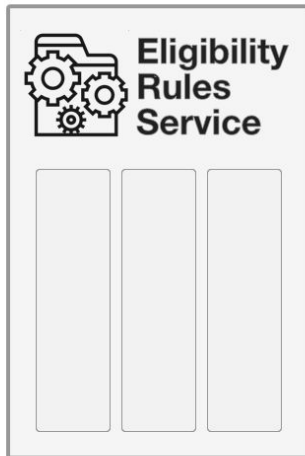
How we work: Investigate the problem, formulate hypotheses, break into pieces (agile/lean), work with users to test hypotheses

First part: Technical feasibility - Can we build a rules service that could accommodate the complexity of varied state policies?

Use case: Chose to work with WIC because the policy varies state-to-state

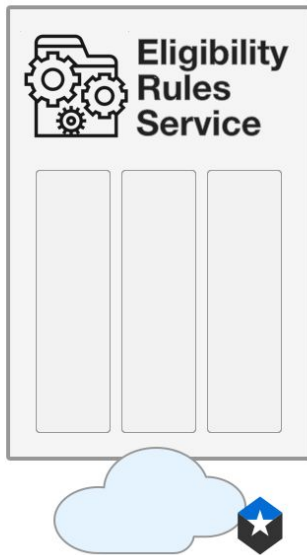
Conclusion: Feasible

How it works



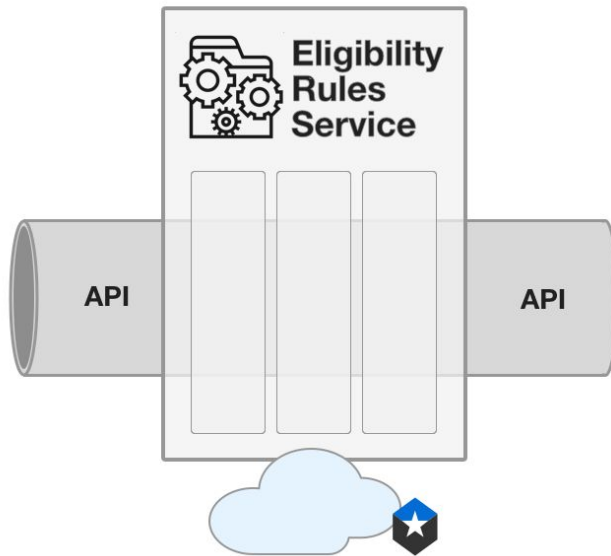
We created a prototype eligibility rules service for the **WIC** program

How it works



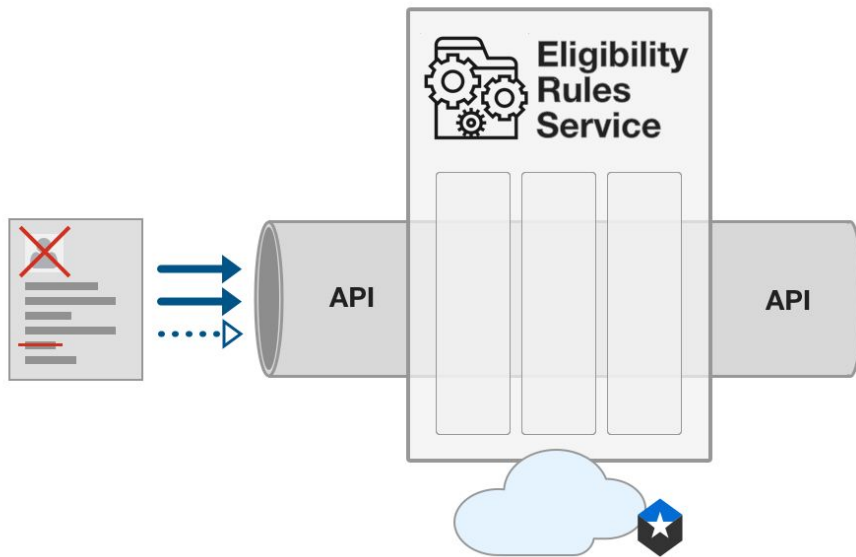
It lives in the cloud, specifically cloud.gov

How it works

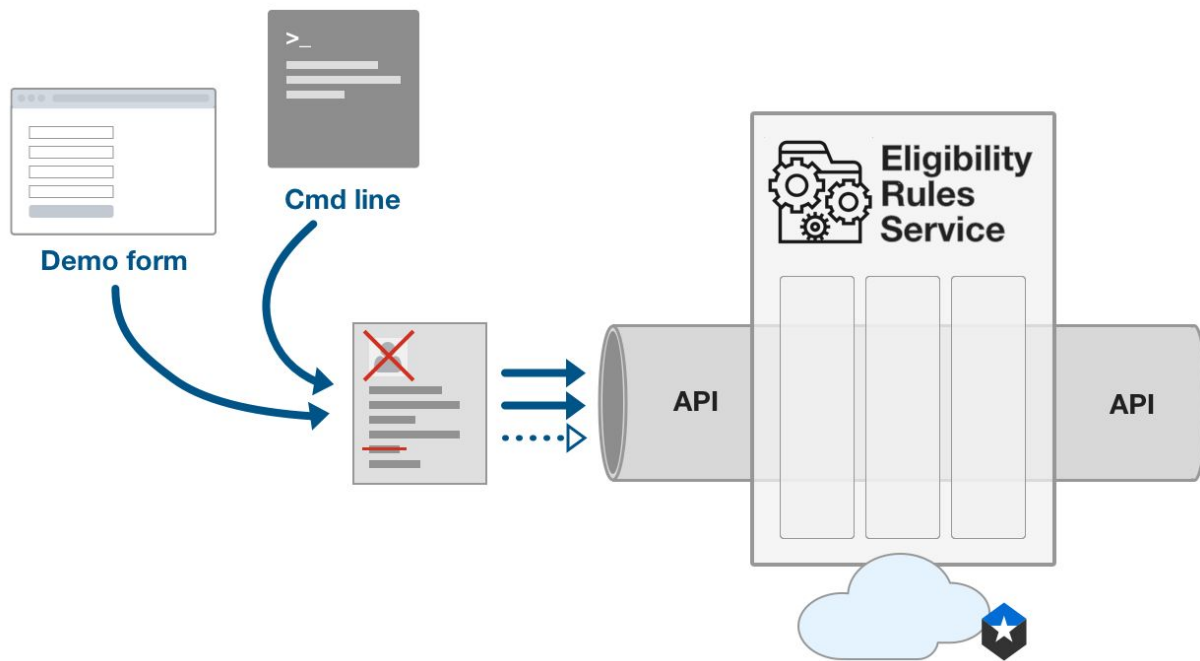


It communicates over the public internet through an API

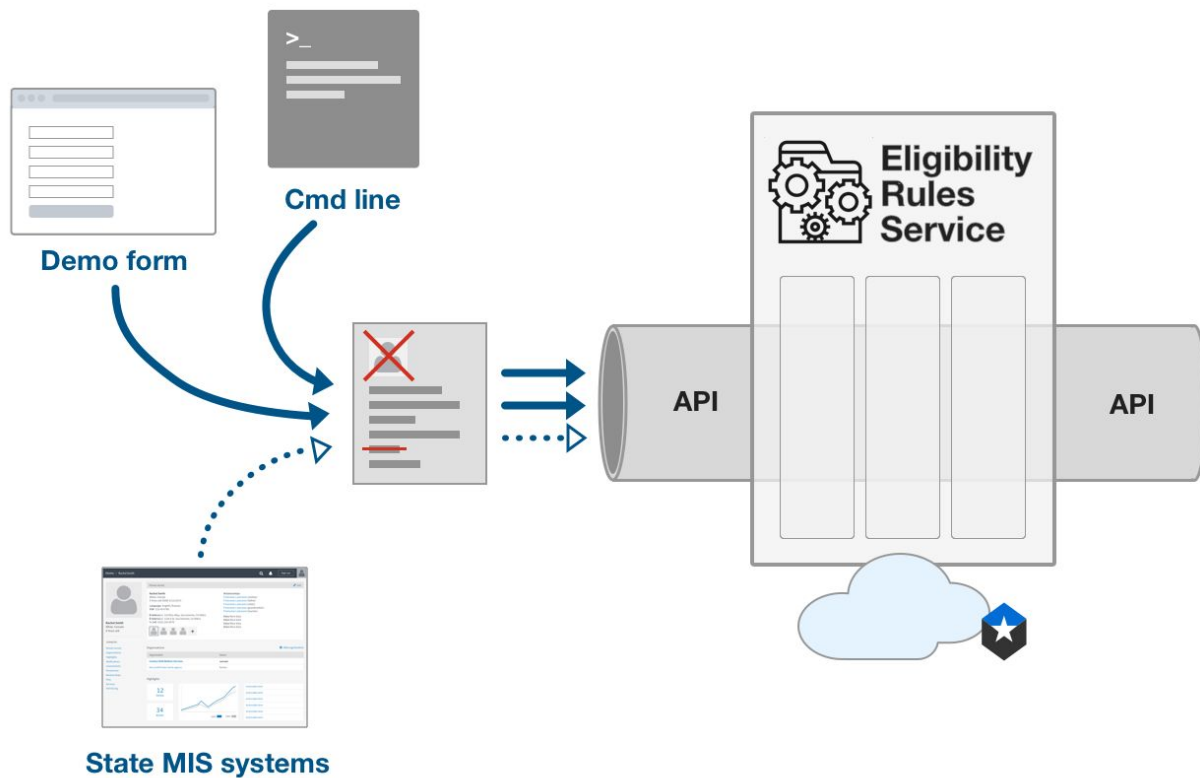
How it works



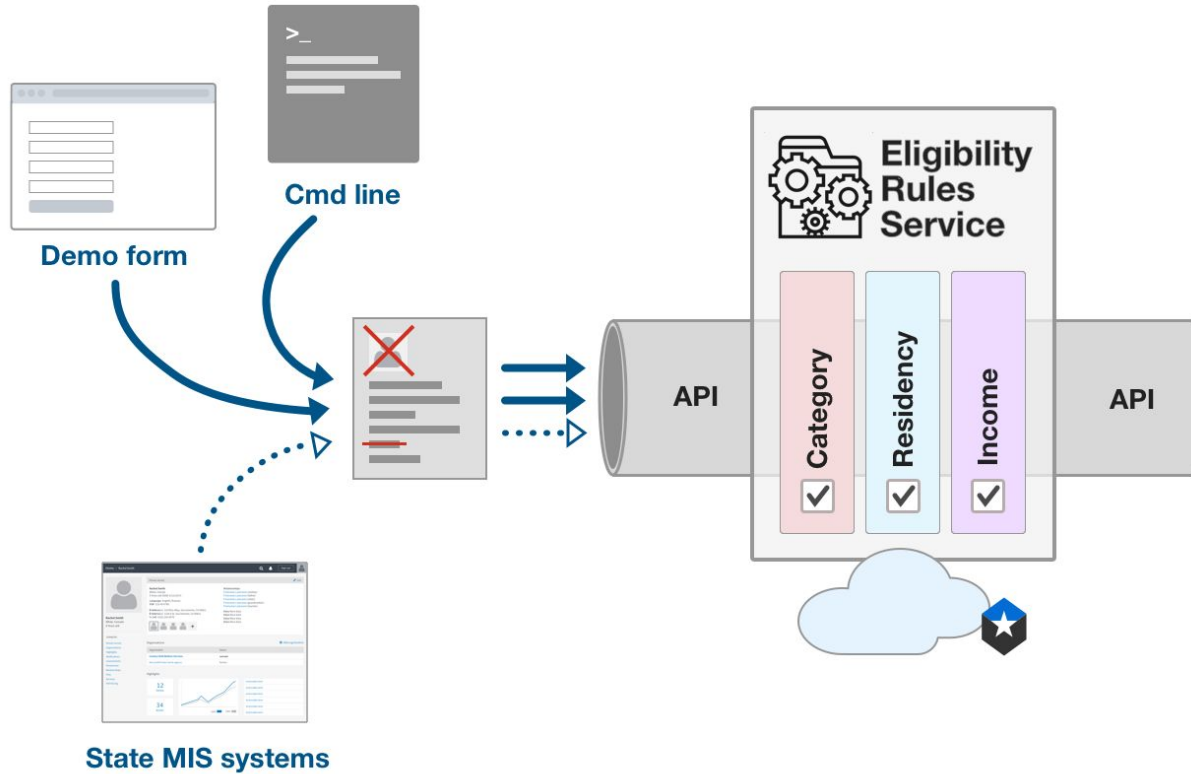
Anonymous applicant data is sent through the API



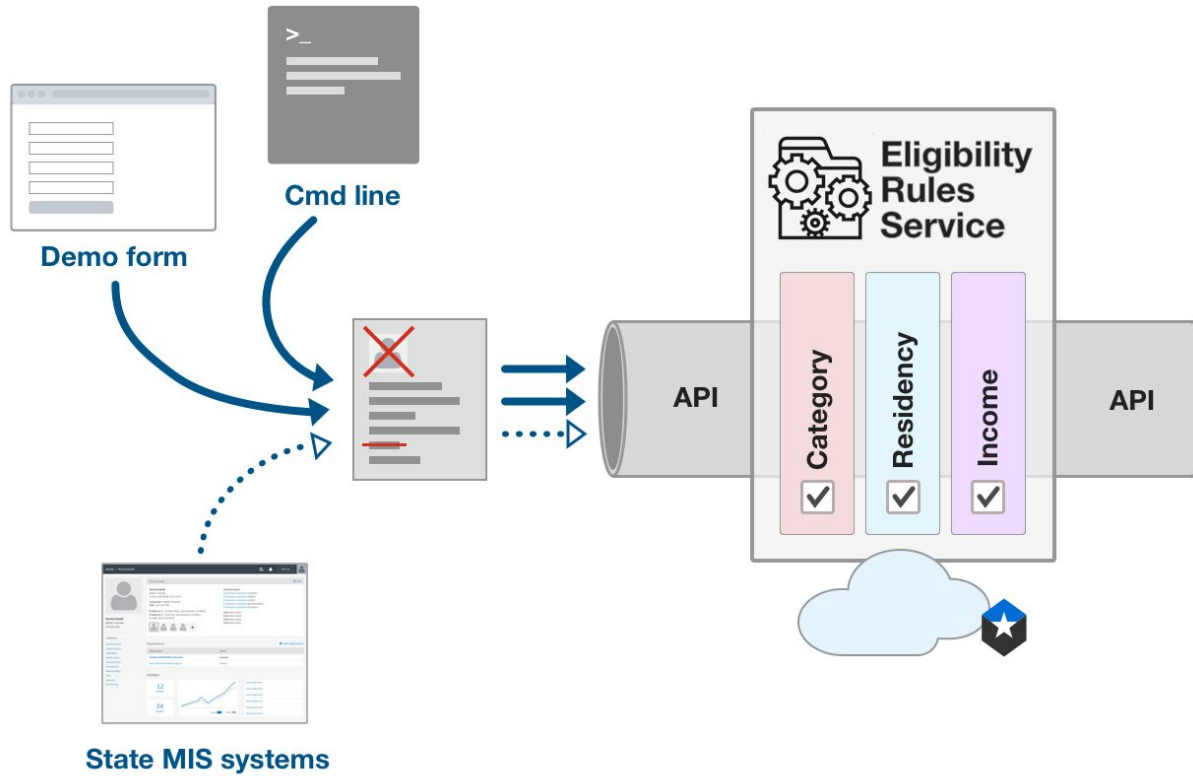
Currently the data is sent through a demo form, or directly from the cmd line



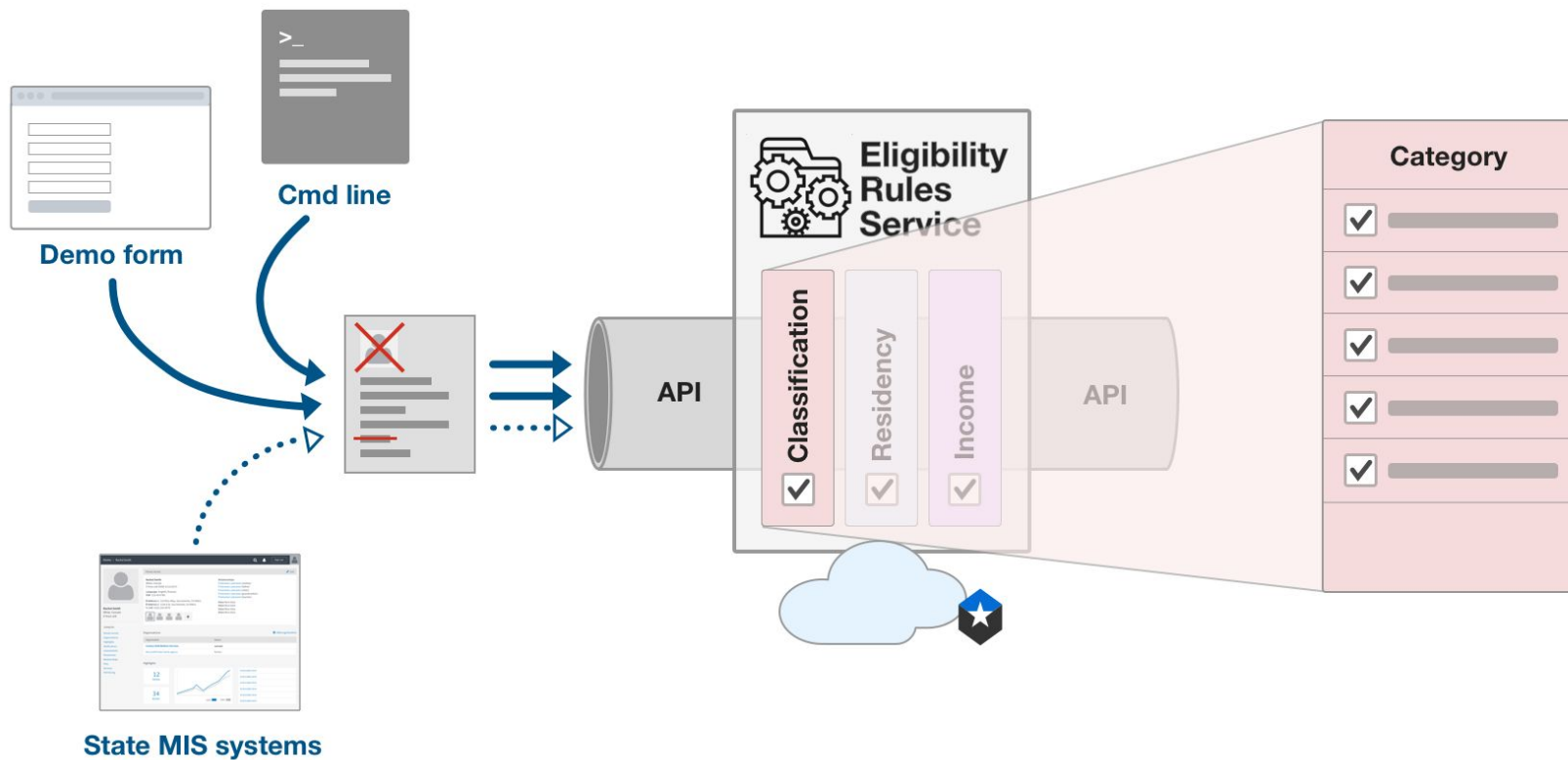
This simulates the eventual sender, the state systems (MIS for WIC)



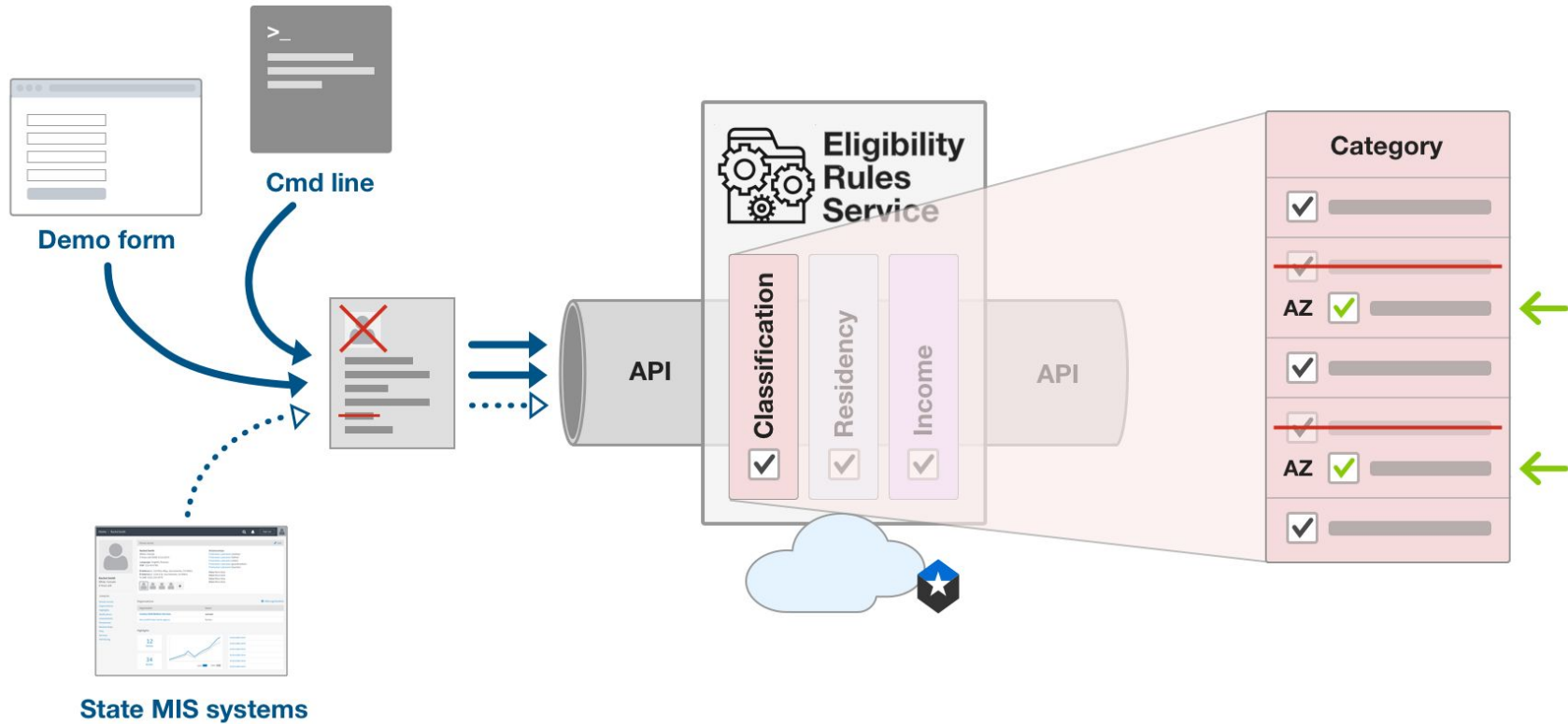
We check the data against the criteria/rules for category, residency, income, and whether these have been verified. Also multiple FPL thresholds



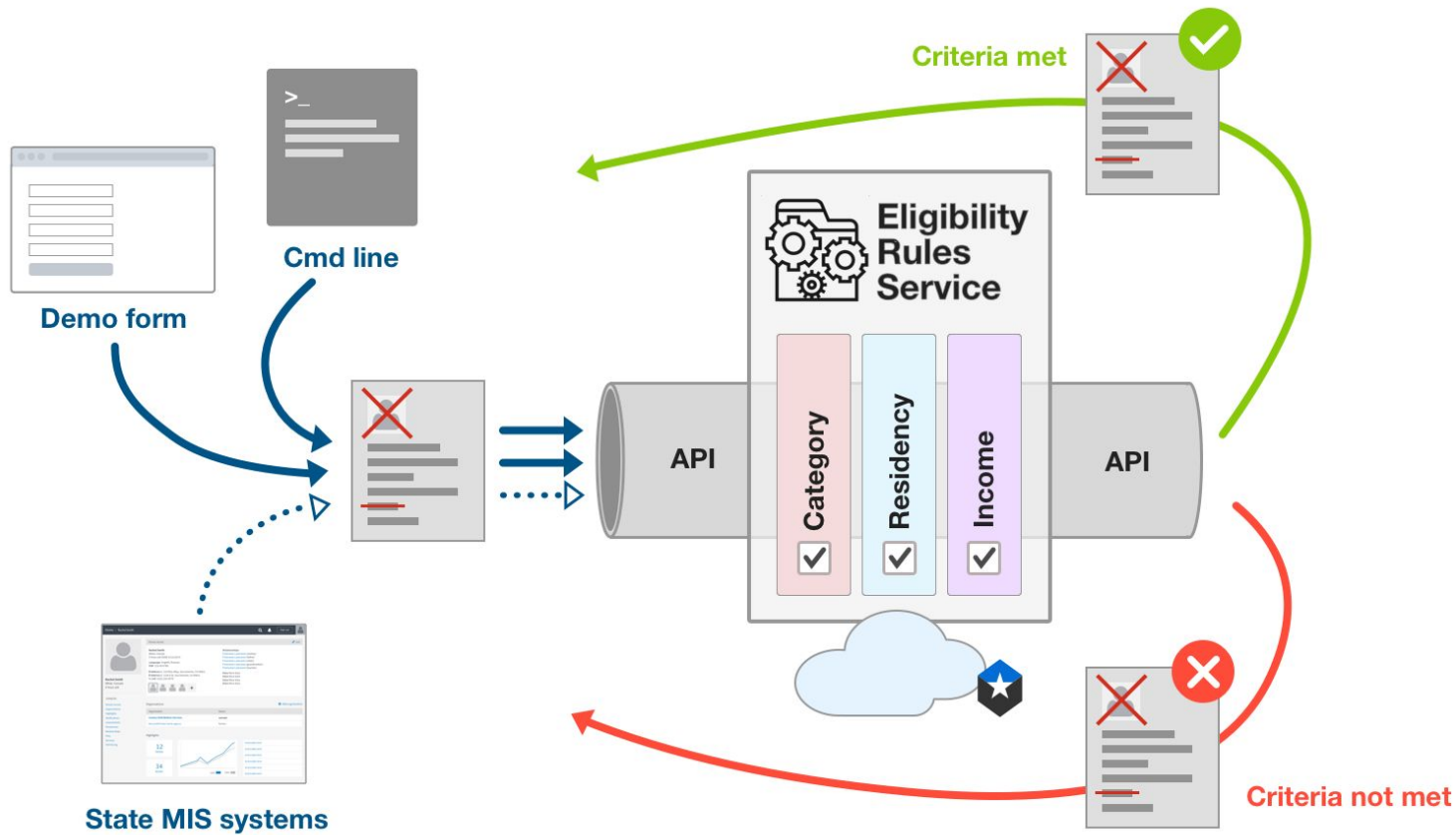
We do not evaluate nutritional eligibility or actually verify income or residency



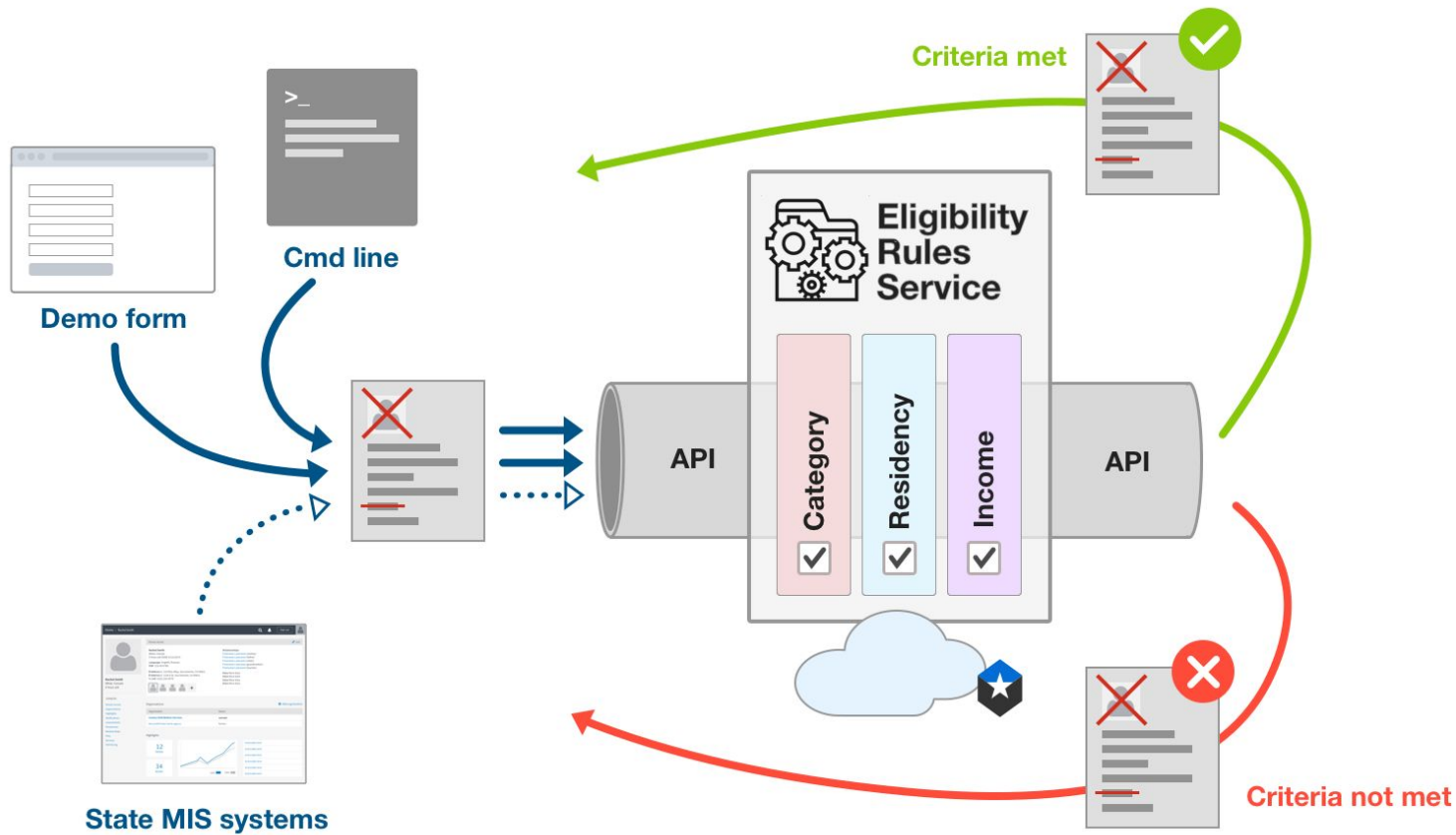
The prototype has a baseline set of WIC eligibility rules based on the federal regs



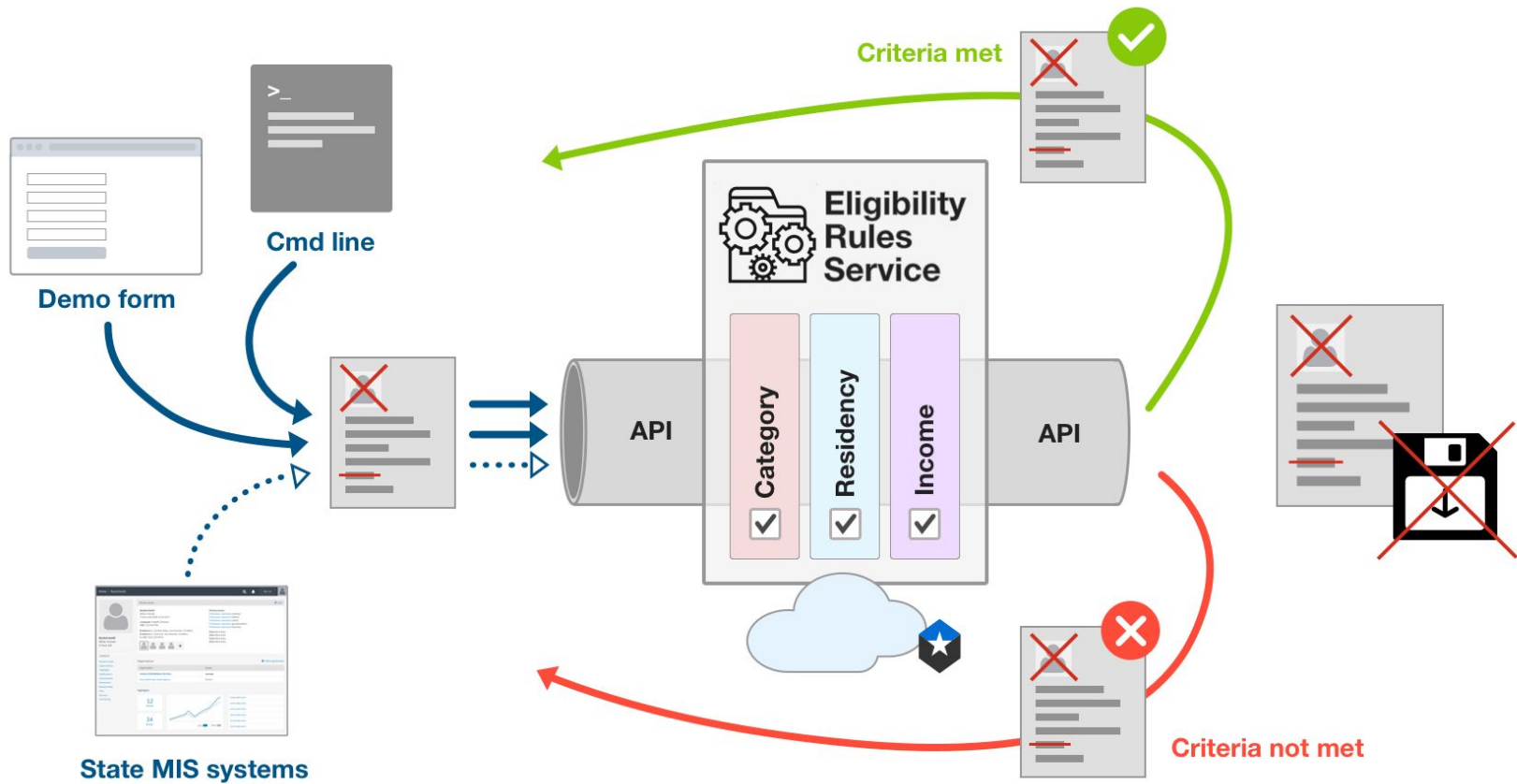
A separate set of rules based on Arizona WIC policy overrides the baseline rules when it's different



We evaluate whether the applicants meet the eligibility criteria, and send a response back to the requestor.



State/territory/tribal orgs can use the response as they make a determination



We do not know the identity of the applicant
We do not save the application data anywhere

Our rules service...

does *NOT*:

store any applicant data

handle any PII/PHI, only anonymous data

make eligibility determinations, that's for states

determine food packages, that's for clinicians

assess nutritional need, that's for clinicians

does:

assess income, residency, category, and whether these have been verified

ascertain whether applicants meet those criteria

define the certification periods

Demonstration

Conclusions

Through our prototype effort...

- We have heard how states struggle with managing changing regulations and policies.
- We have proven that this kind of system can be built, quickly, inexpensively, using only open source tools.
- We have shown a rules service can accommodate varying eligibility criteria from multiple states.

Future exploration

Areas for future exploration:

- Exploring the integration points with state/other systems
- Exploring the federal/state division of responsibilities, which we believe is solvable
- Structuring a pilot
- Developing a program-specific business case

Looking for partners

To move ahead, we need to identify partners interested in pursuing this idea together. We can not do it without users, so we need to find a program to partner.

- We are sharing our learnings (like this)
- Writing blog posts about the work
- Made all our work open source and freely available to the public.

Ownership

- The eventual owner of a system like this would be the agency running the program (FNS/WIC, FNS/SNAP, CMS/Medicaid, ACF/LIHEAP, etc.)
- Ownership would involve:
 - Operating production-ready eligibility rules service
 - Maintaining reliable service up-time/availability
 - Implementing changes when policy challenges
 - Supporting integrations
 - Funding operations

Benefits

Consistent application of policy

Reduced oversight of state systems

Reduced burden on states

Increased integrity

Reduced redundancy/waste/\$\$\$

What collaboration looks like

Defining the rules (~6 weeks)

Federal collaborators

- Advise on policy and technical matters
- ~3 hr/week for a policy and a tech contact
- Light email correspondence
- Provide access to state contacts
- No financial commitment

State collaborators

- Share information about state plans and direction
- Advise on state policy and technical matters
- Provide access to people from different parts of the org (e.g. policy, program, IT) for research purposes
- ~20 hrs total time
- No financial commitment

Researching integrations (~14 weeks)

- Advise on policy and technical matters
- ~3 hr/week for a policy and a tech contact
- Provide test data
- Participate in testing and provide feedback
- No financial commitment

- Advise on state policy and technical matters
- Provide continued access to people from different parts of the org (e.g. policy, program, IT)
- Provide test data
- Participate in testing and provide feedback
- ~60 hrs total time
- No financial commitment

Future

- Be part of conversations about the service's future
- Willingness to *consider* taking ownership of the product moving forward.

Image credits

Open source icons from The Noun Project



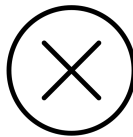
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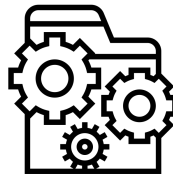
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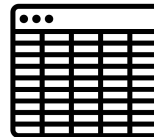
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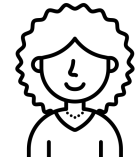
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