The high cost of income verification in the real world

Recent learnings and opportunities for state benefit programs

Aspen Financial Resiliency Summit, April 9th 2024

Agenda

Introduction to the IVaaS project
Why income verification is so challenging
An example journey
Costs discussion
Opportunity discussion

Our goal is to create a verification process that is inclusive, transparent, trustworthy, integrated, and efficient.



Applicants should only have to provide information the state doesn't already have, the information they need to submit should be clear, and it should be quick and easy to provide the information needed.

Caseworkers should feel confident about the verifications they receive and should spend minimal time requesting documentation from clients.

States should be able to focus and optimize their budgets on benefits over administration and technology costs.

Research to date

20+ interviews with states

9 interviews with community benefit organizations

5 interviews with recent benefits applicants

1 state site visit

• Interviews with 12 caseworkers, and observation of 7 SNAP interviews and 2 SNAP applications

Opportunity areas

Centralized data sources

Commercial data sources

Centralized access to databases that sell income checks for social services organizations

Government wage data

Accessing or cascading through gov databases before using costly alternatives

Plain language tools to report income

Smart document uploader

Using the latest technology to ease some applicant burden and improve the quality of documents submitted to agencies

Consent based verification

Helping applicants use their credentials (login and password) to access their pay information on digital platforms

Digital self-attestations

Helping those who struggle to verify their income generate a legal statement with details and assurances that agencies need

Guided expense reporting

Helping self-employed applicants report their business related expenses in a way that works for agencies

Why is income verification so challenging?

Current processes are designed for steady income and traditional employment

Overly complex and confusing questions increase burden and harm applicant outcomes

Incomplete or illegible documents are a major source of administrative burden

Caseworkers need confidence and spend time or require more proof to get it.

CSI contracts can help but are increasingly expensive, and results vary significantly

Income verification relies on a patchwork of tools and data sources, varying in design and quality across states.

Current processes are designed for steady income and traditional employment

Among workers with incomes below 200% of the FPL in December 2020:

44.4% reported nonstandard work arrangements

35.9% reported nonstandard work as their main job.

Income verification is hardest for:

W2 workers who do not match in Commercial Sources of

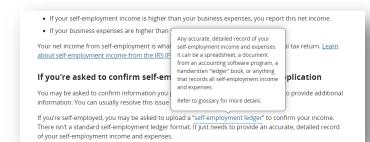
Income like The Work Number (SNAP)

Self-employed workers

Workers with variable income or multiple jobs (SNAP)

Medicaid's Federal Hub makes it easier, but applicants are asked to document self-employment income that isn't easily matched in data sources.

SNAP largely relies on earners to provide documentation in the form of paystubs that is not readily available; many applicants are paid by direct deposit, digital app, personal check, or cash.



Directions for self-employed applicants on healthcare.gov

Work Record For		SSN		_ Case ID		
be verified, yo	a record of money that you earn from doing any typ. In there to spend on things such as gas, supplies, to. St. You may ask the person for whom you week, to. For failure to do this could result in denial or delay orm to your worker by	e of work and write the amount you i epairs, etc. needed to work and write fill in the information for you. It is yo of your benefits.	eceive in the space helow	marked IIC	Wages". Also k marked "Expens ou earn. Since a	eep a record o es.". You mus Il income mus
Date Worked	Name and Phone Number of Person You Worked For	Address of Person You Worked For	Type of Work	Gross Wages	Expenses	No. of Hours Worked
-						-
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information	contained on this form is true and accurate.	Date		<u> </u>		
nt Signature						

A state's wage record form (SNAP)

Complex and confusing questions increase burden and harm applicant outcomes

There are many common employment scenarios (like variable work schedules, and self-employment) that increase the applicant's cognitive burden of providing the information that agencies need.

Confusing income questions and jargon can lead to failures in automatic verification because the applicant's information deviated from a database record.

When applicants do not understand directions for what verification to send, they may not supply the right proof, and cases can show as pending in the system.

Populations with low English proficiency, low literacy or cognitive disabilities may require one on one support from community benefit organizations or other individuals to get through an application.

Caseworker

"We get a lot of info that's incomplete or incorrect and it take a lot of effort to get in touch with employers."

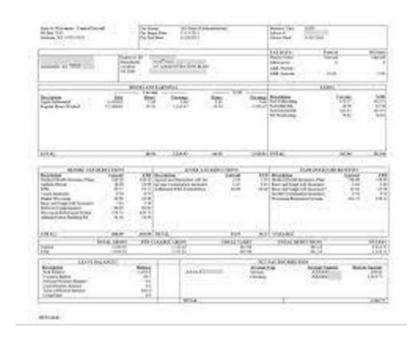
Incomplete or illegible documents are a major source of administrative burden

Caseworkers we spoke to estimated that one in every ten (1/10) documents that they review are blurry, distorted, or are otherwise illegible in one state.

Of the documents that are legible, some arrive without required signatures or information, such as Employer Name, Client Name, Dates, and Amounts for paystubs.

Making paystubs or statements digital by taking a photo with a mobile phone can be challenging especially for applicants with low technology understanding or use.

A constellation of technologies is available for uploading, interpreting, and verifying documentation that could ease some burden on applicants, but they may not be used in current state systems



Caseworkers struggle to interpret pixellated or blurry verifications.

Caseworkers need confidence and spend time or ask for more proof to get it.

When applicant-supplied information doesn't closely match database records, or applicants cannot clearly explain the details of their financial lives, caseworkers need to follow up.

Caseworkers told us that they sometimes walk applicants through their income and expenses to help identify all sources of income.

Caseworkers often ask applicants who do odd jobs, cash work, freelance or provide independent services to do more work to get proof of their income.

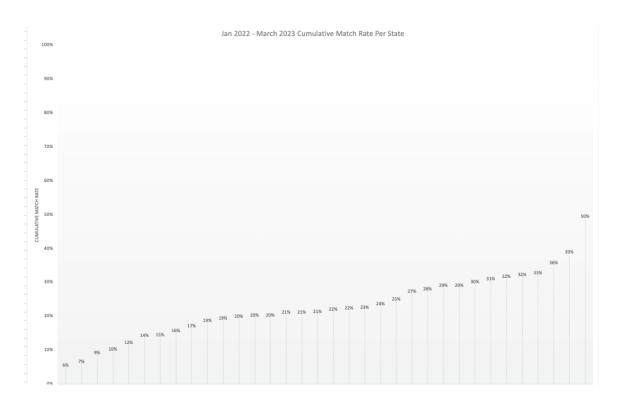
Across states, methods for supplying additional proof can vary from client handwritten self-attestations and profit and loss ledger forms to providing names and phone numbers for family members or clients for case workers to talk or send forms to.

Documentation that would benefit a client, like proof of monthly selfemployment expenses, is particularly hard to supply.

Commercial sources of income (CSIs) can help but are increasingly expensive, and results vary significantly

Coverage within the two main providers of commercial sources of income is limited by which employers contract with the CSI providers and employers needing to report timely payroll information.

In our analysis of a commercial income verification solution, no state programs saw higher than a 50% cumulative match rate over the course of a year with the lowest match rate at 6%



Match rates by state vary significantly

Income verification relies on a patchwork of tools and data sources, varying in design and quality across states.

TOOLS USED		CHALLENGES		
PAPER ONLINE	 Paper forms and notices Paper applications Online applications and portals Document uploaders and document management systems 	 Content isn't always in plain language Limited usability or functionality in online tools Written and designed primarily for steady income Understanding what proof to submit takes time and support. Agency staff often have to manually sort or match of submitted documents 		
DATA	 Commercial Sources of Income (CSI) State government & county agency data Benefit program data Federal Data Hub (Medicaid) 	 CSI contracts are expensive CSI contracts support W2 earners, not self employed earners CSI databases have limited coverage Government data is siloed & requires both agreements and technical integration 		

Real life income verification scenarios

- Walk through an example of a self-employed applicant whose income is hard to verify.
- 2. Talk about the costs associated with verifying this income.
- 3. Discuss two other hard to verify situations.

Income verification is not one moment. It is a series of steps that are not always linear.

Identify Proof

Learning what documents are needed to prove income and what it will take to obtain those documents.

Gather Proof

Obtaining records, logging information, reaching out to employers, and creating documents that prove income.

Submit Proof

Share all this proof back with the state in whichever way is available and most convenient.

Categorize Proof

On the back-end, clerical workers and caseworkers sort, assign, and assess the information submitted.

This can start the process over again.

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Finding literacy support, multi-language support, and physical access support compounds the burden of navigating these steps.

Amelia

SNAP

Medicaid

6 children under 18

Cleans homes and sells baked goods

SCENARIOS

Burton

Medicaid

Lives alone

Actor and Gig App worker

SCENARIOS

Nic

SNAP

Lives with roommates
Home Health worker

DISCUSSION ONE

The cost of hard to verify income

Break into your table/groups and talk about the costs associated with these scenarios

- 1. Refer to your print outs or come up to the front to check out the map
- 2. Use green stickies for state expenses and pink stickies for applicant difficulties.
- 3. Pick your top 3 as a group

After 10 minutes in small groups, we'll discuss and place your green stickies on the map

Where are the opportunities to improve the income verification process and address the pain points we discussed earlier in your state?

In your table groups, think about the scenarios we've talked about and how costly this process is, **especially for those that have hard-to-verify income**.

- What improvements have been tried in your state? What would you like the state to try?
- What could you do now? What could you do you in 5 years? ...In 10 years?

DISCUSSION THREE

Your Input

Now that we've highlighted pain points and potential opportunities to reduce the cost of income verification in the last two discussions, we'd like your input on what our team can do to help!

- We'll walk through 6 opportunity areas and we want to know if they would help ease the pain points you identified and if they would reduce costs.
- 2. Then, you'll use stickers and stickies to tell us what you think on the charts around the room.
 - 1. Add green dots to **two** charts you think would most help your state, organization, or applicants you work with
 - 2. Add a red dot to any ideas you wouldn't be able to or want to use
 - 3. Write questions on sticky notes
- 3. Have other ideas for us? Add to the ideas space!

Opportunity areas we're considering

Centralized data sources

Commercial data sources

Centralized access to databases that sell income checks for social services organizations

Government wage data

Accessing or cascading through gov databases before using costly alternatives

Plain language tools to report income

Smart document uploader

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Consent based verification

Helping applicants use their credentials (login and password) to access their pay information on digital platforms

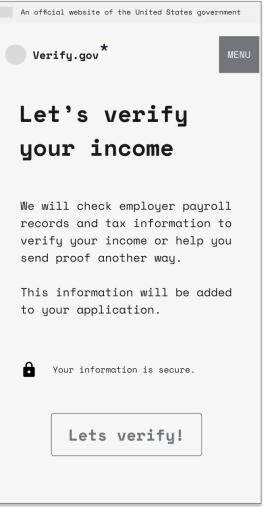
Digital self-attestations

Helping those who struggle to verify their income generate a legal statement with details and assurances that agencies need

Guided expense reporting

Helping self-employed applicants report their business related expenses in a way that works for agencies

We are exploring the impact of a federally owned income verification site with a suite of tools for applicants and caseworkers.



*working concept name

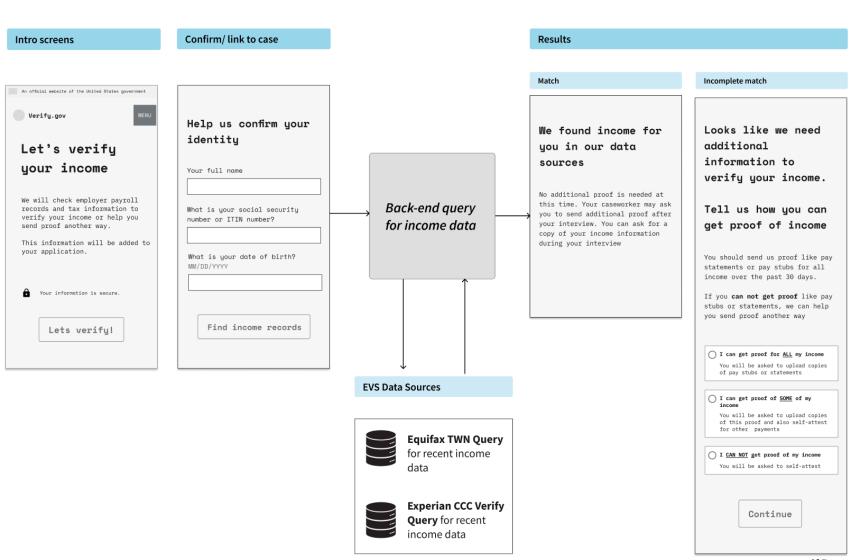
Potential Tools

Commercial data sources

Centralized access to databases that sell income checks for social services organizations

Access commercial sources of income through a central location and federal contract.

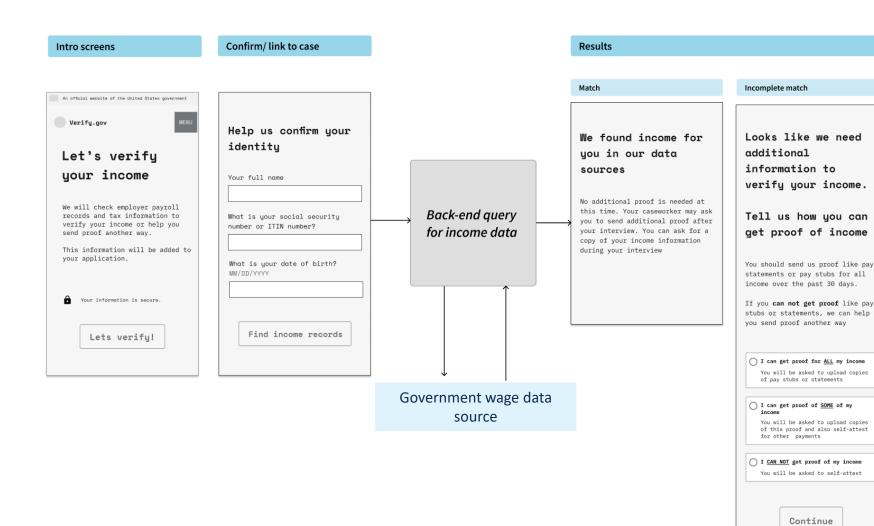
Results are delivered to caseworkers.



Government Wage Data

Accessing or cascading through government databases before using costly alternatives

Explore leveraging government owned data sources for income information, like Quarterly Wage Data, and explore opportunities for data sharing across programs. Evaluate effectiveness and explore waivers.

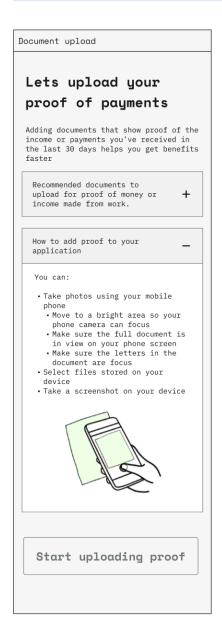


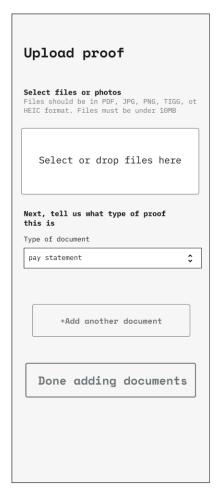
Smart document uploader

Using the latest technology to ease some applicant burden and improve the quality of documents submitted

Provides plain language guidance around what documents to upload, confirms the documents are legible, and delivers to existing caseworker tools

Document upload





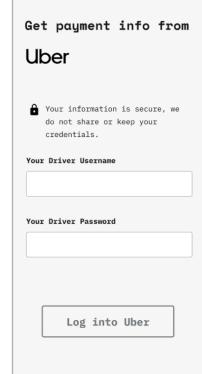
Consent Based Verification

Allowing applicants to use their login credentials (username and password) to access their pay information on digital platforms

Applicants could log in their contract or full time employer's platform or payroll provider from within the federal tool and could then consent to providing payroll information to the state.

Consent-Based Verification









Digital selfattestation

Supporting people who struggle to verify their income in generating a legal statement with details and assurances that agencies need

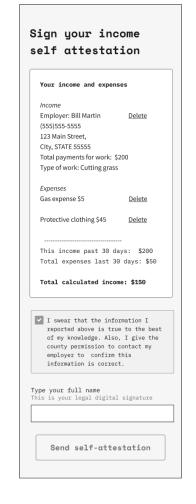
Applicants would be guided through entering their hard to verify income into the tool and attesting to a legal statement. The tool would create a standard report for caseworkers.

Digital self-attestations

Helping those who struggle to verify their income generate a legal statement with details and assurances that agencies need

Self-Attestation Self-attestation Add cash employer/client and expenses Lets add the people or companies who Add the first person Would you like to have paid you in the or company who has add another person last 30 days paid you in the last or company who paid you in the last 30 We'll add the people or companies you 30 days provide a service for one by one. Then, days? you'll legally sign this income Only add a person or company who has statement. paid you cash, check, or ACH payment in Add another person or company below. the last 30 days. We may need to contact your employer to verify this information We made need to contact this person or Your work company for additional verification Bill Martin Delete (555)555-5555 + Add a person or company 123 Main Street, What is the name of the person or company you worked for in the last 30 days? State, STATE 55555 cutting grass Gas expense <u>Delete</u> What is their phone number? · Protective clothing \$45 What is their mailing address? This income past 30 days: \$200 Total expenses last 30 days: \$50 Total calculated income: \$150 Continue +Add another person or company

Sign and send



Done adding people or companies who paid me

Guided expense reporting

Helping self-employed applicants report their business-related expenses in a way that works for agencies

Applicants would be guided through entering their business-related expenses. A standard report is then provided to caseworkers.

Guided Expense Reporting

Lets add expenses for the work you did for [organization]

We'll add expenses one at a time.

You may need to show proof of these expenses in the form of invoices, receipts or bank or credit card charges.

What are some examples of expenses?

Expenses from self employed work are the things you spent money on in order to be able to complete the work that do. For example:

- Gas
- Suppplies like cleaning supplies, work clothing, tape, brushes, nails, fertilizer
- · Tools like

What is the expense

Monthly amount of expense If expense is yearly, divide by 12

\$

+ Add another expense

Done adding expenses

Confirm your income and expenses over the past 30 days

This information will be sent to your caseworker after you enter your self attestation

Your work

- Sally O'Hare <u>Delete</u> (555)555-5555
- 123 Main Street, State, STATE 55555
- cutting grass

• Expense: gas \$10

Delete

• Bill Martin <u>Delete</u> (555)555-5555 123 Main Street,

State, STATE 55555 \$200 cutting grass

Expense gas

pense gas <u>Delete</u> 10

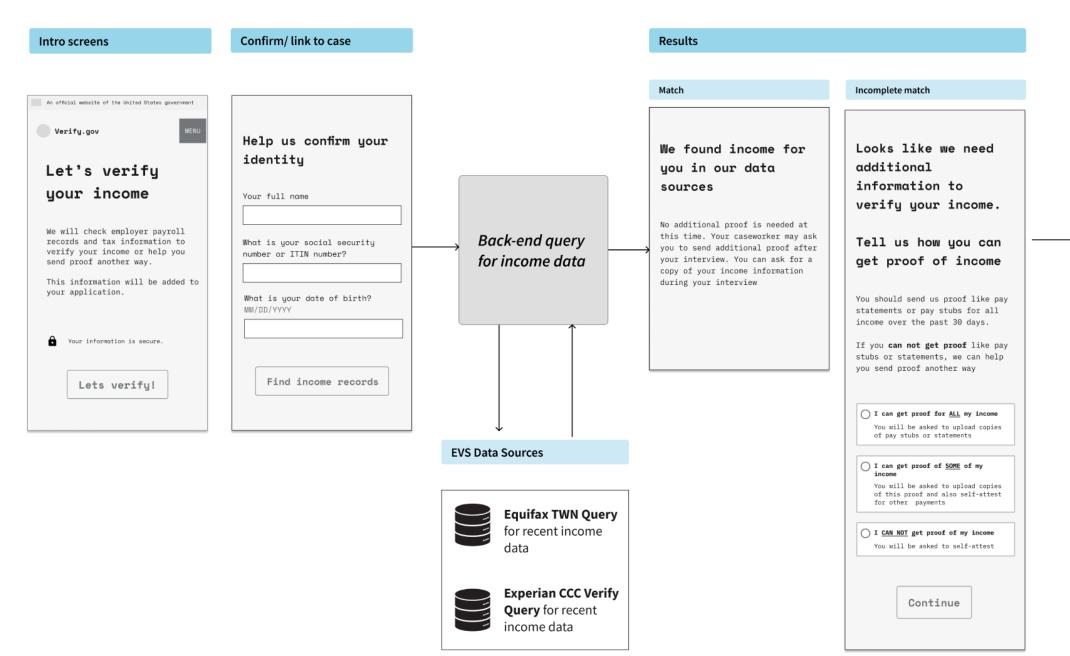
• Expense: protective clothing <u>Delete</u>
- \$40

Total income past 30 days: \$430 Total expenses last 30 days: \$50

Total calculated income: \$380

Confirm and Send

Imagine the tools are packed in an accessible, plain language guided site for applicants.



Package results in a verification report with all supporting documents

DISCUSSION THREE

Tell us what you think

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Thank you!