

Product Validation Summary

Automating Enrollment Proofs

February 2025



Executive Summary



The future of enrollment automation: Smarter, more connected systems

Challenges: Government programs rely on siloed data systems, manual verification processes, and inconsistent eligibility checks. These inefficiencies result in:

- Redundant paperwork for applicants and eligibility workers
- Slow processing times leading to delays
- High administrative costs due to manual eligibility verification
- Data-sharing boundaries between federal, state, and local agencies

To address these issues, we explored:

- ✓ Opportunities for federal intervention in cross-program enrollment automation
- ✓ Types of enrollment linkages and pathways for data-sharing that respect State autonomy
- ✓ Technological solutions that reduce burdens on eligibility staff and applicants

Key opportunities for federal intervention

Pathway	Timeframe	Potential Impact	Tactical Way Forward
<u>State of systems dashboard</u>	Short	A centralized dashboard could streamline modernization efforts, saving potentially <u>years of time and millions in development costs</u> by enabling governments to learn from existing best practices and leverage existing work.	10x exploration to deepen understanding of key user needs and map a path to MVP.
<u>Federated data-matching tools and access frameworks</u>	Medium	Federal data-access standards could reduce inefficiencies and fragmentation, leading to faster, more accurate eligibility determinations. A federated framework could accelerate implementation by <u>2-3 years and save millions in infrastructure and admin costs</u> .	10x exploration to validate viability of a low-integration data matching product offering for TTS
<u>Accelerated automated verifications</u>	Long	Automating verification processes can streamline enrollment, reduce fraud, cut redundant administrative tasks and improve program integrity at scale. Increased federal automated verification solutions could save <u>years and millions in costs</u> .	10x and Login.gov partnership to accelerate data verification work beyond current sources

Research



Research Journey



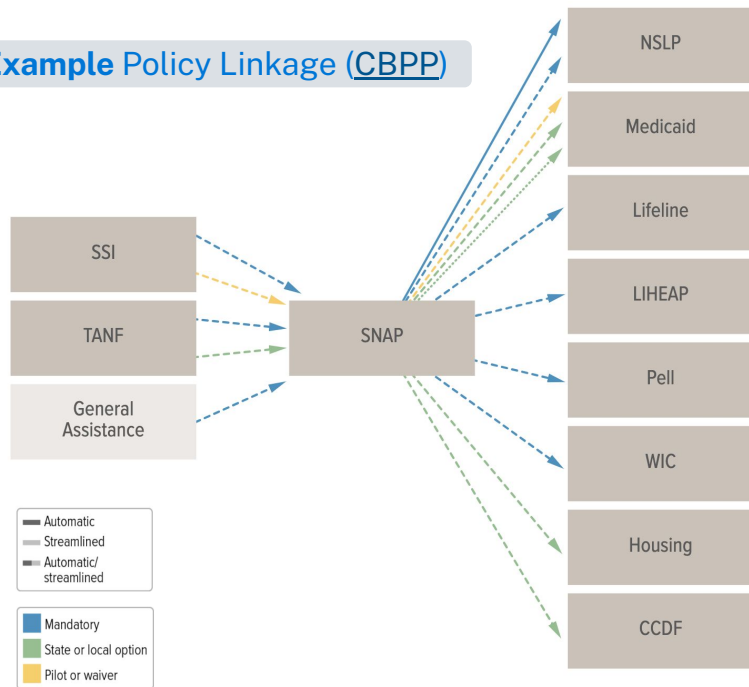
Phase 2 Research Timeline: Nov 2024 – Jan 2025

What We Did

- Conducted 20 research interviews with government agencies, policy experts, and technical stakeholders
- Evaluated existing eligibility verification tools like National Verifier and Medicare's Blue Button 2.0
- Identified key obstacles in federal and state-level data-sharing agreements
- Assessed the feasibility of a federally supported cross-program enrollment solution

Verifying enrollment across public benefits programs is often a manual and time-consuming process

Example Policy Linkage (CBPP)



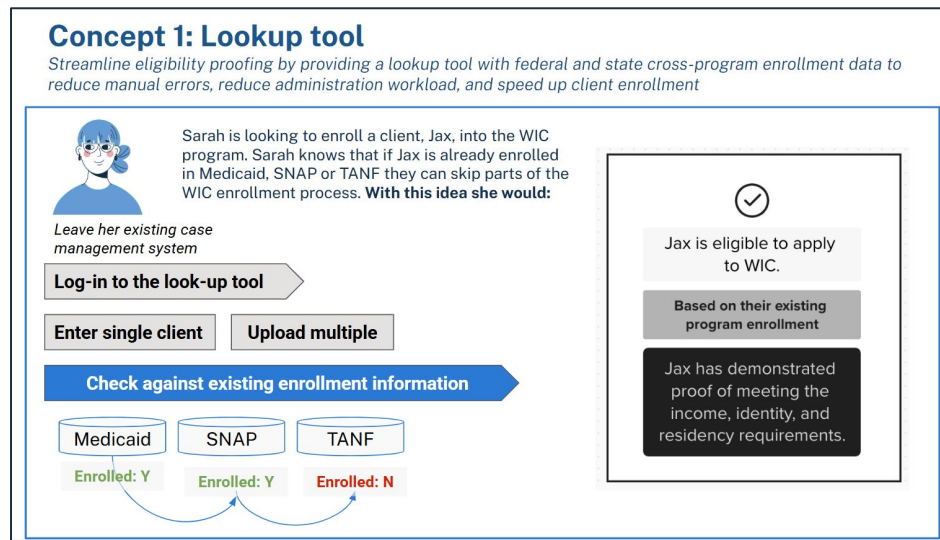
While some benefits programs allow the use of proof-of-enrollment data from other qualifying programs for eligibility, data-sharing challenges often lead to time-consuming, manual verification processes. Eligibility workers often have to:

- **Rely on individuals and families** to provide existing case numbers on applications
- **Contact agencies**, such as by telephone
- **or manually cross-check** spreadsheets and data systems

Product probe: Enrollment lookup tool

We initially hypothesized that a federally managed **cross-program enrollment look-up tool for eligibility workers** would streamline eligibility verification across major federal programs like Medicaid, WIC, SNAP, and NLSP via privacy-preserving data linkages.

The idea was that such a tool could reduce administrative burdens for eligibility workers by automating eligibility verification.



Concept 1: Enrollment Lookup Tool

National Verifier: an existing model and market gap

A grounding reference is the [National Verifier](#), an eligibility look-up tool, currently serving two federal programs. No broader **federal shared solution** exists to support additional government programs -creating a **critical market gap**.

The National Verifier has been recognized for:

- **Reducing manual eligibility checks**, streamlining access for beneficiaries.
- **Lowering administrative costs**, improving operational efficiencies.
- **Reducing waste, fraud, and abuse**, through standardized and automated eligibility determinations.

National Verifier: An Existing Tool for Streamlining Enrollment

Used to by the Lifeline program to expand phone and internet access to vulnerable populations

Online enrollment using eligibility checks

Tell Us Which Program They Are In

To qualify for Lifeline, we need to know which government assistance program the subscriber is in.

Are they in any of these?

Check all that apply.

- ☐ SNAP (Supplemental Nutrition Assistance Program) or Food Stamps
- ☒ Medicaid
- ☐ Supplemental Security Income (SSI)
- ☐ Federal Public Housing Assistance
- ☐ Veterans Pension and Survivors Benefit Programs
- ☐ Tribal Specific Program
- ☐ They don't participate in one of these programs, and want to qualify through income
- ☐ They are not in any of these programs, but their child or dependent is

They Qualify for Lifeline

You can enroll essie brown in the Lifeline Program

Next Steps

Use this information to enroll the subscriber in LIFELINE.

Full legal name: **essie brown**

Address: **1235 Peace Rd W,
Southaven, MS 38671**

Applicant ID: **CBN-933-53375**

Head of household (HOC) (USC #): **1-877-824-4329**

[Return to New Account](#) [Qualify Another Person](#) [Go to \\$0.40](#)

Database sources and verification methods differ by state

State	Qualifying Programs with Automated Data Sources	Manual Verification Additional Information Required to Enroll
Alabama	Medicaid, FPHA, and Veterans Pension	SNAP, SSI, Tribal programs, income
Alaska	Medicaid, FPHA, and Veterans Pension	SNAP, SSI, Tribal programs, income
American Samoa	FPHA and Veterans Pension	SNAP, Medicaid, SSI, Tribal programs, income
Arizona	SNAP, Tribal Food, Medicaid, FPHA, and Veterans Pension	SSI, other Tribal programs, income
Arkansas	Medicaid, FPHA, and Veterans Pension	SNAP, SSI, Tribal programs, income
California	SNAP, Medicaid, FPHA, and Veterans Pension	SSI, Tribal programs, income
Connecticut	SNAP, Medicaid, FPHA, and Veterans Pension	SSI, Tribal programs, income
Delaware	Medicaid, FPHA, and Veterans Pension	SNAP, SSI, Tribal programs, income
District of Columbia	Medicaid, FPHA, and Veterans Pension	SNAP, SSI, Tribal programs, income

Step 1: Select eligibility criteria for streamlined enrollment

Step 2: See whether you qualify and enroll in Lifeline.

National Verifier: An Existing Tool for Streamlining Enrollment

What we learned: key insights and pivot

Challenges for a broad federal eligibility solution

- Most large programs already have Integrated Eligibility & Enrollment (IE&E) systems that consolidate state-level data, reducing the need for a federal lookup tool.
- SLTT*-to-federal data-sharing agreements are non-desirable because they are difficult to establish and scale.
- While there is interest in a federal solution, some doubt states would share eligibility data with the federal government.

Strategic Pivot: Focus on smaller programs**

- Smaller programs lack robust data-sharing infrastructure, making them strong candidates for automation.
- Many are linked directly to federally administered programs like SSI and Medicare and can use existing federal data sources without requiring SLTT to send data up to the federal level.

*State, local, tribal, and territorial governments

** Smaller programs we looked at included: Transit subsidies, LIHEAP, CCDF. For more see [Slide 24](#).

Transit subsidies: research findings summary

The research examined inefficiencies in transit benefit verification and explored opportunities for automation to reduce administrative burdens, streamline eligibility processes, and prevent misuse.

Key Findings

- Manual verification — such as visual checks and paper documentation — continue to be barriers for transit agencies and beneficiaries.
- Manual verification is resource-intensive and prone to misuse.
- Data-sharing inconsistencies hinder automation.
- Existing models focused on user-driven data sharing show promise
- Growing agency interest in automation.

*“Federal transit and CA-DOT had a conversation with Login.gov [in Fall 2024] because agencies are **required to offer 50% discounts but don’t have tools to do it**. Login.gov is part of the solution. Eligibility is the missing link. [...] Mobility is a nice place to start because you’re talking about **getting people to work**, and it’s a small benefit [from a government perspective].”*

-Managing Director, Mobility, Rebel Group

LIHEAP: research findings summary

The Low Income Home Energy Assistance Program (LIHEAP) provides financial support to households struggling with energy costs, but eligibility verification remains manual, inconsistent, and administratively burdensome across states. Wide variations in state processes lead to inefficiencies, delays in benefit distribution, and barriers for eligible households.

Key Findings

- Inconsistent eligibility verification
- Burden of data-sharing agreements
- Cost and security concerns with third-party providers (e.g., Equifax, Experian)
- Demand for a federal eligibility lookup tool

Opportunities for Federal Action

- Federally supported data-sharing frameworks (e.g., IRS, SSA)
- Secure digital verification tools
- Legal & technical assistance for states

“If there can be a federal tool, that would be just brilliant, and we would definitely want to tap into that,”

- Director, Division of Energy Assistance (DEA) at ACF

Other ACF programs: research findings summary

The Administration for Children and Families (ACF) oversees various assistance programs, including childcare subsidies and early childhood development programs. These programs face similar challenges as LIHEAP, with fragmented eligibility verification processes that create administrative burdens and delays for beneficiaries.

Key Findings

- Lack of unified eligibility verification
- Strong support for a federal solution
- Adjunctive eligibility opportunity
- Existing data matching efforts show potential

Opportunities for Federal Action

- Cross-program eligibility verification frameworks
- Automated adjunctive eligibility matching
- Scalable, flexible data solutions

At least 10 states are using commercial tools like 3SI (dataladder.com) to facilitate data matching and eligibility verification.

Its website states that one program “obtained a 24% higher match rate using dataladder versus our standard vendor.

Cross-program insights: flexible & scalable solutions

KEY TAKEAWAYS



Eligibility verification is inconsistent, manual, and inefficient.



Data-sharing agreements are complex, requiring flexible and scalable frameworks for effective automation.



Programs vary significantly across jurisdictions, making a one-size-fits-all solution impractical.



Opt-in models leveraging federal data (e.g., SSA, IRS, Medicare) could provide scalable solutions.

IMPACTS

Creates administrative cost/burden and causes delays and errors in benefits distribution.

Programs want federal leadership but not a mandated system.

Requires adaptable solutions tailored to each program's structure.

Overcomes data-sharing challenges and improves efficiency in transit, LIHEAP, and ACF programs

Pathways



Key opportunities for federal intervention

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Pathway 1: State of SLTT* systems dashboard

Problems/Opportunity

- There is a **large cost** to being on a modernization journey for the first time.
- Administrators are often blocked by the **ambiguity** that comes with naivating automation technologies
- A **consolidated, landscape view** of state agencies' journeys towards modernization could reduce the cost of “reinventing the wheel”
- Non-governmental organizations have started this effort, and there is opportunity for **federal advancement**

“Documenting who is working on what, so states know. Even just a repository to share templates, steps, code, that are recreated with public dollars, it would save state leaders ‘years’ of time.”

– *Federal Administrator*

**State, local, tribal, and territorial governments*

Solution: State of SLTT* systems dashboard

Hypothesis: A dashboard that scrapes public data to tell the story of how different governments are approaching modernization and automation will increase information sharing pathways and reduce redundancy by allowing governments to share templates, codebases, and best practices.

Potential data sources:

- Data from federal award management systems (e.g. SAM.gov, FAC.gov)
- Data from state project updates and federal agency waiver requests (e.g USDA's [SNAP State waiver database](#))
- Data from sources like Code for America, Beeck, Johns Hopkins etc.

Tactical way forward

Scope a time-bound exploration develop a path towards a “state of systems” MVP by surfacing the key user needs and starting data sources.

Explore partnership with organizations already tracking best practices via the Beeck's Digital Benefits Leadership Council.

Pathway 2: Federal tools for data matching and access

Problems and opportunity

- **Data matching technologies** are an underexplored area for federal intervention
- Without a secure, standardized way to **share data**, efforts to match individuals across programs are inconsistent and inefficient.
- Agencies have different **data matching capabilities and toolsets**, leading to fragmentation.
- Data sharing often requires **deep, bespoke legal consultation** before technical interventions are possible.

"If there was a federal tech option we could point States to, that would be great. We are always worried about remaining impartial and trying to ensure we are not directing states to one vendor over another."

–Non-government organization supporting government data matching

Solutions: Federal tools for data matching and access

Data matching products

Hypothesis: Developing data-matching algorithms for agencies without robust systems can provide episodic value to using agencies while providing incentive for standardization across gov't.

Technical assistance for shared data access

Hypothesis: A federal initiative that provides technical assistance, standardized legal agreements and community of practice models to share knowledge and build capacity could lower the barrier of starting to automate data matching for the first time.

Tactical way forward

Scope a time-bound effort to assess if a low-integration data matching product could be a viable solution, by:

- Conducting deeper research into how state agencies handle data-sharing and matching across benefit programs
- Investigating technical standards for data-matching algorithms, including open-source solutions that could be used

Pathway 3: Accelerate automated verifications

Problems and Opportunity

- Government **already has a lot of the information** we request from clients which could be better leveraged across government via automated verification processes.
- **Private sector verification services** are available, but costly and not widely adopted
- **Client-centered sharing models** and privacy preserving data linkages are best practice to protect people's information and can lower legal barriers to data sharing
- **GSA is positioned to play a large role** in “negotiating data sharing” with large federal agencies, like SSA and IRS

“NIST standards are likely moving to mandated “trusted referees” or people who are authorized to make risk-based decisions when someone doesn't have the required proof for ID. This will cause Login.gov to need to add additional secondary sources that proof identity.”

– Login.gov Designer

Solution: Accelerate automated verifications

Hypothesis: Login.gov is already playing a pivotal role in streamlining identity verification for government programs with a model centered around individual user consent.

There is opportunity for Login.gov to expand its automated verification work beyond identity sources, with help from the Accelerators portfolio. For example, Login.gov is already:

- Being used by DOL to do identity verification for unemployment insurance in a number of states.
- Being used by transit agencies in Florida and California to streamline eligibility verification.

Tactical way forward: Accelerators x Login.gov partnership

Scope a partnership with Login.gov to help them accelerate their proofing options beyond current capabilities. Two starting points:

- Help expand their digital proofing authentication to include SNAP and SSA cards
- Pilot a credential-sharing API between Transit benefits and Medicare, explore applicability of LIHEAP

Appendix



Benefit programs with enrollment policy linkages

If someone is enrolled in...	The are at least partially eligible for...
SSI	SNAP, Medicaid, Low Income Subsidy (LIS, via Medicaid), Pell grant, LIHEAP, Lifeline
SNAP	National School Lunch Programs (NSLP), WIC, Medicaid, Pell, Child Care Development Fund (CCDF), HUD Housing programs, LIHEAP, Lifeline
Medicaid	NSLP, WIC, MSP, LIS Pell grants, CCDF, Housing, Lifeline
TANF	SNAP, NSLP, WIC, Medicaid, Pell, CCDF, Housing, LIHEAP

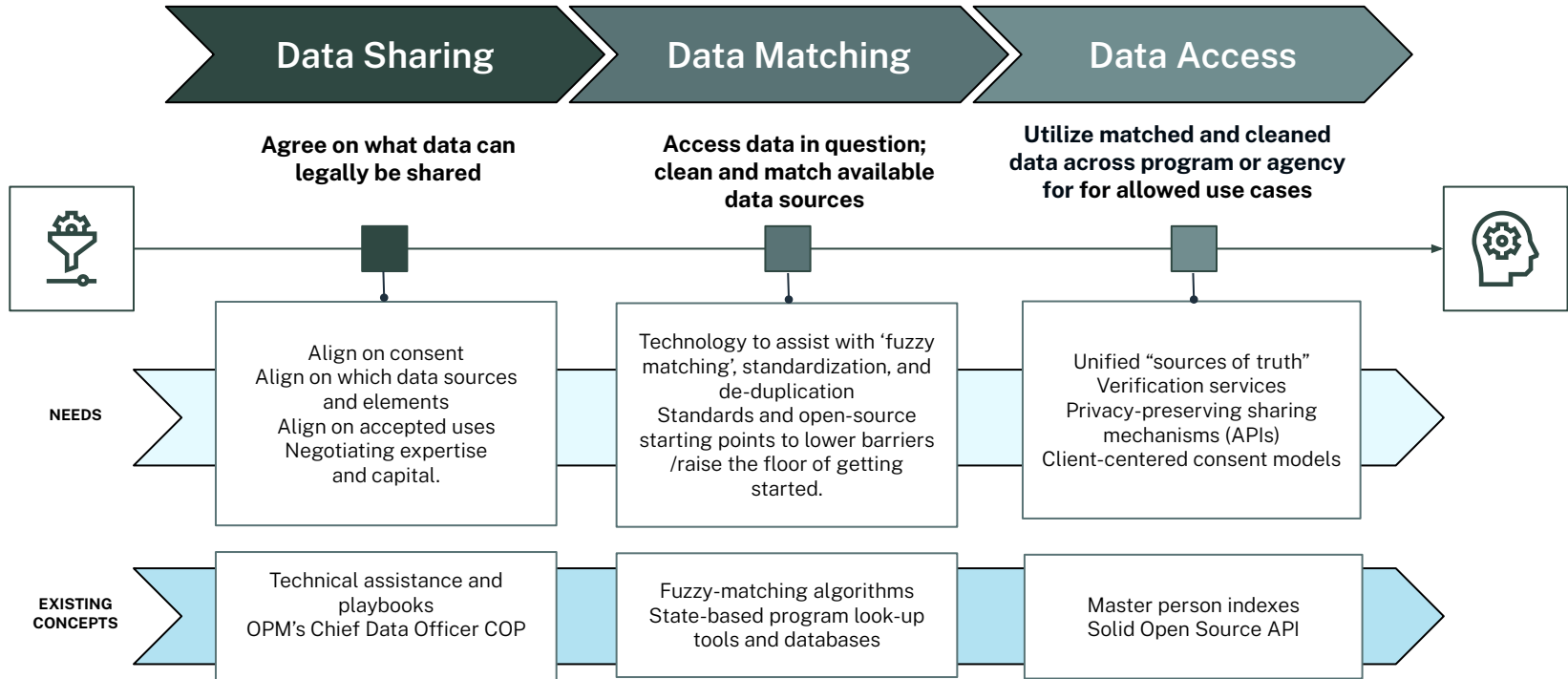
TO \ FROM		Food Assistance			Health				Income Supports						Housing and Utilities			
		SNAP	NSLP	WIC	Medicaid	Medicare	MSP	LIS	TANF	SSI	UI	ETC	CTC	Pell	CCDF	Housing	LIHEAP	Lifeline
Food Assistance	SNAP		●	●	●									●	●	●	●	●
	NSLP				●									●				
	WIC													●				
Health	Medicaid		●	●			●	●						●	●	●		●
	Medicare																	
	MSP							●										
	LIS						●											
orts	TANF	●	●	●	●									●	●	●	●	
	SSI	●			●			●						●			●	●
	UI																	

Source: [CBPP](#)

Frequently requested client-identifying data

Category	Identity	Existing Status	Income
Question	Who are you (to the government)? Who is in your household?	Are you eligible based on who you are to the government? Are you eligible based on an existing program enrollment?	For means-tested programs, are your financial circumstances in line with the policy?
Answer(s) (data fields)	Identity: Name, Age, DOB, Address, SSN Status: Disability, Veteran, Marriage, Death, etc.	Yes/No	Total income = earned or given income + assets - living expenses
Authentication	Valid form of identification (Drivers license / State ID, passport, SSN) verified against various databases. (A key function of Login.gov)	Often a “visual check” of status-proving documentation (e.g. SNAP card, marriage certificate)	Validated against sources direct from employers and/or third-party databases (often via service called The Work Number)

Data automation: a high-level agency journey



The cost of individual SLTT modernization

States are each spending hundreds of millions of dollars building similar systems to one another. **A centralized dashboard could give states visibility into related efforts, saving potentially years of time and millions in development costs by enabling states to learn from each other and leverage each other's work.**

System / Project	Timeline	Cost Estimate	Details	Citations
Oklahoma	Initiated 2011; ongoing	Not specified; project has achieved \$112 million spending reduction and \$260 million cost avoidance	Statewide IT consolidation	https://businessofgovernment.org/sites/default/files/A%20Roadmap%20for%20IT%20Modernization%20in%20Government.pdf
Washington State IE&E Modernization	2021-2016	Exceeds \$100 million	Washington is modernizing its Integrated Eligibility and Enrollment system to simplify access to healthcare and social services programs, aiming for full implementation by 2026.	https://wahealthplanfinder.org/content/dam/wahbe-assets/legislation/WA%20IEE%20Modernization%20Roadmap%20Report.pdf
California - Enterprise data to revenue project 2	Multi-year	\$135 million	Aimed to improve data handling and increase revenue through better system integration.	The 2023-24 Budget: Overview of Information Technology Project Proposals

The cost of de-siloing data

While most state-level integrated data systems (IDS) operate with annual budgets ranging between \$250,000 and \$5,000,000 ([Source](#)), below represents more significant modernization efforts. **A federally coordinated approach could accelerate interoperability efforts, avoiding years of individual state-level legal negotiations and custom system builds.**

System / Project	Timeline	Cost Estimate	Details	Citations
California Data Exchange Framework (DxF)	2022-2026	\$50 million+	Statewide data-sharing initiative to facilitate interoperability between health and human services agencies.	https://www.cdii.ca.gov/committees-and-advisory-groups/data-exchange-framework/
Washington Integrated Client Databases	Launched in 1990s, expanded over time	\$25 million in database integrations	Links over 30 state health and human service agency data systems for program evaluation.	https://nashp.org/data-sharing-resources-for-health-and-housing-partnerships
Colorado Integrated Data System (CIDS)	Launched in 2020; ongoing	\$10 million over 5 years	Designed to integrate data across health, education, and social services to improve policy decisions.	https://oehi.colorado.gov/sites/oehi/files/documents/Data%20Integration%20Strategy%20Condensed%20%28Oct%202018%29.pdf

The cost of automating verification

The following examples illustrate how state and national initiatives are leveraging automated verification systems to enhance service delivery, streamline eligibility determinations, and reduce administrative burdens.

A federally-owned approach could accelerate these development efforts, avoiding years of individual state-level legal negotiations and custom system builds.

System / Project	Timeline	Cost Estimate	Details	Citations
CAL-ITP / Medicare Blue Button 2.0	Implemented in 2023 (full timeline unknown)	Unknown	The California Integrated Travel Project (Cal-ITP) developed a web application enabling digital eligibility verification and enrollment for transit benefits using riders' existing contactless debit and credit cards. This system leverages the Medicare Blue Button API to verify Medicare enrollment status.	Interviews with experts
National Verifier	2018-2019 (phased rollout)	\$344 million over 5 years	Nationwide rollout for Lifeline and ACP programs; aimed at streamlining eligibility	https://www.gao.gov/products/gao-21-235 Microsoft Word - 157907