# Administrative checkpoints, burdens and human-centered design:

Increasing interview access to raise SNAP participation

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<sup>&</sup>lt;sup>1</sup>Joint work with Pamela Herd (Michigan), Sebastian Jilke (Georgetown), Donald Moynihan (Michigan), and Kerry Rodden (Code for America).

## Plan

- Burdens and administrative checkpoints
- The argument in brief
- Human-centered design

# Policy Implementation is Unique

#### **IMPLEMENTATION**

Jeffrey L. Pressman & Aaron Wildavsky



How Great Expectations in Washington Are Dashed in Oakland; Or, Why It's Amazing that Federal Programs Work at All, This Being a Saga of the Economic Development Administration as Told by Two Sympathetic Observers Who Seek to Build Morals on a Foundation of Ruined Hopes

- Policy implementation is distinct from policy design.
- Policies do not end when bills become laws (Pressman and Wildavsky, 1973).

# Policy Implementation is Hard



- ► Take-up problem: Eligible people are not guaranteed to benefit from safety net programs (e.g., Medicaid, SNAP, WIC, etc).
- ► To do so, they must overcome administrative burdens (or barriers) (Herd and Moynihan, 2018).

# SNAP Participation Rates by State, All Eligible People (FY 2018)

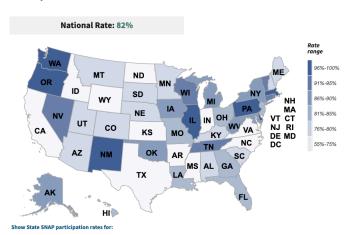


Figure 1: SNAP participation rates by state (all eligible people) Source: USDA FNS (2018). Note: 41M Americans benefit from SNAP.

▶ Some burdens are more consequential than others.

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- Administrative checkpoints: mandatory requirements that must be satisfied in order to progress in an administrative process (Heinrich, 2016; Peeters and Widlak, 2018; Sackett and Lareau, 2023).



Figure 2: Airport security checkpoint

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  - Psychological cost (stressful): People followed all the rules, but still did not receive benefits (= procedural denials)
  - More importantly, checkpoints reproduce inequality (big negative effects for lowest income (Homonoff and Somerville, 2021)



#### Denied because of "missed" interview

I recently applied for food stamps. I live in the north Georgia area for reference. I was told that I would have an overthe-phone interview and they'd call the number they had on file (my current number) on March 19. So I waited around for the phone call to come at 3:30, the time I was assigned, but no one ever called. The following day, I received a text informing me that I had missed my interview, please call this number to reschedule, etc (even though no one ever called). I sat on the phone for a solid 6-8 minutes and was never given an option to reschedule nor was I able to talk to a real person. I tried calling again to see if maybe I had missed an option, but nope. I also went online but couldn't find help there. Today in the mail I received a letter saying I had officially been denied because of 1. a missed interview and 2. failure to reschedule. As you can imagine this is pretty frustrating because I did everything I was asked and now I'm not able to re-apply for some time. Can someone tell me if I did something wrong or if there's anything else I can do? Was I supposed to reach out? Am I just screwed?

# Figure 3: SNAP applicant's missed interview experience. Source: SNAP applicants forum at Reddit

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- 4 Results
- Discussions

 Premise: Administrative checkpoints generate administrative burdens.

 $<sup>^2</sup>$ Code for America, Georgetown's Better Government Lab, and Colorado State and Boulder County Governments.

<sup>&</sup>lt;sup>3</sup>Boulder started flexible SNAP interview in December 2022. The sample is limited to those who applied to the SNAP program via PEAK (Program Eligibility and Application Kit), Colorado's integrated safety net program website that includes SNAP and other services

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- Research question: if these checkpoints are flexible and informative / visible, applicants may find it easier to learn and comply with the procedures and get safety net benefits.
- We<sup>2</sup> tested this hypothesis using a **field** experiment and a **follow-up survey** based on SNAP applicants (N = 1,554) in Boulder, Colorado (March 22-2023).<sup>3</sup>

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Kim (Johns Hopkins) Administrative Checkpoints July 29, 2024

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- Key findings
  - ► Control: traditional mailer reminder ► Mailer content

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- ► Control: traditional mailer reminder ► Mailer content
- Treatment: traditional mailer reminder + three text reminders ("call any time" "at your convenience") 4

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- Benefit approval impact: 6-7pp
- Post-experiment survey shows that the text reduced learning costs about the interview requirement.

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- ► Human-centered design in policy (e.g., Biden Administration's 2023 Executive Order on Federal Customer Experience): a set of techniques to understand administrative processes from the user perspective (Norman, 2023; Herd, Moynihan and Widman, 2023; Sullivan and Soka, 2022; General Services Administration and The Lab at OPM, n.d.)

▶ Before the field experiment (March-May 2023), Code for America researchers made **two** field trips (urban and rural counties) to the state in July and September of 2022. Qualitative research

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- Identified the key pain points (administrative checkpoints are a subcategory of pain points): policy communication (causing confusion and lack of confidence)
- ► Co-designed solutions for improving communication between the county and benefit applicants

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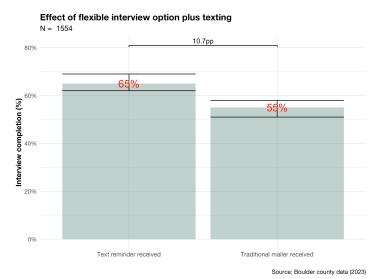


Figure 4: Effect of flexible interview option plus texting on compliance.

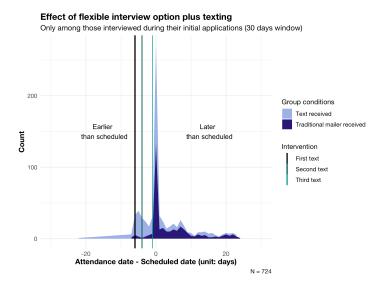


Figure 5: Effect of flexible interview option plus texting on timing (scheduling)

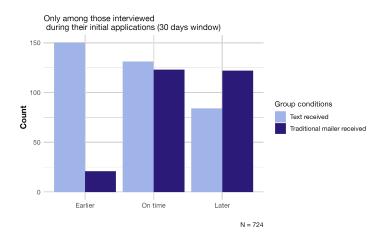


Figure 6: The distribution of SNAP applicants' interview timing

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► Treated group was more likely to say they (a) knew the interview was required by 9 pp and (b) they knew what to do during the interview by 11 pp.

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- ► Fact: on average, most nudges are not so effective (DellaVigna and Linos, 2022).
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- ➤ Yet: some nudges are effective due to these contexts and design choices (Giannella et al., 2024; Chohlas-Wood et al., 2023; Lopoo et al., 2020)

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- Some contexts are general, and others are not.
  - Policy implementation challenges are common.
  - Policy adoption capacity is not uniformly distributed:
    - Boulder initiated the flexible interview and adopted the texting approach.
    - Nonetheless, Boulder is not a representative case (more resourceful and motivated than other places).
    - ► Texting is cheap, but research investment (human-centered design and rigorous evaluation) is not cheap.

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- Methodological/empirical: Integrating quantitative and qualitative insights by listening first, co-designing research, and building evidence
- Normative: Strengthening capacity and improving practice can solve real problems and generate positive social impacts (accountability and responsiveness)

## Thank you

Comments or questions? E-mail: jkim638@jhu.edu

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## Plan



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## County mailer content

Dear We have received your application or recertification for assistance. An interview is required for (program) You have been scheduled for a phone interview at (time) on (date). Please call (303) 441-1660 at this time. Please contact our office at (303) 441-1000 if you like a face-to-face interview instead of a phone interview. If you miss your appointment or need to reschedule, you must contact us at (303) 441-1660 to reschedule your interview. If you do not complete a required interview for your application or recertification, your benefits will be denied

### Text reminders

In the text below, Code for America and Boulder couldn't mention SNAP specifically, but instead used PEAK, a broader term, to comply with the FCC guideline on telephone consumer protection (TCP), particularly in the context of human and health services.

# Initial text (sent 24 hours after initial application)

Boulder County:Hi First Name we've processed your PEAK application!

Please call 303-441-1660 in the next week to complete a phone interview. The interview should take about 30 minutes and you'll learn if you qualify for benefits.

Our hours: 8:30am-3pm, Mon-Fri

Learn more about the process here:

http://www.boco.org/SNAP-FAQ

# First reminder (sent 3 days after initial application)

Boulder County: Hi First Name reminder that you have the option to complete your interview at your own convenience by calling 303-441-1660 any time between 8:30am-3pm, Mon-Fri.

Learn more about the process here:

www.boco.org/SNAP-FAQ

## Second reminder (24 hours before scheduled interview)

Hi First Name , your PEAK phone interview is tomorrow. This should take about 30 minutes. Call us at 303-441-1660 during your scheduled time to complete your interview.

Can't make it? Just call anytime Monday through Friday between 8:30am-3pm to conduct an unscheduled interview.

Learn more about the process here:

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## Impact on Benefit Approvals

	Approved	Approved (procedural denials imputed)	Approved during initial applications (procedural denials imputed)
(Intercept)	0.3399***	0.3355***	0.2121***
, ,	[0.3057, 0.3741]	[0.3016, 0.3694]	[0.1819, 0.2423]
	p = 0.0000	p = 0.0000	ho = 0.0000
Treatment status	0.0631*	0.0643**	0.0691**
	[0.0145, 0.1116]	[0.0160, 0.1125]	[0.0262, 0.1121]
	p = 0.0110	p = 0.0091	p = 0.0016
Num.Obs.	1517	1533	1539
R2	0.004	0.004	0.006
R2 Adj.	0.004	0.004	0.006
AIC	2097.3	2112.4	1771.8
BIC	2113.3	2128.4	1787.8
Log.Lik.	-1045.647	-1053.200	-882.891
RMSE	0.48	0.48	0.43
Std.Errors	HC2	HC2	HC2

# Interview Impact on Benefits Among Compliers

	Approved	Approved (procedural denials imputed)	Approved during initial applications (procedural denials imputed)
(Intercept)	0.0016	0.0016	-0.1533
. ,	[-0.2542, 0.2574]	[-0.2443, 0.2474]	[-0.4143, 0.1077]
	p = 0.9899	p = 0.9899	p = 0.2495
Interview status	0.6146**	0.6147**	0.6693**
	[0.1892, 1.0400]	[0.2014, 1.0279]	[0.2322, 1.1065]
	p = 0.0047	p = 0.0036	p = 0.0027
Num.Obs.	1517	1533	1536
R2	0.197	0.202	-0.066
R2 Adj.	0.197	0.201	-0.067

## Impact on Learning Costs

	Know interview	Interview easy (4-point)	Interview easy (binary)	Learning cost index
(Intercept)	0.5171***	0.4116***	0.4087***	0.4362***
,	[0.4528, 0.5814]	[0.3540, 0.4692]	[0.3180, 0.4994]	[0.3699, 0.5026]
	p = 0.0000	p = 0.0000	p = 0.0000	p = 0.0000
Treatment status	0.0931*	0.1096*	0.1277 +	0.1335**
	[0.0034, 0.1828]	[0.0220, 0.1972]	[-0.0031, 0.2584]	[0.0370, 0.2299]
	p = 0.0420	p = 0.0144	p = 0.0556	p = 0.0069
Num.Obs.	470	225	225	225
R2	0.009	0.027	0.016	0.032

### Heterogeneous treatment effects

- ▶ The estimand is ITT since we only know who received the texts, not who read them.
- ▶ To estimate heterogeneous treatment effects, we also estimated the ITT conditional on applicants' language preference, gender, homeless status, and household size.
- ATEs do not reliably vary by language, gender, and homeless status.
- ▶ ATEs vary by household size. Applicants with a larger household who received the treatment show up for the interview at a lower rate than their counterparts (Finkelstein and Notowidigdo, 2019).