

Administrative Burden

Bethany Pray
Legal Director
bpray@cclponline.org

Allison Neswood

Deputy Director of Strategic Priorities

aneswood@cclponline.org

789 Sherman St., Suite 300 Denver, CO 80203

303-573-5669

www.cclponline.org



Administrative burden

Learning costs

- Learning about the program
- Ascertaining eligibility status and the nature of benefits, conditions that must be satisfied
- Learning how to gain access

Compliance costs

- Providing information, documentation to show eligibility
- Financial costs to access services (fees, travel costs)
- Avoiding or responding to discretionary demands made by administrators

Psychological costs

- Stigma of participation in program
- Loss of autonomy from intrusive administrative supervision
- Frustration at dealing with learning and compliance
- Stress of uncertainty about compliance



Administrative burden: purpose vs. impact

- Theories behind the imposition of high administrative hurdles
 - Program integrity (i.e. reduction of fraud is a priority)
 - Encouraging desired behaviors (i.e. work)
 - Allocation of scarce resources to the needlest individuals

What the theories fail to consider

- Cost of administrative burden for both the system and beneficiaries
- Burdens are most easily managed by those with the greatest privilege and access to more resources
- Efforts to reduce fraud may deter or exclude eligible people
- Political motives to advance or restrict existing policy
- Bias based on race and ethnicity, sex, gender
- Inadvertent burdens that result from inadequate planning



Reinforcing harmful attitudes

- People who are in need: "The government is not for me. It does not recognize my humanity."
- Program administrators/larger society: "People in need are trying to cheat and deserve to be surveilled if they ask for assistance."

 Larger society: "Government and governmet programs are not functional or efficient."



Example 1: Voter registration

State steps to decrease burden

Same day registration

Mail-in voting

Early and extended voting

Auto-enrollment using administrative data

State steps to increase burden

Requiring proof of citizenship to register

Reduced hours

Purging voter rolls

Discouraging third party registration

Prohibitions on those with criminal

justice involvement



Example 2: ACA

Steps that decrease burdens

Steps that increase burden

Simplified eligibility process and criteria

Reduced paperwork and electronic verification

Removal of asset tests

Extensive outreach, information and assistance

Standardized plans (EHB)

Work requirements

Opting against expansion (12 states), having inconsistent FPL limits (CO)

Requiring paperwork instead of relying on electronic verification

Defunding outreach and assistance, requiring licensure



Example 3: SNAP

Steps that decrease burdens

Access to online screening tools, community support, in-person assistance

Streamlined multi-program applications

Phone interviews

Removal of asset tests

Longer recert periods (2002 Farm Bill)

Use of EBT cards, welcome signs at grocery stores, broad selection

Steps that increase burden

De-linking food assistance and cash assistance (PRWORA, 1996)

Nonalignment with other programs

In-person interviews only

Extensive documentation requirements

Work requirements with limited exceptions

Drug testing (proposed WI, GA)

Stigma of using food stamps, bans on "unhealthy" foods



Considerations

What are some of the administrative burdens - learning, compliance and psychological - involved in accessing coverage through Medicaid, CHP+ and Connect for Health?

What could alleviate those burdens?

How can HCPF and C4 separately and in partnership with consumer groups and community members, alleviate burdens?