



Colorado Center on Law and Policy

Standing with Diverse Communities Against Poverty

Administrative Burden

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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 neediest 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

- Applicants: “The government is not for me. It does not seek my participation or recognize my humanity.”
- Program administrators/larger society: “People are trying to cheat and deserve to be surveilled if they ask to participate or request assistance.”
- Larger society: “Government and government 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

Ample polling sites

State steps to increase burden

ID at the polls

Reduced hours and locations

Purging voter rolls

Requiring proof of citizenship to register

Discouraging third party registration

Prohibitions on those with criminal justice involvement

Example 2: ACA

Steps that decrease burdens

Simplified eligibility process and criteria

Reduced paperwork and electronic verification

Extensive outreach, information and assistance

Easy comparability of plans

Enrollment tools

Steps that increase burden

Shortening OE

Requiring paperwork instead of relying on electronic verification for enrollment and SEPs

Dual billing for certain plans

Defunding outreach and assistance, requiring licensure, fees

Example 3: Medicaid

Steps that decrease burdens

Reduced paperwork and
electronic verification

Ex parte renewals

Removal of asset tests

Extensive outreach,
information and assistance

12-month coverage

Steps that increase burden

Work requirements

Requiring paperwork instead of relying
on electronic verification

Inconsistent FPL limits, by category

Lack of in-person assistance

Confusing communications

Increased scrutiny on immigration
status

Example 4: 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?