

## Administrative Burden

Pamela Herd Georgetown University



### How do we want people to view and experience government?

• Simple

• Accessible

• Respectful





# What are Administrative Burdens?

### **Defining the concept**

- People's experience of government as onerous
  - Learning Costs
  - Compliance Costs
  - Psychological costs

### **Learning Costs**

 Challenges that people face finding out about a program, determining whether they are eligible for it and what benefits they might receive, and understanding how to apply for, retain, and redeem benefits

### **Missouri's Medicaid Churn**

### Missouri Medicaid Enrollment For Parents and Kids Has Dropped Dramatically

Total MoHealthNet & CHIP Enrollment: Children & Parents, January 2018 - June 2019

January 2018 719,352 July 2018 693,861 Annual MoHealthNet Reviews resume July 2019 592,959

Source: DSS Caseload Counter

### Top Renewal Barriers Faced by Missouri MoHealthNet Families as Reported by Health Care Providers



Source: Medicaid Enrollment Survey, Kids Win Missouri, Missouri Budget Project and the Missouri Coalition of Children's Agencies

### **Compliance Costs**

 The costs of following administrative rules and requirements, such as providing extensive personal information and documentation, time needed to complete processes, and more Figure 3

### Of people who have been disenrolled or had their coverage renewed, 23% were terminated for procedural reasons, as of February 13, 2024

Of All Completed Renewals, the Share of Enrollees Terminated for Procedural Reasons, Determined Ineligible, and Whose Coverage Was Renewed



Medicaid Coverage Renewed vs. **Terminated for Procedural** Reasons vs. Determined Inelligible

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### **Psychological Costs**

- Stigma
- Loss of autonomy
- Stress and frustration
- Uncertainty



### **Psychological Costs**

"If you have ever had to deal with the bureaucracy of poverty, of having to prove over and over again to those in charge how fundamentally unworthy you are, you understand that forms are not sacred...There are government agencies that use their forms to try to help you. And there are those that seem to have designed their forms to remind you of the audacity of expecting your government to help you with anything." – Kaitlyn Greenridge





## Why Focus on Burdens?

### Why burdens matter?

- Seemingly small burdens have big effects
- Burdens have distributive effects and reinforce inequality
- Burdens often opaque to policymakers and obscured from media who do not utilize programs directly



### Impacts of administrative burdens

- Experiences of burdens shape our views of government
- Negative interactions reduce trust in government and may cause people to avoid or exit programs while positive interactions increase confidence
- Burdens can be so large that reducing them can have just as large an effect as expanding program eligibility

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### **Administrative burden Catch-22**

- Burdens exist across all policy areas
- Programs to address poverty often include largest burdens
- People perform less well under conditions of scarcity, stress, poor health
- Lower-income people face most burdens, with least resources to address them, multiplying effects

#### RESEARCH ARTICLE

Health in citizen-state interactions: How physical and mental health problems shape experiences of administrative burden and reduce take-up

Pamela Herd<sup>3</sup>

Elizabeth Bell<sup>1</sup> | Julian Christensen<sup>2</sup>

| Donald Moynihan<sup>3</sup>

<sup>1</sup>Askew School of Public Administration and Policy, Florida State University, Tallahassee, Florida, USA

<sup>2</sup>VIVE – The Danish Center for Social Science Research, Åbyhøj, Denmark
<sup>3</sup>McCourt School of Public Policy, Georgetown University, Washinaton, DC, USA

Correspondence

Julian Christensen, VIVE – The Danish Center for Social Science, Søren Frichs Vej 36 G, 8230 Åbyhøj, Denmark. Email: juch@vive.dk

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#### Abstract

Public services represent a key means by which societies seek to reduce inequalities. However, some people may experience administrative procedures as more burdensome than others, creating inequality within programs intended to be equity-enhancing. Prior work has found human capital (e.g., education and conditions like scarcity) to affect burden and take-up. We build on this by examining the role of health in the form of attention disorders, pain, anxiety, and depression in the context of tax reporting in Denmark and college financial aid in Oklahoma, USA. Across cases, attention disorders and pain are associated with more burden some experiences and in the financial aid case, they are associated with reduced take-up as well. Individuals suffering from multiple health problems have the most negative experiences and lowest take-up. The results suggest that extra support may be needed for people suffering from health problems in order to reduce inequities in experiences and outcomes.





### Where do burdens come from?



- Federalism
- Policymaking by other means burdens emerge in policy design, and continue through implementation
- Bureaucracies are not inclined to detect/minimize –

inertia, limited capacity, conflicting incentives





# The federal government wants to reduce burdens



### Institutionalizing in government

- Biden Administration is addressing admin burden
- Urging States to identify admin burdens and reduce them to achieve greater equity
- Executive Orders to improve customer experience and service delivery

### **Recommended approaches**

- Strategies to reduce burden and improve equity include:
- Reducing complexity and improving comprehensibility
- Minimizing costly documentation requirements
- Streamlining processes and strengthening
  - communication



# **Specific Programs**



### **Key Burdens with SNAP**

- Recertification and churn
- Interviews
- Providing documentation
- Getting ahold of a caseworker
- Waiting and communicating
- Actually using the benefit



### **Key Burdens with Tax Credits**

- Tax benefits compared to public assistance have lower admin burdens, but burdens still exist, with at least 20% of those eligible not receiving benefits
- Key challenges include learning costs (concealed within tax system) and compliance costs (reaching non-filers and more)
- Has made tax agencies, their capacities, constraints, and preferences, very important for the safety net



### **Key Burdens with Housing Assistance**

- Key barrier is often simply not knowing that housing assistance is available
- Navigating administrative processes to apply for vouchers can be challenging
- Key issues include limited number of vouchers, extensive wait lists, actually finding an apartment, and being able to use voucher



# Takeaways and Lessons

### **Takeaways and Lessons**

- Burdens should be imposed only when benefit exceeds costs and government should bear brunt of burden
- Should not be used for "back door" goals, like limiting recipients
- Solutions are possible and can reduce admin costs, increase participation, and improve outcomes of program goals – should be policy focus
- Acknowledge customer experience and identify root cause of burden (statutory, regulatory, budgetary, process-based?)

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# How to Reduce Burdens



### How to Make Programs More Accessible

- Nudges are not enough
- Draw on existing administrative data
- Auto enrollment
- Simplify the design
- More outreach



### Conclusion

- Questions?
- Thank you



Opportunity Area to Improve Equity	Known Burden Drivers	Potential Solutions
Reducing form complexity and improving comprehensibility	<ul> <li>Lengthy forms and instructions driven by legal design requirements.</li> <li>Questions that cannot be answered based purely on an applicant's own memory or knowledge about themselves.</li> <li>Multiple or supplemental forms during a single application experience.</li> <li>Eligibility requirements that are overly complex and not well known.</li> </ul>	<ul> <li>Ensure that all instructions and notices are written in plain language and translated into multiple languages.</li> <li>Adopt principles of human-centered design (e.g., early and routine user interviews and A/B testing to continually refine design and language).</li> <li>Provide step-by-step examples of process involved in claiming benefts, accessing protections, or navigating a service.</li> </ul>

<b>Opportunity Area to Improve Equity</b>	Known Burden Drivers	Potential Solutions
Reducing form complexity and improving comprehensibility	<ul> <li>Questions that ask for information substantially similar to information the applicant has likely provided to the agency previously, or to another agency previously.</li> </ul>	<ul> <li>Conduct pipeline analyses to identify drop-off points of various channels (Web, phone, paper/in-person) and submission processes.</li> <li>Provide navigators or field staff who can support the applicant across the experience of applying for the program</li> <li>Systematically and routinely use screeners or data-matching to notify individuals of benefits they are likely entitled to</li> <li>Provide calculators to estimate benefits</li> <li>Develop program defaults to opt beneficiaries into automatic enrollment</li> <li>Systematically and routinely use data-matching to prefill applications or administratively verify information for prospective beneficiaries.</li> <li>Leverage categorical eligibility to enable minimally burdensome enrollment for individuals who have already demonstrated eligibility for other benefits programs with similar requirements</li> </ul>

<b>Opportunity Area to Improve Equity</b>	Known Burden Drivers	Potential Solutions
Minimizing costly (in terms of both time and money) documentation requirements	<ul> <li>Requirements for third-party documentation.</li> <li>Questions requiring responses from, or coordination with, third parties</li> <li>Questions that cannot reasonably be answered while relying only on documents readily accessible in the respondent's home.</li> <li>Documentation requirements involving fees or other financial impositions to access.</li> </ul>	<ul> <li>Allow for respondent self- attestation or self-allegation in areas that currently require evidence or documentation</li> <li>Shift the burden involved in developing evidence or external documentation necessary to prove eligibility from the applicant to agency personnel.</li> <li>Allow for streamlined enrollment coupled with post-enrollment verification of eligibility.</li> </ul>

<b>Opportunity Area to Improve Equity</b>	Known Burden Drivers	Potential Solutions
Minimizing costly (in terms of both time and money) documentation requirements	<ul> <li>Identity proofing requirements that are challenging to meet for certain communities.</li> <li>Processes known to involve a meaningful subset of applicants seeking support from third- parties, such as advocacy organizations or legal counsel.</li> </ul>	<ul> <li>Provide navigators who can support the applicant across the experience of applying for the program, to include support with developing necessary identity proofing</li> </ul>

<b>Opportunity Area to Improve Equity</b>	Known Burden Drivers	Potential Solutions
Streamlining processes	<ul> <li>Processes requiring travel as an element of applying for this program</li> <li>Processes where applicants need to take off work or locate childcare to complete transaction requirements.</li> <li>Programs where the applicant may need immediate access to benefits or may be navigating a moment of crisis.</li> <li>Processes that involve the applicant transacting with or moving between multiple offices or agencies (either Federal, State, or local).</li> </ul>	<ul> <li>Shift in-person interview requirements to telephone or video- teleconference.</li> <li>Ensure at least two equally accessible means of applying for the program (one of which should be a mobile- responsive web-based application).</li> <li>Ensure consistent wait times (and call- back option for greater than 5- minute wait times on the phone) for applicants when they call the agency or visit in-person.</li> <li>Provide live agents who are available to support applicants outside of normal business hours.</li> </ul>

<b>Opportunity Area to Improve Equity</b>	Known Burden Drivers	Potential Solutions
Streamlining processes	<ul> <li>Substantial differences or inconsistencies in how different States or localities administer the program</li> <li>Idiosyncratic submission requirements, such as requiring ink-based signatures or original records when copies would suffice</li> <li>Frequent recertification.</li> </ul>	<ul> <li>Allow for retroactive enrollment or point-of-need enrollment (e.g., health care enrollment at the hospital).</li> <li>Structure business processes so that applicants can receive channel-neutral support regardless of the office with which they conduct transactions.</li> <li>For State or locally administered or adjudicated programs, develop consistent minimum standards for questions and processes.</li> <li>Eliminate ink signature requirements where not required by statute and allow for copies (digital or physical) of documentation absent a demonstrated adjudicative need for original records.</li> </ul>

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<b>Opportunity Area to Improve Equity</b>	Known Burden Drivers	Potential Solutions
Improving communication	<ul> <li>Lengthy notices or notices that are written in languages that target audiences do not use or understand.</li> <li>Sending only a single notice before taking action.</li> <li>Sending notices exclusively by mail</li> </ul>	<ul> <li>Ensure notices are written in plain language and are designed with human-centered design best practices (such as prioritizing key information in headings, text boxes, and bold text; avoiding over-including information not relevant to the immediate task at hand).</li> <li>Deliver communications through a trusted source, and utilize outreach campaigns and partnerships with trusted community organizations.</li> <li>Develop improved communication strategies, to include systematically and automatically tracking and following up with unresponsive applicants or beneficiaries.</li> <li>Proactively work to maintain accurate contact information for program participants</li> </ul>

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by mail for the second	Systematically and routinely send communications and notices via multiple modalities (e.g., mail, email, text messages, ohone calls). Allow applicants the ability to select preferred modes of communication Provide timely reminders considering season, day of week, timing of day that is most relevant for the target audience Conduct specialized, proactive outreach to individuals who may be unlikely to respond to ypical notices, such as individuals who do not speak English as their native language, individuals with vulnerable housing situations, or individuals with certain cognitive impairments.

<ul> <li>Improving communication</li> <li>Lengthy notices or notices that are written in languages that target audiences do not use or understand.</li> <li>Sending only a single notice before taking action.</li> <li>Sending notices exclusively by mail</li> <li>Tailor notices to specific needs of different customer segments, provide personalized information, and offer individualized feedback and peer comparisons when relevant.</li> <li>Ensure beneficiaries have on-demand, self- service access to their account, including applications or other records that may be relevant to future interactions with the agency</li> </ul>	<b>Opportunity Area to Improve Equity</b>	Known Burden Drivers	Potential Solutions
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