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***** FRIDAY, MARCH 11, 2011 AT 10:00 A.M. *****

Statement of Sundhar G. Sekhar
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Before

The U.S. House Ways and Means
Subcommittee on Human Resources
Hearing on

The Use of Data Matching to Improve Customer Service, Program Integrity, and Taxpayer
Savings

March 11, 2011

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Chairman Davis, and members of the Committee:

I appreciate the opportunity to provide testimony to the Subcommittee on Human Resources of the Committee of Ways and Means on a subject in which I have been deeply involved for most of my professional career. As the Health and Human Services Practice Lead for Deloitte Consulting LLP, I have had the opportunity to provide information technology and business process services to a number of state agencies in providing. My experience also includes extensive interactions with peers who work in private sector industries such as healthcare, banking, consumer business and retail, all of which support business to business (B2B) and consumer to business (C2B) exchanges that are aimed at improving customer satisfaction and reducing administrative costs.

In the State and Federal Government, human services encompass a wide array of programs including Temporary Assistance for Needy Families (TANF), Child Support Enforcement, Child Welfare, Unemployment Insurance, Child Care and more. Each of these programs has distinct benefit application, validation and eligibility requirements. The Child Support program administers collections, while the other programs are concerned with providing benefits. However, there is a great deal of commonality across these programs. Much of this similarity lies in the benefit application information that is captured, the need to validate client information and the overlap of existing state and federal data sources to house consumer information. Improving timely and accurate access to data exchanges could help state and federal agencies validate the benefit application information more accurately which improves overall customer service, promotes program integrity and reduces the amount of tax payer dollars spent on managing these programs.

Historically, challenges to enhancing human services data exchanges have included the following:

- Technical limitations caused by aging IT infrastructures
- Policy inconsistencies across the human services programs
- Data latency
- Lack of consistent data exchange standards
- Difficulties in uniquely identifying clients due to client data privacy controls across the systems.

The evolution of technology and new consumer interaction patterns driven by the internet and social media in the private sector have redefined the paradigm for other parts of our industry and of the economy, where similar data exchange hurdles have been addressed. Real-time electronic data interchanges (EDIs) are standard for business to business (B2B) interactions in commercial industries like banking, retail, healthcare, and transportation as well as consumer sectors that provide comparable functions to

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those delivered by the human services programs that are under the purview of this committee.

Within human services, the child support program uses data exchanges to effectively access publicly available information, and intercept exchange results to implement workflows and automatic system actions that collect child support payments. The leading states in child support program administration use these B2B data exchanges to improve program integrity and overall program performance.

The private sector has taken advantage of its B2B capabilities using real-time data exchanges to fuel consumer to business (C2B) interactions and decision making via the internet, thereby improving the overall customer experience. More efficient data exchange methods have also made it possible to collect richer content that is used to reduce risk, minimize fraud and enhance case worker productivity. These private sector solutions provide workers with reliable consumer information and automated processes allowing workers focus on providing customer service and managing the integrity of the programs they provide. With the abundance of “data” available, having access to the right “information” at the right time is one of the strongest influencers to improve customer service, while promoting program integrity.

The following table outlines the key points I will make in my testimony:

Topic	Key Points
Current Data Exchange Environment	<ul style="list-style-type: none"> • Manual Data Collection and validation plays a key role • A high touch customer service model focusing both on norm and exceptions • Data sources, and validation methods are inconsistent, and duplicated across human service systems
Prevalent Private Sector practices and models	<ul style="list-style-type: none"> • Uniform data exchange standards, and reciprocity • Single source of data exchange validation • Real time exchanges • C2B data exchanges and interactions via web • Standardizing B2B data exchanges
Applying Private Sector Practices to Benefit Programs	<ul style="list-style-type: none"> • Streamlined Benefit Application process • Use of Data Exchanges to focus on Application exceptions • Proactive tracking of client events • Applying security and privacy practices
Future Considerations for Human Services Data Exchanges	<ul style="list-style-type: none"> • Collaborative Network for Human services for data exchanges • Standards for real time data exchanges in human services environment • Minimizing Manual Data Collection and Validation • Event Driven Case Management and predictive capabilities

In the remaining pages, I describe these points further.

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Current Human Services Data Exchange Environment

Data collection plays a primary function in the delivery of today's human services programs. Many of the state human services agency workers are focused on capturing and manually entering benefit application information. With better infrastructure, their time could be redirected to interacting with customers who may need help in reaching their program goals. In today's human services business model, the majority of transactions between citizens and state governments are in person, over the phone or on paper. Even relatively simple transactions are managed using these "high touch" interaction methods.

A "high touch" business model is expensive for the service provider (State/Federal Government) and is often inconvenient for the consumer (citizen). It is also common for human services clients to be asked to provide similar benefit application information when they access multiple human services programs. This further compounds the challenges by increasing the total workload for both clients and respective human services case workers. It also increases the likelihood of capturing inconsistent client information across the human services programs.

In human services delivery, a case worker provides a list of verifications required to receive a defined benefit (e.g. TANF). This list is often referred to as the "verification or proof checklist." Even clients who apply online via the internet are required to supply the "proof" defined by the verification checklists. They provide proof primarily using hard copy paper input. Capturing paper verifications, routing copies through the defined workflow, keying in the pertinent data and scanning or manually filing the documentation is cumbersome and expensive. This system relies on the aforementioned manual steps when validating income, assets and other similar data points that impact program eligibility. The reliance on self verification and manual validation could create issues regarding the timeliness and reliability of the information required for eligibility determination.

Human services agencies typically use numerous electronic interfaces with only limited sets of electronic data exchange sources for verification of tremendous quantities of information collected manually about a person. Data validations across human services programs are typically duplicated within each of the human services IT systems. Each of these systems require access to the source exchange data using point-to-point interfaces designed for the specific needs of an individual program or service.

Many of today's interfaces are run as batch events scheduled to be processed at predefined times. The timing of these interfaces may not allow for real-time interactions facilitated via the internet. These interfaces also may not include an individual identifier that can be used to accurately associate individuals across systems. Many of these exchanges pull information from multiple source systems as a "back-end" process, resulting in data latency and acting on data exchange matches. In addition, when the

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information is received from these exchanges, there may be inconsistencies across the human services programs on how that data exchange match is applied within the workflow and rules processes. The child support program may automatically apply the exchange information to take action, while another human services program may alert a worker and create a manual work step for follow up. The model currently used to electronically integrate systems could also contribute to redundant IT infrastructures and disparate processes that require maintenance of multiple interface formats and standards across the different state and federal systems.

The following figure ***Current Human Services Data Exchange Model*** illustrates this model today across human services programs within a state:

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Current Human Services Data Exchange Model

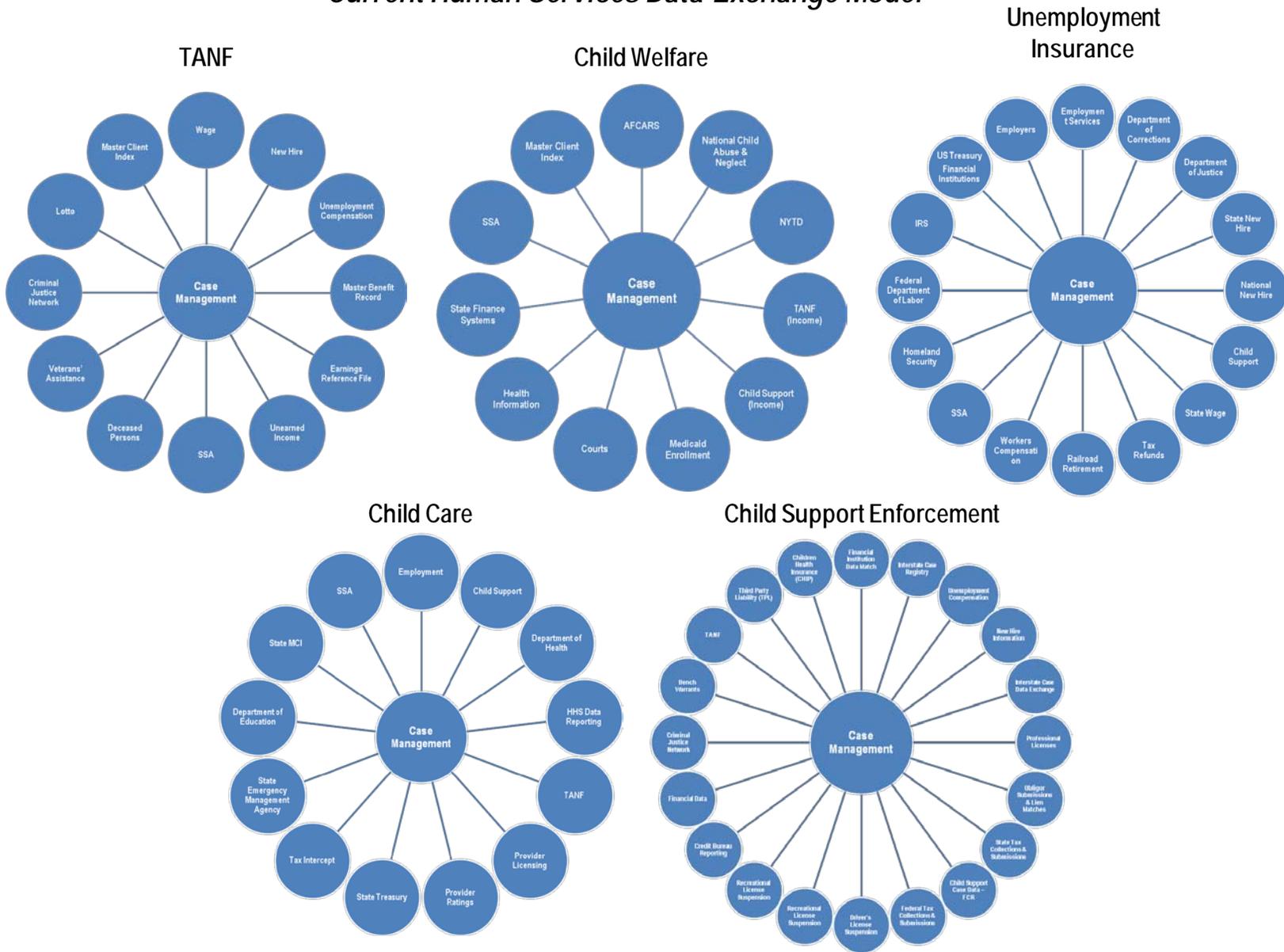


Figure 1. Current Human Services Data Exchange Model.

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As a result of the reliance on paper based processes and existing exchange limitations, the effort spent on data entry, data review, physical document verifications and manual actions continues to represent a substantial portion of state and federal HHS administrative spending. A significant amount of time is spent in manually collecting, entering and validating information in the respective IT systems. The accuracy of this manually intensive process directly impacts whether the authorization of services is correct and has potential impacts on program integrity. The efficiency of this process is also a key determinant of program timeliness and customer service.

Prevalent Private Sector Models in B2B Data Exchanges

Uniform Data Exchange Standards and Reciprocity

In the private sector, relevant reciprocal data exchanges within and across organizations have been a primary contributor to improved efficiencies. For example, the American National Standards Institute (ANSI) chartered the Accredited Standards Committee (ASC) X12N to develop uniform standards for electronic data interfaces (EDI) to manage business transactions. The X12N subcommittees include:

- Finance
- Transportation
- Insurance
- Supply chain
- Communications & Control
- Government

Although many X12N standards have been developed for government transactions, including abandoned property, business entity filing, election campaign and lobbyist reporting and other functions, standards for human services programs need further exploration.

The financial industry is an example of a private sector market that has capitalized on the usage of electronic data exchanges. Manual steps involved in processing applications for credit and loans are typically a small percentage of the overall process, allowing for faster processing times for loan applications at a lower cost to the bank. By developing and utilizing common standards across banks, obstacles for information sharing have been minimized. Consistency and standardization has enabled third party information aggregators such as credit reporting agencies to share data systematically, which helps banks to validate and augment information provided by applicants.

The data collected on a loan application and the need to verify that content before providing services has many parallels to the processing of an application for human services and the associated eligibility determination events. For example, the Unified Residential Loan Application is a five page form that collects demographic data, services requested (loan type, amount and terms), employment information, income, expenses, assets and liabilities and acknowledgements. By utilizing common standards, this

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information is shared and validated using a common EDI within and across service providers.

Using credit reports as a specific example, XML based standards have been developed for credit reporting agencies to provide data in real-time to banks using a common format that systems can easily use. The MISMO standard provided by the Mortgage Banker's Association of America's Mortgage Industry Standards Maintenance Organization is an example of one such standard. The XML mortgage specification covers loan origination, real estate services, secondary marketing, and servicing. Another XML standard, HR-XML is used for employment screening and human resources. The HR-XML standard includes 35 different data categories and provides over 350 data element tags. The schema includes demographic data, prior addresses, employment information, aliases, creditors, public records (liens, bankruptcy filings, and judgments), balance amounts, credit scores and many other dimensions. Use of standards such as the HR-XML simplifies implementation of automated solutions for processing loan applications.

Single Source of Data Exchange Validation

The use of standards also supports automated consolidation of data from multiple sources, and automation of decision making based on that data. For example, it possible for Internet and back office systems to integrate credit report data from any or all of the three national credit bureaus: Equifax, Experian, and Trans Union. Subsequently, back office systems can apply the Bank's business rules and scoring algorithms to verify the consumer's identity and their employment, income sources, liabilities and credit history to make decisions such as credit line approvals. This model is comparable to the determination of eligibility based on the unique requirements of different human service programs using multiple data inputs for verifications. Similar to human services eligibility verifications, the scores provided by credit bureaus require the collection and processing of massive quantities of data. There are more than 1,000 local and regional credit bureaus around the country that gather information about our credit habits directly from creditors using EDI. Credit reporting agencies also access information about you from public records, including the courts. The MISMO and HR-XML standards both use XML to manage the data with metadata tags that enable disparate systems to consume EDI content selecting the data elements they require for processing.

Real-Time Exchanges

By managing exchanges in real-time, banks utilize technologies to drive workflow efficiencies. For example, applications are routed to processors based on their credit authority. Based on pre-defined parameters, the system identifies exceptions and triggers tasks for staff when exceptions are encountered. Technology enablers such as business rules engines, data quality, standardization and data cleansing engines, neural network based scoring models, and event-driven workflows drive significant process efficiencies and administrative cost savings. Financial institutions also use these types of

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tools to collaborate with one another and pool their data to derive better insights into fraud, and consumer credit risk.

C2B Data Exchanges and Interactions via Web

The advancement of Web Services and EDI infrastructure in the back office has converged with the shift towards consumer to business (C2B) interactions via the Web. With the plumbing in place, banks are able to accept, validate and process transactions via the Web, often in real-time without human intervention. Without the underlying infrastructure provided via Web Services and EDI, the C2B relationship would not be viable. This changing dynamic in the interaction between consumers and businesses is sweeping across the private sector landscape and is also starting to gain traction in the public sector. However, progress in human service programs is limited by the EDI “plumbing” available to support real-time interaction with citizens.

Standardizing B2B data exchanges

The usage of X12N and National Council for Prescription Drug Programs (NCPDP) standards in the healthcare industry to manage business to business (B2B) transactions between health care payers, including Medicare and Medicaid, and providers is another illustration of the potential to drive efficiency using data exchanges.

The healthcare EDI networks utilize exchange brokers that serve as intermediaries to facilitate X12N transaction processing across providers and payers. A provider submits requests (prior authorization, eligibility, claims payment, etc.) through the intermediary. The intermediary maintains the EDI network and routes the requests to each of the appropriate payers. A similar practice is utilized for third party liability (TPL) insurance validation using the X12N standards. Companies specializing in identification of third party insurance act as brokers to access enrollment information from multiple payers in order to provide consolidated results on an individual’s current insurance coverage.

Although data is not physically stored or processed by the intermediary, the complexity of managing transactions is considerably lower than if each payer and provider developed their own point to point solutions. More efficient B2B integration in the healthcare industry also laid the foundation to aggregate complex data content providing more sophisticated and useful measures of outcome, quality and cost of healthcare. By extending this model to human services, a data exchange intermediary focused on human services data exchanges could serve a similar function. Different human services systems would send standardized requests for common data elements to the data exchange intermediary which would then send back matched data from any number of trusted source systems in real-time.

Applying Private Sector Practices to Benefit Programs

Streamlined Benefit Application Process

Following the data exchange models used by the private sector, one can imagine a future where a citizen could apply for benefit programs online the same way we currently apply online for loans or credit cards. Citizens could key in data inputs that are augmented and validated in real-time using data exchanges. Although internet usage is not an option for all human services clients, over 75% of households have internet access based on the US Census Bureau. The percentage of adults over 65 using the internet has increased from 15% in 2000 to 42% in 2009 nationally. For citizens who are unable to apply online, a “short form” could capture essential information, or they could use a service center to apply online through a kiosk using the same abbreviated data collection and online validation process. In all these interaction channels, the human services systems interact with data exchanges in real-time and automatically retrieve relevant information about the client based on commercially and publicly available information. The client is able to validate the trusted content and provide additional updates when more current information exists. Redundant collection of verifications and the associated paper intensive processes would be minimized.

Using Data Exchanges to Focus on Application Exceptions

By extending government-to-government (G2G) data exchanges, simple transactions such as income or identity validation would no longer require “high touch” services. As these validations are exercised automatically online through a consumer portal (much like an online site to shop and apply for loans), the clients can transact with the government and reduce workload impact on the case worker. Case workers spend less time on mundane tasks as they only validate and review the exception cases which may require further attention. The rest of the benefit applications and other similar events rely on the electronic data exchanges as the primary means for validation and event management.

Most states currently have one or more online screening and enrollment systems for human services programs that could be extended to provide these services. However, the government’s ability to offer citizen-to-government (C2G) interactions via the internet is currently limited due to the reliance on physical proof (i.e. copies of W2s, tax statements, social security cards, drivers’ licenses, insurance cards, birth certificates, etc.). Following private sector concepts that use data exchanges to automatically collect and validate data in real-time could accelerate the transition to C2G service delivery via the internet enabling government to capitalize on the internet revolution fueled by the usage of social media and C2B online service offerings. It may also be feasible for the Government to capitalize on existing private sector models. For example, over 100 data elements from the current credit reporting standard mirror data collected for human services application processing and could be considered as a source to collect or validate application inputs.

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Proactive Tracking of Client Events

Imagine a future where changes in client circumstances become event triggers that are proactively pushed to human services systems instead of today's processes that pull data at enrollment, redetermination periods and when a change is reported manually by a client. The event based results could then be automatically processed by rules based workflows within the human services system that administer these programs. Similar to the private sector, states would also be able to use predictive modeling to anticipate client actions based on these events and proactively intervene to address potential issues with child support payments, compliance with TANF work participation requirements, etc. This is similar to how credit card companies or financial institutions predict potential default or bankruptcy and take proactive steps to mitigate these risks. The clients benefit from proactive customer service and the states gain from increased program integrity and compliance with program requirements.

Applying Security and Privacy Practices

Security, privacy and sensitivity to client information are clearly concerns with any data exchange. Appropriate security and privacy access controls are essential and should be based on four core tenets:

- (1) Only information necessary for the proper administration of government programs and benefits should be collected and exchanged
- (2) Information that is collected is being voluntarily provided by the citizen (as a condition of receiving a benefit or service)
- (3) Only the specific data elements that are required for a given program are shared and verified by that program
- (4) The data sources and exchanges are secure

It is feasible to reduce the time and cost to collect and verify required data, while at the same time improving security and privacy. Validating an individual's information using an electronic interface may be less of a risk than requiring physical proof. Managing physical proof potentially increases the probability of identity theft or other improper usage because multiple physical copies of an individual's most private documents are stored in file cabinets across the human services program offices. With electronic interfaces and record keeping, access can be controlled and audited with a higher degree of granularity. The client only provides the information that is required for determining eligibility.

Summary of Private Sector Concepts to Consider

Today's environment provides an opportunity for states and the Federal Government to take advantage of private sector successes for many reasons. These drivers make EDI modernization more viable now for human services than a decade ago. Human services can benefit from these private sector models to deploy EDI solutions that provide reliable, timely and consistent access to data exchanges. The same types of information

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that are needed for human services eligibility determination are also required for nutritional and healthcare programs such as FNS's programs, Medicaid and CHIP. Paralleling the credit reporting illustration, crossover between human services and health and nutrition could provide added value similar to the usage of credit scores by banks and employers across different financial products; promoting consistency across health and human services programs.

In addition to private sector practices, the human services programs can also look to the child support data exchanges within the states as a model and starting point in evolving this concept. The child support program with its primary goal as a financial collection process has incorporated a number of the private sector data exchange concepts as described above in recent years. It was a business imperative to use automated data exchanges and case actions given the steady increase in child support cases.

In summary, the **four potential areas** for the committee to consider for human services that parallel private sector B2B practices include:

1. Collaborative network for data exchanges
2. Standards for real-time data exchanges across disparate systems
3. Minimize manual data collection and validation
4. Event driven case management and predictive capabilities

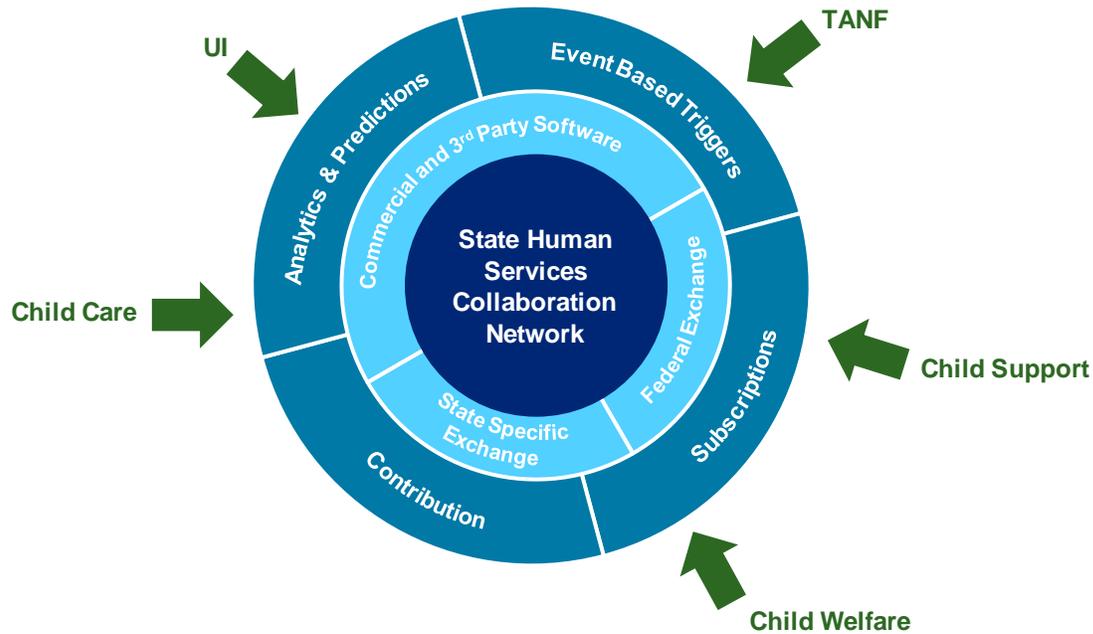
Collaborative Network for Human Services for Data Exchanges

A single data exchange collaboration across the human services programs enables sharing and the consistent use of information across the state's administration of human services programs.

There are multiple models that can be used to efficiently manage collaborative data exchanges. A data brokerage repository similar to the credit reporting bureaus would be one option to provide unified data store(s) for relevant human services information. Using this model, the data exchanges are simplified because the expense of data collection and management is consolidated for all human services programs for a state and access to the information is channeled through the data brokerage repository(s) instead of multiple discrete interfaces. Alternatively, a data brokerage exchange that uses an EDI intermediary similar to the healthcare system could shield individual human services system from the complexities of interfacing with multiple source systems.

Both models minimize redundant and complicated connectivity and simplify EDI using a collaborative approach as illustrated in the ***Human Services Data Collaboration*** graphic below:

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Health and Food Assistance programs share commonality with human services and could participate in the collaboration network.

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Figure 2. Human Services Data Collaboration.

Through a common client identifier, the state is able to gain immediate access to data exchange information that is critical to verify and determine an applicant's benefit program eligibility at enrollment, redetermination or ongoing at any point in their interaction with the human services agency. This concept could be further expanded by allowing human services entities to subscribe to data exchanges for their clients and also contribute to the exchange when client information changes within a human services system.

This model could be used to simplify many of the current exchanges from source systems for each human services program listed in the next page figure and could provide the foundation for extended EDIs with more robust capabilities.

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Unemployment Insurance (UI) Program	Temporary Assistance for Needy Families (TANF)	Child Care	Child Welfare	Child Support
Employers	Wage	Employment	AFCARS	Financial Institution Data Match
Employment Services	New Hire	Child Support	National Child Abuse & Neglect	Interstate Case Registry
Department of Corrections	Unemployment Compensation	Department of Health	NYTD	Unemployment Compensation New Hire
Department of Justice	Master Benefit Record	HHS Data Reporting	TANF	Interstate Case Data Exchange
State New Hire	Earnings Reference File	TANF	Child Support	Professional Licenses
National New Hire	Unearned Income	Provider Licensing	Medicaid Enrollment	Obligor Submissions & Lien Matches
Child Support	SSA	Provider Ratings	Courts	State Tax Collections & Submissions
State Wage	Deceased Persons	State Treasury	Health Information	Child Support Case Data – FCR
Tax Refunds	Veterans' Assistance	Tax Intercept	State Finance Systems	Federal Tax Collections & Submissions
Railroad Retirement	Criminal Justice Network	State Emergency Management Agency	SSA	Driver's License Suspension
Workers Compensation	Lotto	Department of Education	Master Client Index	Recreational License Suspension
SSA	Master Client Index	Master Client Index		Credit Bureau Reporting
Homeland Security		SSA		Financial Data
Federal Department of Labor				Criminal Justice Network
IRS				Bench Warrants
US Treasury Financial Institutions				TANF
				Third Party Liability (TPL)

Figure 3. Current Human Service Exchanges.

The human services programs and agencies also have an opportunity to form consortiums with other states to better improve timeliness and access to G2G exchange information across states. For example, the human services programs across states can better share information on work participation clocks, non compliance, duplicate benefit claims and other similar usages.

The difference between the current point-to-point approach and the proposed brokerage concepts is illustrated in the **Current Approach and Collaborative Exchange Comparison** graphic below:

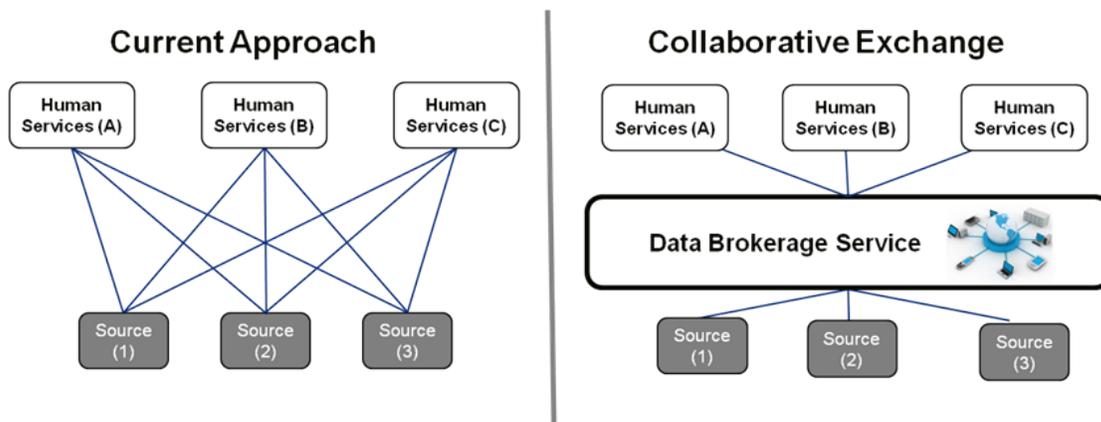


Figure 4. Current Approach and Collaborative Exchange Comparison.

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Standards for Real-Time Data Exchanges in Human Services Systems

A core tenant to consider when sharing data is standardization. The goals of standardization address three core requirements:

- Normalization of events and transaction requirements
- Organized metadata for multiple uses across human services systems
- Access protocols for real-time transaction at the point of service

The human services events illustration below exemplifies some of the event triggers that could be normalized to support shared transaction standards. Many of these events require data that are at the core of human services systems and overlap across human services programs. Standardizing data exchange formats for human services programs could simplify the management of human services events.

Below are data sets which human services systems could consider for common data exchange standards:

- Demographics
- Household Composition
- Residency
- Income
- Assets
- Expenses
- Insurance
- Existing Benefits

The following table provides details of these events that could be considered for common human service data exchange standards.

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<p>Child Care</p> <ul style="list-style-type: none"> •Employment Changes •Change in income (Increase, Decrease) •Immunization information •Date of Birth Changes •Enrolled/Dis-enrolled in other public assistance programs/benefits (TANF, SNAP, GA) •Change in household status (Marriage, Children, Deceased) 	<p>TANF</p> <ul style="list-style-type: none"> •Application for benefits •Information Validation •Individual demographics changes •Change in Job •Change in other Government Services Received •Unemployment Compensation Changes •Child Support Compensation Changes •Change or Awareness of Benefits from other states •Life Events (Marriage, birth, death, adoption, etc.) •Change in household •Criminal Activity Involvement •Change in other income/expenditure •Child Support Payments
<p>Unemployment Insurance</p> <ul style="list-style-type: none"> •Reporting due date arrives •Passage of time – quarter end date arrive •Initial Filing of claim occurs •Change in employment status – loss of work or reduction in work •Change in income (wages for given period, pension, workers compensation, severance/separation pay, back pay, etc.) •Request for information received •Validate employment •Validate employment separation information •Validate able and available status •Validate benefit/income sources and amounts •Validate citizenship and identify or work authorization status •Verify participation in school or approved training programs •Initiate child support payment garnishments 	<p>Child Welfare</p> <ul style="list-style-type: none"> •Substantiation of an Allegation •Death of a child •Provider Allegations •Family Allegations •Child Legal Custody changes (due to court orders and family circumstances) •Placement Entry, Changes and Exit •Changes in Family structure •Permanency Goal Change •Changes in Income •Provider Licensing Status changes (Expiry, Denial, Revoked)
<p>Child Support Enforcement</p> <ul style="list-style-type: none"> •Filing of a complaint for IV-D services •Change in a member’s IV-A benefit status •IV-E and Title XIX referrals •New, updated or unavailability of Employment •Paternity Establishment •Change or lack of address •Initiating or responding to an Interstate request for IV-D services •Establishment of Support Order 	<ul style="list-style-type: none"> •Establishment of Income Attachments •Direct intercept of income •Receipt and distribution of Financial Payments •Financial delinquency leading to enforcement activities •Non-financial Obligations •Death/Incarceration of Non-Custodial Parent •Change in Healthcare coverage •Emancipation of children •Case Closure

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Minimize Manual Data Collection & Validation

Providing access to benefits and services using the internet to complete applications, renewals, review benefit information and client correspondence online could improve customer service and efficiency. Workers are able to focus their limited time on improved interactions with citizens and outcome management to help them gain self sufficiency. They spend their time assisting exception cases that need more time, no different from a banking institution that prioritizes their worker's time towards applications or cases that require additional reviews.

Event Driven Case Management and Predictive Capabilities

In the human services environment, there could be eligibility impacts in benefit programs that can be automatically triggered from data exchanges. These triggers, based on events such as a change in client circumstances (changes in income, address, employer, etc.), could be processed immediately within the human services IT systems. For example, the child support program has incorporated a new hire exchange that automatically uses new hire information and links child support payment business processes based on someone getting a job. Asset verification systems are also being developed across the nation to standardize verification of assets for human services programs and could become another source for data exchanges. Using the information gained from data exchanges could also position a human services agency to perform predictive analytics to determine client actions.

Conclusion

Human services delivery is poised for change and can apply private sector data exchange models in its operations. By improving data exchanges and automatically acting on data exchange matches, case workers can focus on increasing client interaction and customer service. This improves overall efficiency, facilitates consistent application of policy and program rules across human services programs and could save tax payer dollars.

The same concepts also apply to Medicaid, CHIP and FNS nutrition programs where many of the clients overlap with human services programs.

The addition of health insurance exchanges will compound existing complexities, further straining the service delivery model. Using some of the models described above could provide the government with concepts to avoid duplication by creating another new siloed system with health insurance exchanges. It provides a unique opportunity to use human service data exchanges as a central pillar for health and human services delivery.

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Legend of Acronyms

ANSI	American National Standards Institute
ASC	Accredited Standards Committee
B2B	Business to Business
C2B	Consumer to Business
C2G	Citizen-to-Government
EDIs	Electronic Data Interchanges
G2G	Government-to-Government
TANF	Temporary Assistance for Needy Families
NCPDP	National Council for Prescription Drug Programs
TPL	Third Party Liability