

Comments for ACUS: Identifying and Reducing Burdens in Administrative Processes

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Identifying and Reducing Burdens in Administrative Processes

Nava PBC is a consultancy and a public benefit corporation working to positively transform how people interact with government by making government services simple, effective, and accessible for all. Working in partnership with government agencies, we build simple and accessible service experiences, support programs with technology to effectively produce the intended outcomes for the populations they serve, and help agencies build capacity to adapt in a world of continuous change.

Since our start in 2015 with HealthCare.gov, we have successfully delivered public sector solutions to establish and modernize digital services across federal and state agencies. Our work has helped tens of millions of people enroll in critical benefits, it has saved thousands of years of cognitive burden for users, it has supported the disbursement of billions of dollars to new parents, families, and Veterans, it has saved thousands of years of civil servants' time, and it has helped government save or avoid billions of dollars in unnecessary costs. Our experience spans all levels of government, from helping the New York City Department of Education roll out telehealth in New York City schools, to working with the State of Massachusetts to design and implement a new paid family and medical leave program, to working with the Centers for Medicare and Medicaid Services (CMS) to develop human-centered APIs that enable a shift toward value-based Medicare services.

We are pleased to share these comments on identifying and reducing administrative burdens, grounded in our experiences building human-centered public services.

1. Methods and practices agencies can use to identify administrative burdens

Human-Centered Design

At Nava, we practice human-centered design (HCD) to center problem-solving around the people affected by a process, system, or service. We firmly believe that participants are experts on their own needs, which is why we center our approaches on participants when identifying burdens. Methods outlined in the request for comments, such as conducting opened-ended discovery research to understand the needs of program applicants and beneficiaries, testing products and services with impacted users throughout the product development lifecycle, and collecting feedback via anonymous surveys once the product or service is live, are core parts of our process to identify burdensome experiences for constituents. We've seen human-centered design successfully help agencies identify burdens, and we recommend that agencies interested in burden-reduction initiatives adopt them. Based on our experience, there are several best and promising practices we recommend agencies adopt when leveraging human-centered design methods to identify burdens: ensuring any research has a diverse cohort of participants, having staff provide their perspective on burdens, which can be validated through direct user research, supplementing qualitative approaches with quantitative data, mapping the service, and leveraging participant advisory councils for continuous engagement.

Ensure research has a diverse cohort of participants

It's critical that any user research effort—whether it's open-ended 1:1 interviews with a participant to learn about their experience with a service or testing a prototype of a simplified form—has a diverse cohort of participants. While equitable recruitment may take more time, having different perspectives and experiences can help agencies identify burdens that might not be shared across all beneficiaries. We often use Census data as a starting point when coming up

with participant recruitment criteria, but in an effort to ensure everyone has a simple and accessible experience, we prioritize the perspectives of those who are more likely to need support with the service. While the specifics can change depending on the project, we've found that focused outreach to include people with disabilities, people of color, LGBTQ+ people, immigrants, people from both rural and urban locales, and people with proficiency in languages other than English can ensure that research reflects a diversity of experiences. Recruiting diverse participants can also highlight widespread burdens and barriers that exist for specific communities. [We've written a guide](#) with specific advice on how agencies can more equitably recruit for user research.

Ask frontline staff their perspective on burdens

We've also found that front-line staff are a great starting place when looking to identify burdensome processes for the public. These staff see firsthand the effects of compliance and learning costs. In our work, we start by conducting open-ended interviews with agency staff to surface hypotheses they have about the constituent experience, and we then check these hypotheses in our research with the constituents.

Supplement qualitative approaches with quantitative data

We also use quantitative data to understand where constituents might be struggling. For example, analyzing search trends related to a specific program can help identify learning costs. On a recent paid family leave project, we realized that many people were searching for "maternity leave," even though all kinds of parents could qualify for the benefit. To make it easier for prospective applicants to find this information, the agency guide on parental leave now clarifies that this kind of leave is often referred to as "maternity leave". This kind of analysis and change is relatively simple for agencies to do, but it has a tangible impact to make program eligibility clearer to participants.

Simple data analytics tools like [funnels](#) can also help an agency see where people are falling off during an online application, which can inform qualitative research studies to understand what the barrier is. Finally, analyzing administrative data to understand take-up rates overall and disaggregate by demographics is incredibly

impactful when trying to understand where burdens might exist. While we have seen firsthand how difficult it can be to access this data and find accurate comparison data to establish the take-up rates, in our experience, these trends are illuminating to understand barriers to the service, which again can be further unpacked using qualitative research methods.

Map the service

In addition to these methods, service design [approaches where we collaboratively map out a process or service](#) can help agencies identify burdens. In past work, where we were auditing various pieces of a state's IT infrastructure to identify risks to its stability, it was helpful to develop a practice of what we called "business process mapping." This process ensured that the scope of our audit was not just technical in nature, but also included impacts on staff and the public.

For example, risks to a system's stability can also be a human single-point-of-failure, or a burdensome administrative process that is so inflexible, it cannot respond in the event of a catastrophe. Business process mapping helped to visually lay out the current landscape in a digestible way for the entire team. It helped us identify administrative burdens and acted as a value-added deliverable for IT stakeholders who needed to plan for complete modernization. It was extremely valuable for the state to have a clear depiction of their current state needs and landscape in order to make informed plans for modernization.

Similarly, we have worked with agency staff and beneficiaries to map out the journey from the perspective of someone applying for and receiving benefits. In particular, having the beneficiary map out high and low points in their journey is an expeditious way to identify burdens. Like with business process maps, these journey maps of the current state can help articulate where burdens exist, which the team can then use to identify opportunities for burden-reduction.

Leverage Participant Advisory Councils for continuous engagement

Because our methods to identify burdens rely on user research, we wanted to share an engagement approach we recently piloted successfully. We recently

formed a Participant Advisory Council (PAC) made up of 12 Montana WIC participants as part of our initiative to build an online recertification tool to reduce the burden of the six-month/annual recertification process on Montana WIC participants and staff. Our PAC successfully gave Montana WIC consistent access to program participants and allowed us to gain a richer understanding of the barriers WIC participants face.

PAC members attended monthly meetings and participated in several user research studies throughout the product development processes. Because we developed relationships with PAC members over five months, we were able to get a deeper understanding of their experiences and how they navigated the program over time. This kind of continuous engagement with end users helped us identify burdensome aspects of the WIC recertification process as well as using WIC benefits in general. In order to help other teams conduct similar research, we published a detailed [guide](#) on forming a PAC.

Standard Measurement Practices

Establishing some standard measurement practices and indicators for administrative burden can make it easier for teams to identify and track progress towards target service experience outcomes. Nava has had some early success adapting the Georgetown University's Better Government Lab [Administrative Burden Scale](#). The scale, in concert with usability testing, has helped us understand the baseline burden of a service experience during initial discovery research, the burden throughout the technology development process, and the change in burden after implementing the tool.

2. Methods and practices agencies can use to reduce administrative burdens

Methods and practices we've seen successfully reduce burdens

In our experience, we've seen agencies successfully implement the following methods and practices to reduce burden on the public using technology.

Center people, not technology

Just as we put program participants at the center when identifying burdens, they also need to be at the heart when designing solutions that reduce burdens. In practice, this means that government agencies should take a human-centered approach rather than a requirements-driven approach when planning burden-reduction technology projects. In a requirements-driven approach, the goals of the technology are to meet technical requirements, which are often firmly defined at the start of the project and immutable. A human-centered approach involves defining user stories—plain language descriptions of the user needs to be solved—that are informed by user research, prototyping solutions to those stories, validating those prototypes with users, and then using that feedback to iterate further. This approach ensures that initiatives aimed at reducing burdens will have the intended impact, because it allows for flexibility and adaptability in the technology development process to meet user needs, no matter the timeline. For example, in our research with Montana WIC participants and staff to design a recertification portal, we identified that submitting documents to the WIC clinic was a compliance cost that could cause churn. There was an opportunity to reduce that burden through an online document uploader. We conducted multiple rounds of prototype testing with participants to assess if our proposed scope for the recertification portal would make it easier for participants to provide documents. These 30-minute sessions allowed us to test the feature at varying levels of fidelity, from low-resolution wireframes to a higher-fidelity prototype, which helped us identify confusing interactions and content and then validate that

the changes we made in between research cycles were effective. For agencies looking to incorporate practices like usability testing into their burden-reduction initiatives, we've written guides on how to [plan](#) and [conduct](#) this kind of user research.

Use plain language to reduce learning and compliance costs

Using clear, concise, and conversational language can reap enormous rewards when building services for users from diverse backgrounds. Jargon and other complicated terminology are often confusing and can be especially difficult for people to process and respond to when an interaction with a government agency can have serious consequences for a person or their family. People engaging with service applications and other forms may also have to do so while balancing work and family commitments, and are unlikely to have time to learn specialized vocabulary or navigate complex language. Agencies should invest in strong content strategy to reduce burdens, such as [clear onboarding guidance](#) to reduce learning costs. Language, like other elements of a service design, should be tested and validated and revised with feedback from real users, and those users should include members of underserved communities. Additionally, most communities include more than one commonly spoken language, so plain language guidance should include translation and testing of content in multiple languages. These practices not only make a service more inclusive, they can help people navigate a benefits process more quickly and reduce the time support teams spend answering questions.

Simplify form design

A large number of interactions with government services involve filling out forms, but overly time-consuming or confusing forms can prevent eligible users from successfully applying for or receiving services. Many agencies focus on reducing administrative burdens by simplifying and digitizing forms. Forms should be as simple and easy to fill out as possible. All forms should be designed mobile-first and tested on a variety of mobile devices. Prepare and guide people through a complex process with upfront instructions that make it clear what materials a user will need to complete a form and what they can expect after it's been submitted.

Well-designed online forms accommodate only one question per screen, reducing cognitive load and making it easier for users to focus on their responses. Forms should also save a user's state, so they can start a process but continue it later if needed. Validation should occur as soon as possible so that users can make corrections while they still have the same context in mind and any applicable reference materials at hand.

Support multi-channel applications

Web forms are a common method of applying for government services and they can be made broadly accessible, but they should not be the only method. Making an application over the phone may be more accessible to some people, especially those who do not own digital devices or do not have access to broadband. Some users may not be able to fully complete a web form without assistance, either from a trusted friend or family member, or with support from an agency employee; workflows which allow users to start an application online but complete it over the phone (or vice versa) are more adaptable to different user needs and contexts.

Treat accessibility standards as the minimum, but aim higher

All digital government services should meet the minimum standards for WCAG 2.1 Level AA and Section 508. But this is a baseline, not the bar. Truly accessible products are not only usable but delightful in their ease and simplicity of use. Clean typography, friendly color palettes, helpful and conversational language, and simple well-constructed forms and workflows—all repeatedly tested with real users drawn from diverse backgrounds and circumstances—can make the difference between services that merely exist versus those that actively support and improve the lives of beneficiaries. Unclear and inaccessible software creates burdens and increases costs over time, while delightful products are more efficient and effective—and ultimately less expensive.

Policy and program strategies to reduce burdens

In addition to the methods listed above, in our experience working with state and federal agencies we've seen that to reduce burdens on the public, deeper policy

and program change is often required. Here are several approaches we've seen work to help reduce deeply-felt burdens when accessing critical government services or are promising approaches to explore further.

Integrate benefits systems

Integrated benefits (IB) systems combine the applications process for a variety of benefits, including healthcare, food, child care, and cash benefits. These systems dramatically simplify applying for and recertifying applications for benefits by centralizing claimant information and documentation. Since many members of underserved communities are eligible for multiple benefits, IB systems can significantly reduce the administrative burden of applying for and receiving benefits. Applications for these programs often share required information, including family composition, level of income, living situation, and employment status. Reusing this information to apply for multiple services can strengthen the social safety net while reducing the difficulty in accessing these benefits.

Omit in-person requirements

Some programs require applicants to meet in person in order to verify their identity or complete an application. Often, in-person meetings are only available during normal business hours, making them especially challenging for people with limited work flexibility or whose jobs do not include paid leave time. The COVID-19 pandemic forced many agencies to eliminate or pause these requirements and demonstrated that applications can be capably managed via other channels—such as phone or video calls, or web forms. Providing optional means of communicating with an agency makes services more accessible to people with disabilities, parents with childcare responsibilities, people with unpredictable work schedules or few travel resources, and many others.

Examine recertification requirements, looking for opportunities to simplify the policies

Many programs require users to repeatedly recertify their qualifications in order to continue to receive benefits. These recertification processes can be onerous and

make it likely that users may drop out of a program because they are unable to keep up, even when they remain eligible. Agencies should carefully consider under what conditions recertification is strictly necessary, and look for opportunities to reduce the frequency or burden of that recertification process. For example, making it possible for claimants to quickly answer a few questions on a mobile-accessible web form can make recertification more accessible to more users. In our work with a state paid family and medical leave program, we successfully eliminated the need for weekly recertification by all users without any negative consequences. In general, technology vendors and agencies should carefully review practices around determining eligibility for a program to ensure they are working to eliminate waste and fraud without creating a burden for legitimate users.

Adopt reasonable identity requirements

Verifying a person's identity can be a challenging process that often creates significant burdens. Applications often rely on remote identity proofing (RIDP) which uses data from credit bureaus and other sources to confirm the identity of a user. RIDP can fail if users have insufficient credit to provide enough data, and the questions themselves are often complicated enough that answering them correctly is challenging. But RIDP is not a requirement for many services—it only needs to be deployed when an interface will return confidential information from secure sources. To ensure services are accessible, agencies should allow users to bypass RIDP or provide alternative means of identity proofing, such as calling or visiting a local office. Applications should provide a path for users to complete all other tasks, with follow up instructions for verifying their identity, rather than using identity verification to block an application. Also importantly, many commercial identity proofing products use facial recognition to match users—but most facial recognition software has well-documented racial biases that can result in higher error rates for people of color. Again, agencies and vendors should design systems that are flexible enough to support multiple paths for identity verification, and those paths should be tested with users from underserved communities to validate that they are accessible.

Simplify income and employment documentation verification

Documentation requirements are often an administrative burden and need to be simpler to accommodate a wide range of users. A range of strategies can be used to make this easier, such as using plain language and improving how states integrate with other systems to verify this data on the back end, rather than requiring people to navigate it themselves; or by allowing users to submit photographs of documents from their mobile devices. Declaring at the start of an application process what kinds of documentation will be needed—and providing guidance about where users might be able to find it—can also help people prepare for an application and make it more likely that they can complete it without assistance. Instructions for how gig workers—who are more likely to be from underserved communities—can provide alternative documentation is critical to making sure programs reach the eligible population.

Implement technology using modern software development practices

Sometimes burdens are hard to reduce because the underlying technology systems are brittle and fragmented, requiring beneficiaries and staff to navigate many different processes for one service. Modern software development practices enable more streamlined and resilient systems. These systems are also adaptable to changing policies and needs without adding complexity, which results in less burdensome experiences for both beneficiaries and staff. We recommend that agencies invest in technology that support modern best practices:

- *Compose contracts to support agile methodologies:*

Many government contracts already require agile methodologies, but others are still oriented around a schedule of deliverables. The latter cuts off opportunities to research and validate how well a technology will deliver on its outcomes, forcing vendors to ship technology that meets prescribed requirements but may not make good on its intended outcomes. Agile development practices are critical to ensuring that technology meets needs and reduces burden for a range of stakeholders from beneficiaries to agency staff.

- *Design modular technology systems:*

Many government services require solutions that can scale to hundreds of thousands or even millions of users. Agencies can reduce the risk of such solutions, and align their design with the needs of underserved communities, by building out modular software components that are loosely coupled by well-defined and documented Application Programming Interfaces (APIs). This kind of development practice makes services more flexible and adaptable to change—whether in response to user feedback or regulatory changes—while also building a foundation for long-term innovation. It can also decrease time to launch, making it much faster for agencies to get benefits into the hands and pockets of the people who need them.

All software must eventually be replaced or updated. When the time inevitably comes to modernize the software you build today, a modular approach allows you to update one simple component at a time, instead of engaging in the time-consuming and costly process to rip-and-replace an entire enterprise system.

For example, in Vermont, healthcare and financial benefit programs required submitting the same information in multiple places. When the State did research, one Vermont resident said that managing their benefits was “extremely time-consuming and frustrating.” Nava built a document uploader to solve a common problem across many benefits programs: time wasted while submitting documents by mail or in person. To build it, we used components and patterns that can be reused for other applications, including frontend design and components that can be adapted for a range of business needs; backend code for securely formatting and storing submitted documents; and an automated uploader that reliably makes documents accessible to State staff.

So, while the uploader was quickly adopted to meet Vermonters’ current needs, the State can continue to reuse and expand upon it to cover more benefits programs and quickly adapt as policies change.

- *Build technology with purpose:*

Government agencies should be skeptical of commercial off-the-shelf (COTS) solutions to digital service design. Adapting COTS to fit the specific needs of a program and the people it serves can be a time-consuming process, often with unexpected costs, resulting in inflexible and difficult-to-maintain systems. Government services need to be adaptable and flexible to changing user needs or evolving policies; COTS products often promise to be faster to implement but can be brittle in response to changing requirements and are likely to be more expensive in the long run than those that purpose-built, human-centered development processes can deliver. Using monolithic COTS applications often makes it more difficult to craft services and products that are attentive to the needs of underrepresented communities. A more nimble, hybrid approach would adopt small, constrained COTS applications for specific purposes (e.g., email delivery) but connect those services via modular API development practices to other custom-built products that can be designed with close community engagement.

3. Answers to questions in the request for comment

Question 3: Have you experienced any unintended consequences from agencies' burden-reduction efforts? For example, have an agency's attempts to reduce one burden created others, either for members of the public or for agency officials?

It is important that agencies consider the unintended consequences of their burden-reduction efforts. In particular, we have seen how tactics that shift burdens from the public to staff can work against the agency's goals if there's no mitigation strategy. This has shown up in our work in two ways. First, shifting burdens to the staff can sometimes end up causing a different burden to the public — waiting longer to receive support from staff or for staff to complete tasks. We've seen this happen when the agency doesn't introduce other measures

to offset increased workload, such as hiring more staff or leveraging technology to streamline staff workflows. Second, we've seen staff performance incentives designed around existing processes, which means that alternative processes that remove burdens might not be adopted.

Question 5: Are there existing legal impediments that have slowed or stopped efforts to identify or reduce burdens? If so, please describe examples, especially those that you believe would have the greatest burden-reduction impact.

Our work has also shown us how legal impediments can impact initiatives to reduce burden and the limits of technology and human-centered design alone on reducing burdens when there's underlying complexity at the policy level. For, example, in our work designing integrated eligibility and enrollment applications, which streamline the application process for multiple safety-net programs into a single application, we have seen how different program requirements can impede burden-reduction. In our case, different requirements from the Centers for Medicaid & Medicare Services (CMS) and Food and Nutrition Services (FNS) caused our team to implement workarounds that, while viable, did ultimately transfer complexity to the end user. For more details about the specific conflicting requirements, see "[Healing Policy Papercuts: How Aligning Small Conflicts In Application Requirements Makes Benefits Easier To Access](#)". These kinds of policy issues are difficult to change - they can require cross-agency collaboration, updating regulations and even legislation, and the input of many stakeholders. However, any agency that is interested in reducing administrative burdens should consider when it actually serves their long term interest best to invest in policy-level change.