

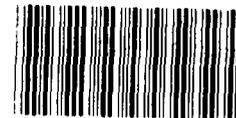
GAO

Fact Sheet for the Ranking Minority
Member, Subcommittee on Oversight of
Government Management, Committee on
Governmental Affairs, United States
Senate

May 1987

WELFARE ELIGIBILITY

Deficit Reduction Act Income Verification Issues



133177

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United States
General Accounting Office
Washington, D.C. 20548

Human Resources Division

B-226802

May 26, 1987

The Honorable William S. Cohen
Ranking Minority Member, Subcommittee on
Oversight of Government Management
Committee on Governmental Affairs
United States Senate

Dear Senator Cohen:

In July 1985, you requested that we monitor the early efforts of federal and state agencies to implement the data exchange provisions of section 2651 of the Deficit Reduction Act (DEFRA) of 1984. Section 2651 of DEFRA required state agencies responsible for administering the Aid to Families with Dependent Children, Medicaid, Food Stamp, and Unemployment Compensation¹ programs to have an income and eligibility verification system (IEVS) in place by September 30, 1986. We completed our monitoring work in January 1987.

A major requirement of the law is that states verify the accuracy of income declared by welfare applicants and recipients with tax information obtained from the Internal Revenue Service (IRS) and the Social Security Administration (SSA). The tax information for such use is reported annually to either IRS or SSA by employers, banks, insurance companies, and others and is not--except for SSA-maintained earnings data on self-employed individuals--the information provided on individual income tax returns. You asked us to focus our work on

- (1) coordination, resource, and procedural problems related to providing and using the federal data;
- (2) the states' ability to effectively use, control, verify, and keep confidential large amounts of federal data; and
- (3) the need for federal and state oversight of the use of the federal data.

On September 16, 1986, we testified before your Subcommittee on the preliminary results of our work and your proposed "Computer Matching and Privacy Protection Act of 1986"--which addressed the need for oversight of computer matching programs and the safeguarding of confidential data. Essentially, we testified

¹Under DEFRA the Unemployment Compensation program is considered a "provider" rather than a "user" of information.

that, although most respondents to a GAO questionnaire sent to 54 jurisdictions indicated they would have the required systems in place by the implementation deadline, many shared your concerns and expressed additional concerns about the new requirements.

In doing our work we identified contact persons in each state who were knowledgeable of the state's progress in meeting DEFRA's requirements. We interviewed these and other state and federal program officials, including officials of the President's Council on Management Improvement (PCMI). PCMI is composed of the senior management official of each major executive branch agency and was responsible for overseeing development of the IEVS implementing regulations. We monitored PCMI's oversight work and reviewed the final IEVS regulations, published February 28, 1986, in light of comments on the proposed regulations made by your Subcommittee, the states, and others.

To obtain information on state implementation progress and concerns about the federal implementing regulations, we sent a questionnaire in June 1986 to all 50 states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands. We received questionnaire responses from 53 of the 54 jurisdictions during July and August 1986. Michigan did not respond. The fact sheet's appendixes contain aggregate and individual state responses to the questionnaire, a compilation of the states' narrative comments, and program and population data for the 54 jurisdictions.

As agreed with your office, this fact sheet summarizes our final results. Specifically, we found states' major concerns to be

- the additional funding needed to implement the systems,
- the efficiency of existing automated systems to process IRS and SSA furnished data,
- the processing time frames required by federal regulations,
- whether costs to process and use tax data might exceed benefits,
- whether the usefulness of tax data might be impaired by its age and other factors, and
- the changes needed to meet data safeguarding requirements.

ADDITIONAL FUNDING NEEDED

Thirty-eight states indicated that additional funding (mostly unspecified) would be needed to develop and operate DEFRA income verification systems, and 16 of those states said they had no assurance that the additional funds would be available.

AUTOMATED SYSTEMS NEEDED

State income verification systems, as a practical matter, will need to be computerized. IRS requires state welfare recipient records to be on magnetic tape to facilitate processing against its files. In turn, data retrieved from IRS files will be provided to the states on magnetic tape.

Most states indicated that they planned to have a system or combination of systems in place by the implementation date of September 30, 1986, to receive, use, and safeguard federal tax data. Twenty-four of these states indicated that resources would need to be diverted from their system development efforts to set up and operate what they characterized as inefficient interim systems. The interim systems characteristically would use eligibility workers to do case investigations and manually verify data through third parties.

PROCESSING TIME FRAMES

The federal regulations required that beginning September 30, 1986, state agencies must request income data from IRS and SSA on all current recipients and, within 30 days, (1) review all data received through the IEVS system, (2) determine whether the data matches data in the state benefit files, (3) verify the data through third parties if necessary, and (4) initiate appropriate case action when warranted. However, up to 20 percent of the cases may be carried beyond 30 days because of delays in third party verification. As of January 6, 1987, 32 states had received tax data from IRS and 28 from SSA.

Because 18 states expressed concern about this issue, we sought clarification on the rule from PCMI. According to PCMI's rulemaking group, it was not mandatory for a state to process its entire caseload immediately; a state can incrementally process its caseload so long as it matches every recipient at least once during a 1-year period. We contacted 14 states and found that half had interpreted the rule to mean they could not spread their caseload over the year.

COSTS VERSUS BENEFITS

A majority of states expressed the opinion that start-up and operating costs of a system to obtain and use federal tax data would likely exceed the benefits in terms of program dollars saved. Thus, some argued that the systems should have been pilot tested by the federal government before the required implementation date. Also, four of six states responding to our question on the costs and benefits of establishing required systems to collect and record state wage data said the costs would equal or exceed the program benefits to be achieved. However, it should be noted that only 10 of the 53 responding jurisdictions said that they based their answers to our cost/benefit questions on a cost/benefit study or analysis related to the DEFRA/IEVS provisions.

USEFULNESS OF FEDERAL TAX DATA

A number of states questioned the value of using tax information to match against welfare benefit files and following up on every case provided by IRS and SSA. They believed that federal tax data would often duplicate wage information provided by state unemployment insurance programs and that it would be older than both the state wage data and state benefit file data. Consequently, states expressed reservations about spending scarce resources to establish systems for matching data of unproven value and then investigating every case identified by that data.

Nearly all states indicated in their questionnaire responses that program case files, to some extent, contain historical income data that could be compared against older federal data. At the same time, however, at least two-thirds of the states indicated that the historical data contained in their files were not automated. In their written comments, 11 states expressed concern about the usefulness of the IRS/SSA data because the federal data used in the match process are much older than the state benefit file data.

SAFEGUARDING OF FEDERAL TAX DATA

Most states indicated that they would be able to meet the federal guidelines for safeguarding federal tax data. However, 44 states said that to achieve this they would have to change an existing system or create a new one to meet IRS safeguarding agreements; 37 states said they would need to take similar action to meet SSA's safeguarding requirements for federal wage data. As of January 6, 1987, 50 jurisdictions had signed data access agreements with IRS and 41 with SSA.

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Unless you publicly announce its contents earlier, we plan no further distribution of this fact sheet until 14 days from its issue date. At that time we will send copies to the Secretaries of Health and Human Services, Agriculture, and Labor and to cognizant officials of the 50 states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands. We will also make copies available to other interested parties on request.

For additional information please contact me at 275-6193.

Sincerely yours,


Joseph F. Delfico
Senior Associate Director

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ABBREVIATIONS

AFDC	Aid to Families with Dependent Children
BENDEX	Beneficiary and Earnings Data Exchange
DEFRA	Deficit Reduction Act of 1984
GAO	General Accounting Office
HHS	Department of Health and Human Services
IEVS	income and eligibility verification system
IRS	Internal Revenue Service
PCMI	President's Council on Management Improvement
SDX	State Data Exchange
SSA	Social Security Administration
SSN	social security number
UC	Unemployment Compensation

GAO QUESTIONNAIRE ANNOTATED TO
SHOW RESPONSES OF REPLYING STATES

Appendix I presents the questionnaire in its entirety, as it was sent to the 54 jurisdictions, annotated to show aggregate responses of 51 of the 53 jurisdictions that replied. The response totals for some questions do not equal the number of respondents because jurisdictions either omitted answers without explanation or skipped the questions according to our questionnaire instructions. The responses from Alabama and North Dakota are not included because they answered the questionnaire on an individual program basis rather than consolidating their answers for the state AFDC, Medicaid, and Food Stamp programs. Their responses can be found in appendix III.

GAO QUESTIONNAIRE ANNOTATED TO
SHOW RESPONSES OF REPLYING STATES



U.S. GENERAL ACCOUNTING OFFICE
SURVEY OF STATE IMPLEMENTATION OF
THE INCOME AND ELIGIBILITY PROVISIONS
OF THE 1984 DEFICIT REDUCTION ACT

INTRODUCTION

The U.S. General Accounting Office, an agency of the U.S. Congress, is conducting a survey of the 50 states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands, as part of an effort to monitor federal and state efforts to implement the income and eligibility provisions of section 2651 of the Deficit Reduction Act of 1984 (DEFRA).

In this questionnaire we are asking the states to share their views on various DEFRA provisions; provide information about the status of their income and eligibility verification system (IEVS) development; and indicate how they plan to implement the DEFRA requirements within the required timeframes.

Please complete and return this questionnaire within two weeks, if possible. The questions can be answered by checking a box or writing in a number or a few words. We realize that some of the response choices we ask you to select from may not exactly fit the situation in your state. In this event, please select the response that most closely describes your situation.

A self-addressed, business reply envelope is enclosed for your convenience. If you have any questions, call Dick Halter or Dave Pasquarello at 215/597-4330. They will be happy to help you. Should the return envelope be misplaced, mail the completed questionnaire to:

U.S. General Accounting Office
Dave Pasquarello
434 Walnut St., 11th floor
Philadelphia, PA 19106-3797

Thank you for your assistance.

Official responsible for IEVS implementation in your state:

Name: _____

Title: _____

Agency: _____

Official responsible for filling out this questionnaire:

Name: _____

Title: _____

Agency: _____

Phone number: _____

Has the official responsible for filling out this questionnaire had experience working in any of the programs listed below? (CHECK ALL THAT APPLY.)

1. [8] Aid to Families with Dependent Children (AFDC)

2. [5] Food stamps

3. [3] Medicaid

4. [9] Unemployment Compensation

5. [0] Other (SPECIFY.)

I. OVERALL AUTOMATED SYSTEM DEVELOPMENT

The 1984 DEFRA requires each state to operate an income and eligibility verification system (IEVS) that would handle data exchanges within and between states, and receive and use tax data from both the Internal Revenue Service (IRS) and the Social Security Administration (SSA). Questions in this section refer to the system your state will be using to implement the DEFRA requirements.

1. Which of the statements below best describes how your state intends to meet DEFRA requirements. (CHECK ONE.)

1. Existing system already meets IEVS requirements or will meet all requirements with minimum modifications within the required timeframes. This system, with the necessary modifications, if any, will be the state's operational system for the foreseeable future.
--(SKIP TO QUESTION 8.)

2. A system currently planned or under development will meet or will be modified to meet the requirements within the required timeframes. This system will replace the existing system and become the state's operational system for the foreseeable future.
--(SKIP TO QUESTION 8.)

3. A system currently planned or under development will meet or will be modified to meet the requirements and will ultimately become the state's operational system for the future. However, this system cannot be implemented within the required timeframes. Therefore, the state will meet the requirements by an interim modification of an existing system, or implementation of a temporary solution to meet requirements.

2. Currently, at what stage of development is this ultimate automated system? (CHECK ONE.)

1. Fully developed but not yet fully operational

2. Development in process

3. Planning for development

3. How long after 10/1/86 do you estimate your state's ultimate system will be fully operational? (CHECK ONE.)

1. within less than 3 months

2. in 3 to less than 6 months

3. in 6 to less than 9 months

4. in 9 to less than 12 months

5. in 12 months or more

4. In your estimation, how efficiently will your state be able to meet IEVS requirements from 10/1/86 until your ultimate system becomes fully operational? (CHECK ONE.)

1. very efficiently

2. efficiently

3. inefficiently

5. Will resources need to be diverted from development of your ultimate system to modify an existing system, or to implement a temporary solution, to meet DEFRA requirements? (CHECK ONE.)

1. Yes

2. No--(SKIP TO QUESTION 8.)

6. To what extent, if any, will this diversion of resources from the development of your jurisdiction's ultimate system contribute to a delay in its eventual implementation? (CHECK ONE.)

- 1. To a very great extent
- 2. To a great extent
- 3. To a moderate extent
- 4. To some extent
- 5. To little or no extent
-->(SKIP TO QUESTION 8.)

7. If your jurisdiction did not have to take the measure of modifying an existing system, or implementing a temporary solution, solely to meet the 10/1/86 deadline, how much earlier do you estimate your jurisdiction would be able to implement its ultimate system? (CHECK ONE.)

- 1. less than 1 month earlier
- 2. from 1 to less than 3 months earlier
- 3. from 3 to less than 6 months earlier
- 4. from 6 to less than 9 months earlier
- 5. from 9 to less than 12 months earlier
- 6. 12 months earlier or more

8. Beyond your current programming budget, will your jurisdiction need additional funds to implement the DEFRA requirements within the required timeframe?

- 1. Yes
- 2. No -->(SKIP TO QUESTION 11.)

9. Indicate whether or not you plan to obtain any of the needed funds from each of the sources listed below. (CHECK ONE BOX FOR EACH SOURCE.)

	YES	NO
	1	2
1. Federal funding	30	6
2. State funding	24	12
3. Reprogram funds from other programs	10	26
4. Other (SPECIFY.)	4	32

10. Can these additional funds be obtained by 10/1/86? (CHECK ONE.)

- 1. Definitely yes
- 2. Probably yes
- 3. Probably no
- 4. Definitely no

Note: See page 28 of this appendix for footnotes regarding recorded responses to questions 6 and 7.

II. INCOME AND ELIGIBILITY VERIFICATION SYSTEM PROFILE

11. In SECTION A enter the number of the statement below that best describes how your state met each DEFRA requirement as of 5/29/86.

1. The 5/29/86 deadline was waived by a federal agency until 10/1/86.
2. The requirement was met as of 5/29/86 using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system for the foreseeable future.
3. The requirement was met as of 5/29/86 using the state's existing system (with minimal, if any, modifications). This same system will be the state's operational system for the foreseeable future.
4. The requirement was met as of 5/29/86 using a newly developed system (whether or not it was based on an existing state system). This same system will be the state's operational system for the foreseeable future.

For each requirement for which your response in SECTION A is either statement "1" or "2", in SECTION B enter the number of the statement below that best describes how your state plans to fulfill each DEFRA requirement as of 10/1/86.

1. As of 10/1/86 the requirement will be met using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system in the foreseeable future.
2. As of 10/1/86 the requirement will be met using a system that will be the state's ultimate operational system for the foreseeable future.

In SECTION C indicate whether, currently, each provision is fully, partially, or not yet implemented in your state. (CHECK ONE BOX FOR EACH PROVISION.)

In SECTION D indicate whether your state believes the cost (in terms of start up and operation dollars, time and human effort) expended to implement each provision is worth the potential benefit (in terms of program dollars saved.) (CHECK ONE BOX FOR EACH PROVISION. DO NOT RESPOND IN SHADED BOXES.)

	<u>SECTION A</u> HOW STATE MET RE- QUIREMENT AS OF 5/29/86?		<u>SECTION B</u> HOW STATE WILL MEET REQUIREMENT AS OF 10/1/86?		<u>SECTION C</u> CURRENT IMPLEMENTATION?			<u>SECTION D</u> COST VS. BENEFIT?		
	1-35	3-5	1-27		FULL	PAR-	NONE	COST	COST	BENEFIT
	2-8	4-0	2-16		TIAL			EXCEEDS	EQUALS	EXCEEDS
								BENEFIT	BENEFIT	COST
					1	2	3	4	5	6
1. Use standard record formats	1-35	3-5	1-27							
	2-8	4-0	2-16		6	23	20	16	17	10
2. Obtain and verify program applicants' and family members' SSN	1-30									
	2-8		1-24							
	3-13		2-14		18	28	5	5	19	20
	4-0									
3. Validate program applicants'/recipients' SSN with SSA Third Party Query, Bendex, or Enumeration/validation system	1-33									
	2-9		1-24							
	3-9		2-18							
	4-0				9	37	5	7	18	18
4. Obtain and use state wage data for income/eligibility verification	1-19									
	2-10		1-20		17	27	0	10	5	24
	3-15		2-9							
	4-0									

In SECTION A enter the number of the statement below that best describes how your state met each DEFRA requirement as of 5/29/86.

1. The 5/29/86 deadline was waived by a federal agency until 10/1/86.
2. The requirement was met as of 5/29/86 using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system for the foreseeable future.
3. The requirement was met as of 5/29/86 using the state's existing system (with minimal, if any, modifications). This same system will be the state's operational system for the foreseeable future.
4. The requirement was met as of 5/29/86 using a newly developed system (whether or not it was based on an existing state system). This same system will be the state's operational system for the foreseeable future.

For each requirement for which your response in SECTION A is either statement "1" or "2", in SECTION B enter the number of the statement below that best describes how your state plans to fulfill each DEFRA requirement as of 10/1/86.

1. As of 10/1/86 the requirement will be met using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system in the foreseeable future.
2. As of 10/1/86 the requirement will be met using a system that will be the state's ultimate operational system for the foreseeable future.

In SECTION C indicate whether, currently, each provision is fully, partially, or not yet implemented in your state. (CHECK ONE BOX FOR EACH PROVISION.)

In SECTION D indicate whether your state believes the cost (in terms of start up and operation dollars, time and human effort) expended to implement each provision is worth the potential benefit (in terms of program dollars saved.) (CHECK ONE BOX FOR EACH PROVISION. DO NOT RESPOND IN SHADED BOXES.)

	<u>SECTION A</u>		<u>SECTION B</u>			<u>SECTION C</u>			<u>SECTION D</u>					
	HOW STATE MET REQUIREMENT AS OF 5/29/86?		HOW STATE WILL MEET REQUIREMENT AS OF 10/1/86?			CURRENT IMPLEMENTATION?			COST VS. BENEFIT?					
	1	2	1	2	3	FULL	PAR-	NONE	COST	COST	BENEFIT			
						INITIAL			EXCEEDS	EQUALS	EXCEEDS			
									BENEFIT	BENEFIT	COST			
						1	2	3	4	5	6			
5. Exchange data between needs-based programs within your state	1 - 20	2 - 13	3 - 17	4 - 0	1 - 27	2 - 6			24	24	3	9	8	29
6. Exchange wage and needs-based program data with other states	1 - 27	2 - 11	3 - 5	4 - 1	1 - 26	2 - 12	2	21	21			22	12	7
7. Obtain and use IRS tax data for income/eligibility verification	1 - 50	2 - 0	3 - 0	4 - 0	1 - 30	2 - 20			0	8	43	29	9	5
8. Obtain and use SSA tax (wage, private pension & self-employment) data for income/eligibility verification	1 - 42	2 - 6	3 - 2	4 - 0	1 - 32	2 - 16	2	22	27			33	6	6

In SECTION A enter the number of the statement below that best describes how your state met each DEBRA requirement as of 5/29/86.

1. The 5/29/86 deadline was waived by a federal agency until 10/1/86.
2. The requirement was met as of 5/29/86 using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system for the foreseeable future.
3. The requirement was met as of 5/29/86 using the state's existing system (with minimal, if any, modifications). This same system will be the state's operational system for the foreseeable future.
4. The requirement was met as of 5/29/86 using a newly developed system (whether or not it was based on an existing state system). This same system will be the state's operational system for the foreseeable future.

For each requirement for which your response in SECTION A is either statement "1" or "2", in SECTION B enter the number of the statement below that best describes how your state plans to fulfill each DEBRA requirement as of 10/1/86.

1. As of 10/1/86 the requirement will be met using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system in the foreseeable future.
2. As of 10/1/86 the requirement will be met using a system that will be the state's ultimate operational system for the foreseeable future.

In SECTION C indicate whether, currently, each provision is fully, partially, or not yet implemented in your state. (CHECK ONE BOX FOR EACH PROVISION.)

In SECTION D indicate whether your state believes the cost (in terms of start up and operation dollars, time and human effort) expended to implement each provision is worth the potential benefit (in terms of program dollars saved.) (CHECK ONE BOX FOR EACH PROVISION. DO NOT RESPOND IN SHADED BOXES.)

	SECTION A	SECTION B	SECTION C			SECTION D		
	HOW STATE MET RE- QUIREMENT AS OF 5/29/86?	HOW STATE WILL MEET REQUIREMENT AS OF 10/1/86?	CURRENT IMPLEMENTATION?			COST VS. BENEFIT?		
			FULL	PAR-	NONE	COST	COST	BENEFIT
			[TIAL]	EXCEEDS	EQUALS	EXCEEDS
						BENEFIT	BENEFIT	COST
			1	2	3	4	5	6
9. Safeguard IRS tax data								
10. Safeguard SSA tax data								
11. Safeguard your state's wage and needs-based program data								
12. Safeguard other states' wage and needs-based program data								

In SECTION A enter the number of the statement below that best describes how your state met each DEFRA requirement as of 5/29/86.

1. The 5/29/86 deadline was waived by a federal agency until 10/1/86.
2. The requirement was met as of 5/29/86 using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system for the foreseeable future.
3. The requirement was met as of 5/29/86 using the state's existing system (with minimal, if any, modifications). This same system will be the state's operational system for the foreseeable future.
4. The requirement was met as of 5/29/86 using a newly developed system (whether or not it was based on an existing state system). This same system will be the state's operational system for the foreseeable future.

For each requirement for which your response in SECTION A is either statement "1" or "2", in SECTION B enter the number of the statement below that best describes how your state plans to fulfill each DEFRA requirement as of 10/1/86.

1. As of 10/1/86 the requirement will be met using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system in the foreseeable future.
2. As of 10/1/86 the requirement will be met using a system that will be the state's ultimate operational system for the foreseeable future.

In SECTION C indicate whether, currently, each provision is fully, partially, or not yet implemented in your state. (CHECK ONE BOX FOR EACH PROVISION.)

In SECTION D indicate whether your state believes the cost (in terms of start up and operation dollars, time and human effort) expended to implement each provision is worth the potential benefit (in terms of program dollars saved.) (CHECK ONE BOX FOR EACH PROVISION. DO NOT RESPOND IN SHADED BOXES.)

	<u>SECTION A</u>		<u>SECTION B</u>		<u>SECTION C</u>			<u>SECTION D</u>					
	HOW STATE MET REQUIREMENT AS OF 5/29/86?		HOW STATE WILL MEET REQUIREMENT AS OF 10/1/86?		CURRENT IMPLEMENTATION?			COST VS. BENEFIT?					
					FULL	PAR-	NONE	COST	COST	BENEFIT			
					TIAL			EXCEEDS	EQUALS	EXCEEDS			
								BENEFIT	BENEFIT	COST			
					1	2	3	4	5	6			
13. Take appropriate action on cases identified by IRS or SSA tax data within 30 days	1-49	2-1	3-0	4-0	1-28	2-22		0	11	40	33	6	6
14. Track record volume and report annually	1-48	3-1	2-1	4-0	1-29	2-20		0	15	35	29	12	4
15. Track case disposition and report annually	1-48	3-1	2-1	4-0	1-31	2-18		1	13	37	34	7	4

12. A coordinating agency or agencies will be needed in each state to handle data exchanges with the IRS Information Returns Processing (IRP) system and the SSA Bendex system. Please indicate how your state will be structured to accomplish this. (CHECK ONE.)

- 1. a single agency will be responsible for coordinating your state's data exchanges with both SSA and IRS systems
- 2. separate agencies will be responsible for coordinating your state's data exchanges with SSA and IRS systems

Questions 13 through 19 refer to the functions of this coordinating agency (or agencies if IRS and SSA data are each handled by a separate agency). Answer them in regard to how it (or they) will be functioning as of 10/1/86.

13. Indicate whether or not your state coordinating agency will screen IRS output files to eliminate cases in which data shows accurate income was reported by applicant/recipient.

- 1. Yes -- (CONTINUE.)
- 2. No --- (SKIP TO QUESTION 15.)

In questions 14 and 15 "case followup" refers to determination of differences between applicant/recipient-provided data and IEVS data through record comparisons; verification with applicant/recipient or third party where differences do exist; and case investigation and fraud referral where warranted.

14. Will your state coordinating agency perform IRS case followup independent of counties, user agencies, or caseworkers in your state?

- 1. Yes -- (SKIP TO QUESTION 16.)
- 2. No -- (CONTINUE.)

15. Indicate whether or not your state coordinating agency will be responsible for sorting and distributing IRS data files in each of the ways listed below. (CHECK ONE BOX FOR EACH ROW.)

	YES	NO
	1	2
1. Sort IRS output file by caseworker within each user agency and distribute subfiles to agencies for screening and case followup	28	18
2. Sort IRS output file by state user agency and distribute subfiles to each for screening and case followup	21	25
3. Sort IRS output file by county and distribute subfiles to each for screening and case followup	29	17

16. Indicate whether or not your state coordinating agency will screen SSA output files to eliminate cases in which data shows accurate income was reported by applicant/recipient.

- 1. Yes -- (CONTINUE.)
- 2. No --- (SKIP TO QUESTION 18.)

17. Will your state coordinating agency perform SSA case followup independent of counties, user agencies, or caseworkers in your state?

- 1. Yes -- (SKIP TO QUESTION 19.)
- 2. No --- (CONTINUE.)

APPENDIX I

APPENDIX I

18. Indicate whether or not your state coordinating agency will be responsible for sorting and distributing SSA data files in each of the ways listed below. (CHECK ONE BOX FOR EACH ROW.)

	YES	NO
	1	2
1. Sort SSA output file by caseworker within each user agency and distribute subfiles to agencies for screening and case followup	31	15
2. Sort SSA output file by state user agency and distribute subfiles to each for screening and case followup	25	21
3. Sort SSA output file by county and distribute subfiles to each for screening and case followup	29	17

III. USE OF SOCIAL SECURITY NUMBERS

19. Indicate whether or not your state currently requires applicants and family members to provide their social security numbers (SSNs) to each of the programs listed below. (CHECK ONE BOX FOR EACH PROGRAM.)

STATE REQUIRES SSN FROM...

	APPLI- CANTS ONLY	BOTH APPLI- CANTS AND FAMILY	NEITHER APPLI- CANTS NOR FAMILY
	1	2	3
1. Medicaid	6	42	2
2. Aid to Families with Dependent Children (AFDC)	3	47	0
3. Food Stamps	4	46	0

20. How does the cost (in terms of dollars, time, and human effort) of each of the following initiatives compare to its potential benefit (in terms of program dollars saved)? (CHECK ONE BOX FOR EACH ROW.)

	COST EXCEEDS BENE- FIT	COST EQUALS BENE- FIT	BENE- FIT EXCEEDS COST
	1	2	3
	1. Modify existing application forms to facilitate SSN verification	9	24
2. Case worker training to implement SSN verification	8	23	13

21. Which SSA system does your state most often use to validate a program recipient's SSN? (CHECK ONE.)

- 1. Third party query system
- 2. Bendex system
- 3. Enumeration/validation system

22. About how long, on average, does it take SSA to answer your state's requests for SSN validation with the system your state most often uses? (CHECK ONE.)

- 1. Less than 1 day
- 2. 1 day to less than 1 week
- 3. 1 week to less than 2 weeks
- 4. 2 weeks to less than 3 weeks
- 5. 3 weeks to less than 4 weeks
- 6. 4 weeks or more
- 7. Can't determine--very little experience with SSA

23. In your opinion, how accurate are SSA's responses to your state's requests for SSN validation? (CHECK ONE.)

- 1. very accurate (99-100%)
- 2. accurate (95-98%)
- 3. inaccurate (94% or less)

IV. STATE WAGE REPORTING

24. Is your state currently a wage reporting state?
1. Yes -> (SKIP TO QUESTION 31.)
2. No
25. Which of the statements listed below best describes how your state will fulfill the DEFRA requirement to collect and record state wage data? (CHECK ONE.)
1. adopt or create an entirely new system
2. totally or almost totally redesign an existing state system
3. make moderate changes to an existing state system
4. make minimal changes to an existing state system
5. use an existing state system essentially as it stands
26. Will this system also be used for unemployment compensation purposes?
1. Yes
2. No
27. Indicate whether your state believes the start up and operating costs to collect and record state wage data will exceed, equal, or fall short of the potential benefit (in terms of program dollars saved). (CHECK ONE.)
1. cost exceeds benefit
2. cost equals benefit
3. cost falls short of benefit
28. Will this system require changes in your state's laws?
1. Yes
2. No
29. Will your state need special funding to start up and/or operate this system?
1. Yes
2. No
30. Will your state begin quarterly wage reporting by 9/30/88? (CHECK ONE.)
1. Definitely yes
2. Probably yes
3. Probably not
4. Definitely not

V. NEEDS-BASED AND WAGE DATA EXCHANGES WITHIN YOUR STATE

31. Listed below are the programs that must access and use state wage data. In each program, is this process currently automated or manual? (CHECK ONE BOX FOR EACH PROGRAM.)

	AUTOMATED --MOSTLY OFF-LINE	AUTOMATED --AS OFTEN OFF-LINE AS ON-LINE	AUTOMATED --MOSTLY ON-LINE	MANUAL	NOT APPLICA- BLE-- STATE WAGE DATA NOT ACCESSED
	1	2	3	4	5
1. Medicaid	18	6	9	2	15
2. AFDC	26	9	8	1	7
3. Food Stamps	24	8	9	3	7

32. Currently, how compatible, if at all, is your state's automated wage reporting system with the systems of each of the programs listed below? (CHECK ONE BOX FOR EACH PROGRAM.)

	COMPATIBLE	SOMEWHAT COMPATIBLE	INCOMPATIBLE
	1	2	3
1. Medicaid	24	12	6
2. AFDC	27	12	5
3. Food stamps	27	12	5

33. We would like to know how your state's privacy/confidentiality laws affect data exchanges, in general, in your state. Do your state's privacy/confidentiality laws facilitate, neither facilitate nor hinder, or hinder these exchanges, in general? (CHECK ONE.)

- 1. greatly facilitate
- 2. somewhat facilitate
- 3. neither facilitate nor hinder
- 4. somewhat hinder
- 5. greatly hinder

34. Consider the Medicaid, AFDC, and Food Stamps programs in your state. Which of the statements below best describes how these programs are administered in your state? (CHECK ONE.)

- 1. All three programs are administered by the same department
--(SKIP TO QUESTION 36.)
- 2. Two out of the three programs are administered by the same department
- 3. Each of the three programs is administered by a different department

35. Consider the fact that not all of these needs-based programs are administered by the same department in your state. Does this facilitate, neither facilitate nor hinder, or hinder data exchanges, in general, between these programs? (CHECK ONE.)

- 1. greatly facilitates
- 2. somewhat facilitates
- 3. neither facilitates nor hinders
- 4. somewhat hinders
- 5. greatly hinders

VI. DEFRA 30 DAY ACTION DEADLINE

36. Listed below are four procedures associated with handling the tax data provided to the states by IRS and SSA. We would like to know how, and at what level, each will be performed under the system your state will implement by 10/1/86.

In SECTION A indicate whether each procedure will be done manually or automatically. (CHECK ONE BOX FOR EACH PROCEDURE.)

In SECTION B indicate at what level each procedure will be performed in your state. (CHECK ONE BOX FOR EACH PROCEDURE.)

	SECTION A HOW PROCEDURE WILL BE PERFORMED			SECTION B LEVEL AT WHICH PROCEDURE WILL BE PERFORMED		
	MOST OFTEN MANUALLY	AS OFTEN MANUALLY AS AUTOMATICALLY	MOST OFTEN AUTOMATICALLY	MOST OFTEN AT THE ELIGIBILITY WORKER LEVEL	AS OFTEN AT THE ELIGIBILITY WORKER LEVEL AS ABOVE	MOST OFTEN ABOVE THE ELIGIBILITY WORKER LEVEL
	1	2	3	4	5	6
1. Screening to eliminate cases where client-provided and IRS data agree	33	7	10	33	2	15
2. Screening to eliminate cases where client-provided and SSA data agree	27	12	11	33	4	13
3. Third party validation of cases where client-provided and IRS data are discrepant	46	4	0	42	3	5
4. Third party validation of cases where client-provided and SSA data are discrepant	45	5	0	43	4	3

37. Do you anticipate, initially, greater numbers of cases that require followup than you expect as the program progresses? (CHECK ONE.)

- 1. Definitely yes
- 2. Probably yes
- 3. Probably no -> SKIP TO QUESTION 41.)
- 4. Definitely no -> SKIP TO QUESTION 41.)

38. In approximately what proportion of the initial cases identified with federal data will your state realistically be able to take action within 30 days after receipt of this data? (CHECK ONE.)

- 1. 100%--all or almost all cases
- 2. 60-79%--most cases
- 3. 40-59%--about half the cases
- 4. 20-39%--some cases
- 5. 0-19%--few, if any, cases

39. Will your state have enough staff on hand to follow up on and complete most of these initial cases within the 30 day timeframe? (CHECK ONE.)

- 1. Definitely yes -> SKIP TO QUESTION 41.)
- 2. Probably yes -> SKIP TO QUESTION 41.)
- 3. Probably no
- 4. Definitely no

40. Indicate whether or not your state is planning to deal with this staff shortage in each of the following ways. (CHECK ONE BOX IN EACH ROW.)

	YES	NO
	1	2
1. Seek funding for additional staff	15	23
2. Divert staff from other functions	14	24
3. Make your best effort to meet 30 day deadline with staff on hand	34	4
4. Prioritize cases	32	6
5. Contract for services	0	38
6. Other (SPECIFY.)	1	37

41. According to your state's due process laws, how many days is each type of program recipient listed below given to respond to an adverse action notice? (ENTER NUMBER FOR EACH TYPE OF RECIPIENT.)

	NUMBER OF DAYS TO RESPOND	
1. Medicaid	10 days	-39
	11-20 days	- 6
	Over 20 days	- 5
2. AFDC	10 days	-40
	11-20 days	- 6
	Over 20 days	- 5
3. Food stamps	10 days	-37
	11-20 days	- 6
	Over 20 days	- 7

42. Indicate whether or not your state plans to take each of the actions listed below, once your state IEVS is fully implemented, to attempt to reconcile the DEFRA 30 day action deadline with your state's right to due process laws. (CHECK ONE BOX FOR EACH ACTION.)

	DEF- FINI- TLY YES	PRO- BABLY YES	UN- CER- TAIN	PRO- BABLY NO	DEF- FINI- TLY NO
	1	2	3	4	5
1. Streamline the case follow-up process to shorten case processing time	12	18	10	9	2
2. Increase the number of eligibility workers	1	1	14	17	17
3. Make the best effort to comply with DEFRA as well as state laws given available resources	33	14	3	0	1
4. Other (SPECIFY.) 4 states responded					

VII. EXCHANGING NEEDS-BASED PROGRAM DATA WITH OTHER STATES

43. With how many states does your state currently have an ongoing agreement for the exchange of needs-based program data? (ENTER NUMBER. IF NONE, ENTER "0".)

0	states	- 34
4	"	- 4
2	"	- 8
4	"	- 1
5	"	- 1
6	"	- 2
15	"	- 1

44. In how many of these agreements are there specific provisions safeguarding the confidentiality of the data exchanged? (ENTER NUMBER. IF NONE, ENTER "0".)

0	agreements	- 37
1	"	- 4
2	"	- 6
5	"	- 1
6	"	- 2
15	"	- 1

45. Listed below are factors that might affect two states' ability to reach an IEVS data exchange agreement. Indicate what effect, if any, each has on your state's ability to reach such agreements. (CHECK ONE BOX FOR EACH FACTOR.)

	GREATLY IMPEDES	SOMEWHAT IMPEDES	NEITHER IMPEDES NOR PROMOTES	SOMEWHAT PROMOTES	GREATLY PROMOTES
	1	2	3	4	5
1. States' privacy/confidentiality laws	5	16	25	2	0
2. Compatibility of states' computer systems	9	20	17	2	1
3. One of the two states may discourage interstate exchanges	16	18	14	1	0
4. Compatibility of states' record file layouts	11	21	14	2	1
5. Other (SPECIFY.) 6 states responded					

46. In your opinion, which of these factors is the greatest impediment to your state's ability to reach IEVS data exchange agreements with other states? (CHECK ONE.)
1. States' privacy/confidentiality laws
 2. Compatibility of states' computer systems
 3. One of the two states might discourage interstate exchanges
 4. Compatibility of states' record file formats
 5. Other (SPECIFY.)

47. Please describe any other reasons why your state has difficulty reaching data exchange agreements with other states.

18 states commented

VIII. CASE VOLUME & DISPOSITION TRACKING SYSTEM

48. DEFRA regulations require states to establish a system to annually account for the volume and disposition of cases identified through an IEVS. Which of the statements listed below best describes how your state plans to account for record volume and case action to comply with this DEFRA requirement by 10/1/86? (CHECK ONE.)
1. Both record volume accounting and case action tracking will be done manually
 2. Record volume accounting will be done manually; case action tracking will be automated
 3. Record volume accounting will be automated; case action tracking will be done manually
 4. Both record volume accounting and case action tracking will be automated

IX. STATE'S USE OF IRS AND SSA TAX DATA

49. Has your state signed final tax data exchange agreements with the IRS and/or SSA? (CHECK ONE.)

1. Signed agreement with IRS but not SSA

4. Did not sign agreement with IRS or SSA.

2. Signed agreements with both IRS and SSA

3. Signed agreement with SSA but not IRS

50. Indicate the statement that best describes what your state will have to do to meet the safeguarding agreements for each of the four types of tax data listed below. (CHECK ONE BOX FOR EACH TYPE OF DATA.)

	ADOPT/ CREATE NEW SYSTEM	EXTEN- SIVELY CHANGE EXISTING SYSTEM	MODERATELY CHANGE EXISTING SYSTEM	MINIMALLY CHANGE EXISTING SYSTEM	USE EXISTING SYSTEM AS IT STANDS
	1	2	3	4	5
1. IRS unearned income data	17	7	15	5	5
2. SSA wage data	7	6	15	9	13
3. SSA private pension data	7	6	14	9	14
4. SSA self-employment income data	9	7	13	8	13

51. In SECTION A indicate how often, if ever, case files from each of the programs listed below contain historical income data that can be compared with older IRS and SSA tax data? (CHECK ONE BOX FOR EACH PROGRAM.)

In SECTION B indicate whether or not this historical case income data is automated when it is available. (CHECK ONE BOX FOR EACH PROGRAM.)

SECTION A
CASEFILES CONTAIN
HISTORICAL CASE
INCOME DATA...
(CHECK ONE.)

SECTION B
HISTORICAL CASE
INCOME DATA
AUTOMATED?
(CHECK ONE.)

	ALWAYS OR ALMOST ALWAYS	SOMETIMES	RARELY, IF EVER	YES	NO	NOT AP- PLICABLE CASE DATA RARELY, IF EVER, EXISTS
	1	2	3	4	5	6
1. Medicaid	28	15	7	9	36	5
2. AFDC	28	15	8	11	34	6
3. Food stamps	28	15	7	12	33	5

X. ADDITIONAL INFORMATION

52. Beyond its base requirements, DEFRA also encourages states to access and use other sources of information to verify the eligibility of program applicants/recipients.

In SECTION A indicate whether or not your state currently uses, or is planning to use each of the information sources listed below for eligibility verification. (CHECK ONE BOX FOR EACH SOURCE.)

For each source your state is currently using, indicate in SECTION B whether the eligibility verification process is most often automated or manual. (CHECK ONE BOX FOR EACH SOURCE YOUR STATE CURRENTLY USES.)

SECTION A
STATE CURRENTLY USES?

SECTION B
VERIFICATION PROCESS...

	<u>SECTION A</u>			<u>SECTION B</u>		
	YES, STATE CURRENTLY USES	NO, BUT STATE PLANS TO USE	STATE NEITHER USES NOR PLANS TO USE	AUTOMATED ON-LINE	AUTOMATED OFF-LINE	MANUAL
	1	2	3	4	5	6
1. Birth records	33	3	14	5	0	30
2. Death records	30	3	17	3	5	25
3. Marriage records	27	2	21	1	0	27
4. Divorce records	26	2	22	1	0	26
5. Drivers' license records	25	4	20	8	6	12
6. Auto registration records	33	9	8	16	10	13
7. Selective service records	5	0	44	0	0	5
8. Police records	11	1	37	1	2	9
9. Tax records (other than fed.)	14	8	26	1	3	12
10. Housing records	18	4	28	1	0	18
11. Bank records	32	6	12	1	4	29
12. Insurance records	24	1	25	0	2	22
13. Credit records	13	0	36	1	3	9
14. Other (SPECIFY.) (10 states responded with 1 to 3 sources)	(13)	(5)	(0)	(3)	(9)	(6)

53. In responding to the cost vs. benefit questions earlier in this questionnaire, were any of your responses based on actual studies or analyses your state has done?

1. [1] Yes

2. [39] No--(SKIP TO QUESTION 55.)

54. We are interested in obtaining the results of any cost/benefit studies or analyses your state has done, related to the DEFRA, IEVS provisions. However, we would like you to give priority to the completion and return of this questionnaire. Under separate cover and at your convenience, please send a copy of such reports to us at the address shown on the front of this form.

(1 study received)

55. Please write comments you might have about the DEFRA regulations, in general, or its provisions or impact, in particular, in the space below.

(33 states commented--see app. IV for an analysis of those comments)

GAO Footnotes to Questions 6 and 7:

1. Because West Virginia did not respond to questions 1 through 5, its responses to the related questions 6 and 7 have been classified by GAO as "non-responsive."
2. The District of Columbia responded to question 6 but did not respond to the choices given in question 7; however, it provided the following comment: "It can't be done by 10/1/86."
3. Puerto Rico did not respond to question 7 but did respond to question 6.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

This appendix includes detailed questionnaire data formatted according to the questions asked and the responses received. For easy reference, each question is shown with each jurisdiction's corresponding reply. Since Alabama and North Dakota responded to the questionnaire by individual program, their responses are not included in this appendix but can be found in appendix III.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

		Program Experience of Officials Filling out this Questionnaire				
STATE OR JURISDICTION	ABBREY.	AFDC	FS	MED	UC	OTH
Alaska	AK	x	x	x		x
Arizona	AZ	x	x			x
Arkansas	AR	x	x	x		
California	CA	x	x	x		
Colorado	CO		x			
Connecticut	CT					x
Delaware	DE	x	x			
Dist. of Col.	DC	x	x	x		
Florida	FL	x	x	x		
Georgia	GA	x	x	x		
Guam	GU	x	x	x		x
Hawaii	HI	x	x	x		x
Idaho	ID	x	x	x		
Illinois	IL	x	x	x	x	x
Indiana	IN	x	x	x		
Iowa	IA	x	x	x	x	
Kansas	KS	x	x	x		x
Kentucky	KY	x		x		
Louisiana	LA	x	x	x		
Maine	ME	x	x	x	x	x
Maryland	MD	x	x	x		x
Massachusetts	MA	x	x	x		
Minnesota	MN	x	x	x		
Mississippi	MS	x	x	x		x
Missouri	MO	x	x	x		x
Montana	MT	x	x	x		x
Nebraska	NE	x	x	x		x
Nevada	NV	x	x	x		
New Hampshire	NH	x		x		x
New Jersey	NJ	x	x	x	x	x
New Mexico	NM	x	x	x		
New York	NY	x	x	x		
North Carolina	NC	x		x		
Ohio	OH	x	x			
Oklahoma	OK	x	x	x		
Oregon	OR	x	x	x		
Pennsylvania	PA	x	x	x		
Puerto Rico	PR	x				
Rhode Island	RI	x	x	x		
South Carolina	SC	x	x	x	x	
South Dakota	SD		x			
Tennessee	TN	x	x	x		
Texas	TX	x	x	x	x	x
Utah	UT	x	x	x		
Vermont	VT	x	x	x		x
Virgin Islands	VI	x				x
Virginia	VA	x	x	x		x
Washington	WA	x	x	x	x	
West Virginia	WV	x	x	x	x	
Wisconsin	WI	x	x	x	x	x
Wyoming	WY	x	x	x		

Has the official responsible for filling out this questionnaire had experience working in any of the programs listed below? (CHECK ALL THAT APPLY.)

1. [] Aid to Families with Dependent Children (AFDC)

2. [] Food stamps

3. [] Medicaid

4. [] Unemployment Compensation

5. [] Other (SPECIFY.)

LEGEND:

AFDC - Aid to Families with Dependent Children

FS - Food Stamp

MED - Medicaid

UC - Unemployment Compensation

OTH - Other

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question			
		2	3	4	5
2. Currently, at what stage of development is this ultimate automated system? (CHECK ONE.)	AK	2	1	2	1
	AZ	2	5	2	2
1. [] Fully developed but not yet fully operational	AR	*	*	*	*
	CA	2	5	3	2
	CO	3	3	3	1
2. [] Development in process	CT	3	5	3	1
	DE	*	*	*	*
	DC	2	4	2	1
3. [] Planning for development	FL	*	*	*	*
	GA	*	*	*	*
3. How long after 10/1/86 do you estimate your state's ultimate system will be fully operational? (CHECK ONE.)	GU	3	5	2	1
	HI	2	5	2	2
1. [] within less than 3 months	ID	*	*	*	*
	IL	*	*	*	*
	IN	*	*	*	*
2. [] in 3 to less than 6 months	IA	*	*	*	*
	KS	2	4	3	1
3. [] in 6 to less than 9 months	KY	*	*	*	*
	LA	*	*	*	*
4. [] in 9 to less than 12 months	ME	2	3	2	1
	MD	3	5	3	1
5. [] in 12 months or more	MA	3	5	3	1
	MN	3	5	3	1
4. In your estimation, how efficiently will your state be able to meet IEVS requirements from 10/1/86 until your ultimate system becomes fully operational? (CHECK ONE.)	MS	2	5	3	1
	MO	*	*	*	*
	MT	*	*	*	*
	NE	3	4	3	1
	NV	2	5	3	1
1. [] very efficiently	NH	*	*	*	*
	NJ	2	5	3	1
	NM	1	2	2	2
2. [] efficiently	NY	2	5	3	1
	NC	2	4	2	2
	OH	2	5	3	1
3. [] inefficiently	OK	*	*	*	*
	OR	2	5	3	2
5. Will resources need to be diverted from development of your ultimate system to modify an existing system, or to implement a temporary solution, to meet DEFRA requirements? (CHECK ONE.)	PA	*	*	*	*
	PR	2	1	2	1
	RI	3	5	3	1
	SC	3	5	2	1
1. [] Yes	SD	2	3	3	1
	TN	*	*	*	*
	TX	2	5	3	1
2. [] No--(SKIP TO QUESTION 8.)	UT	2	5	2	1
	VT	*	*	*	*
*No response - either omitted with no explanation or skipped according to questionnaire instructions.	VI	3	5	3	1
	VA	*	*	*	*
	WA	2	5	3	2
	WV	*	*	*	*
	WI	3	5	2	1
	WY	1	1	2	2

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question		
		6	7	8
6. To what extent, if any, will this diversion of resources from the development of your state's ultimate system contribute to a delay in its eventual implementation? (CHECK ONE.)	AK	4	3	2
	AZ	*	*	1
	AR	*	*	2
	CA	*	*	1
1. [] To a very great extent	CO	3	2	1
	CT	3	1	1
2. [] To a great extent	DE	*	*	1
	DC	3	*	1
3. [] To a moderate extent	FL	*	*	2
	GA	*	*	1
4. [] To some extent	GU	2	1	1
	HI	*	*	1
5. [] To little or no extent --(SKIP TO QUESTION 8.)	ID	*	*	1
	IL	*	*	1
7. If your state did not have to take the measure of modifying an existing system, or implementing a temporary solution, solely to meet the 10/1/86 deadline, how much earlier do you estimate your state would be able to implement its ultimate system? (CHECK ONE.)	IN	*	*	2
	IA	*	*	2
	KS	3	1	2
	KY	*	*	1
	LA	*	*	1
	ME	2	4	1
	MD	3	1	1
1. [] less than 1 month earlier	MA	2	4	1
	MN	4	4	2
2. [] from 1 to less than 3 months earlier	MS	5	*	1
	MO	*	*	2
3. [] from 3 to less than 6 months earlier	MT	*	*	2
	NE	4	5	1
	NV	3	1	1
4. [] from 6 to less than 9 months earlier	NH	*	*	2
	NJ	2	5	1
	NM	*	*	2
5. [] from 9 to less than 12 months earlier	NY	3	4	1
	NC	*	*	1
	OH	1	6	1
6. [] 12 months earlier or more	OK	*	*	1
	OR	*	*	2
8. Beyond your current programming budget, will your state need additional funds to implement the DEFRA requirements within the required timeframe?	PA	*	*	1
	PR	3	*	1
	RI	3	3	1
	SC	5	*	1
1. [] Yes	SD	3	3	1
	TN	*	*	2
2. [] No--(SKIP TO QUESTION 11.)	TX	2	4	1
	UT	3	1	1
	VT	*	*	1
*No response - either omitted with no explanation or skipped according to questionnaire instructions.	VI	4	5	1
	VA	*	*	1
	WA	*	*	1
	WV	2	6	2
	WI	4	2	1
	WY	*	*	2

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question 10
10. Can these additional funds be obtained by 10/1/86? (CHECK ONE.)		
1. [] Definitely yes	AK	*
	AZ	2
	AR	*
2. [] Probably yes	CA	1
	CO	3
	CT	2
3. [] Probably no	DE	1
	DC	4
	FL	*
	GA	1
	GU	4
	HI	2
	ID	4
	IL	3
	IN	*
	IA	*
	KS	*
	KY	1
	LA	2
	ME	4
	MD	2
	MA	3
	MN	*
	MS	3
	MO	*
	MT	*
	NE	2
	NV	3
	NH	*
	NJ	2
	NM	*
	NY	3
	NC	2
	OH	2
	OK	2
	OR	*
	PA	3
	PR	3
	RI	2
	SC	2
	SD	3
	TN	*
	TX	3
	UT	2
	VT	2
	VI	3
	VA	2
	WA	4
	WV	*
	WI	1
	WY	*

*No response - either
omitted with no
explanation or
skipped according
to questionnaire
instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

II. INCOME AND ELIGIBILITY VERIFICATION SYSTEM PROFILE

11. In **SECTION A** enter the number of the statement below that best describes how your state met each DEBRA requirement as of 5/29/86.

1. The 5/29/86 deadline was waived by a federal agency until 10/1/86.
2. The requirement was met as of 5/29/86 using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system for the foreseeable future.
3. The requirement was met as of 5/29/86 using the state's existing system (with minimal, if any, modifications). This same system will be the state's operational system for the foreseeable future.
4. The requirement was met as of 5/29/86 using a newly developed system (whether or not it was based on an existing state system). This same system will be the state's operational system for the foreseeable future.

For each requirement for which your response in **SECTION A** is either statement "1" or "2", in **SECTION B** enter the number of the statement below that best describes how your state plans to fulfill each DEBRA requirement as of 10/1/86.

1. As of 10/1/86 the requirement will be met using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system in the foreseeable future.
2. As of 10/1/86 the requirement will be met using a system that will be the state's ultimate operational system for the foreseeable future.

In **SECTION C** indicate whether, currently, each provision is fully, partially, or not yet implemented in your state. (CHECK ONE BOX FOR EACH PROVISION.)

In **SECTION D** indicate whether your state believes the cost (in terms of start up and operation dollars, time and human effort) expended to implement each provision is worth the potential benefit (in terms of program dollars saved.) (CHECK ONE BOX FOR EACH PROVISION. DO NOT RESPOND IN SHADED BOXES.)

	SECTION A	SECTION B	SECTION C			SECTION D		
	HOW STATE MET RE- QUIREMENT AS OF 5/29/86?	HOW STATE WILL MEET REQUIREMENT AS OF 10/1/86?	CURRENT IMPLEMENTATION?			COST VS. BENEFIT?		
			FULL	PAR-	NONE	COST	COST	BENEFIT
				TIAL		EXCEEDS	EQUALS	EXCEEDS
						BENEFIT	BENEFIT	COST
			1	2	3	4	5	6
1. Use standard record formats								
2. Obtain and verify program applicants' and family members' SSN								
3. Validate program applicants'/reci- pents' SSN with SSA Third Party Query, Bendax, or Enumera- tion/validation system								
4. Obtain and use state wage data for in- come/eligibility verification								

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

STATE	Question															
	11.1A	11.1B	11.1C	11.1D	11.2A	11.2B	11.2C	11.2D	11.3A	11.3B	11.3C	11.3D	11.4A	11.4B	11.4C	11.4D
AK	3	*	1	6	3	*	1	6	3	*	2	6	3	*	2	5
AZ	1	1	2	5	1	1	2	6	1	1	2	6	2	1	1	6
AR	1	2	3	5	1	2	2	5	1	2	2	6	3	*	1	6
CA	1	2	3	5	1	2	3	5	1	2	2	5	1	2	2	4
CO	1	1	2	5	1	1	2	6	1	1	2	5	3	*	1	5
CT	1	1	2	5	1	1	2	6	2	1	1	6	2	1	2	6
DE	1	2	2	6	3	*	1	6	2	2	2	6	3	*	1	6
DC	2	1	2	4	2	1	2	*	2	1	2	*	3	*	1	6
FL	1	1	3	4	1	1	2	5	1	1	2	4	3	*	1	6
GA	1	2	3	4	3	*	1	6	3	*	2	6	3	*	1	6
GU	1	1	3	6	1	1	1	6	1	1	2	6	*	*	*	*
HI	1	1	2	5	1	1	2	5	1	1	2	5	*	*	*	*
ID	1	2	2	4	1	2	1	4	1	2	1	4	1	2	1	4
IL	1	2	2	*	1	2	2	*	1	2	2	*	1	2	2	6
IN	2	1	2	6	2	1	1	6	2	1	2	5	2	1	1	6
IA	1	2	3	4	1	2	2	5	1	2	2	5	1	2	2	6
KS	2	1	1	5	1	1	2	5	1	1	2	4	1	1	2	6
KY	1	1	3	5	1	1	3	5	1	1	2	5	2	1	2	5
LA	1	2	3	5	2	2	2	5	1	2	2	5	1	2	2	6
ME	2	1	2	5	3	*	1	5	3	*	2	5	3	*	1	4
MD	1	1	3	6	2	1	2	6	1	1	2	6	2	1	2	6
MA	1	1	3	4	1	1	2	5	1	1	2	5	1	1	2	4
MN	1	1	3	4	3	*	1	5	2	2	2	4	1	1	2	4
MS	2	1	2	*	2	1	2	*	2	1	2	*	2	1	2	*
MO	3	*	1	4	3	*	1	6	3	*	1	6	3	*	2	5
MT	1	2	3	6	1	2	2	5	1	2	2	5	1	2	1	6
NE	2	2	2	5	2	2	2	5	3	*	1	5	*	*	*	*
NV	1	1	2	6	1	1	2	6	1	1	2	6	1	1	2	6
NH	3	*	2	*	1	2	2	*	1	2	2	*	3	*	1	*
NJ	1	1	1	4	1	1	1	6	1	1	2	5	1	1	1	6
NM	2	1	1	6	2	1	1	6	2	1	1	6	2	1	1	6
NY	*	*	3	*	3	*	1	6	1	2	3	6	2	1	2	6
NC	1	1	3	5	1	2	2	5	1	2	2	5	1	1	2	4
OH	1	1	1	4	1	1	2	4	1	1	2	4	*	*	*	*
OK	1	2	3	4	3	*	1	5	3	*	1	5	1	2	2	6
OR	*	*	3	*	2	2	2	*	2	2	2	*	2	2	2	*
PA	1	2	3	5	3	*	1	6	3	*	1	6	3	*	1	6
PR	1	2	3	6	1	2	3	6	1	2	3	6	1	2	2	5
RI	1	1	3	4	1	1	2	5	1	1	2	6	*	*	*	*
SC	1	1	2	5	3	*	2	*	2	1	2	*	3	*	2	*
SD	1	1	2	4	1	1	2	4	1	1	2	4	1	1	2	4
TN	1	2	*	*	3	*	1	6	3	*	1	5	3	*	1	6
TX	1	1	2	4	1	1	2	5	3	*	1	5	2	1	2	4
UT	1	1	2	5	1	1	2	4	1	1	2	6	1	1	2	6
VT	3	*	2	4	1	2	2	5	1	2	2	5	*	*	*	*
VI	1	1	2	*	1	1	2	*	1	1	3	*	1	1	2	*
VA	3	*	2	5	1	1	3	4	1	1	2	4	1	1	2	4
WA	1	1	3	4	1	1	3	6	1	1	3	6	3	*	2	6
WV	1	2	2	5	1	2	1	5	1	2	3	5	1	1	2	4
WI	2	2	2	6	3	*	1	6	1	2	2	6	*	*	*	*
WY	*	*	*	*	3	*	1	6	1	2	2	*	3	*	1	6

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

In SECTION A enter the number of the statement below that best describes how your state met each DEFRA requirement as of 5/29/86.

1. The 5/29/86 deadline was waived by a federal agency until 10/1/86.
2. The requirement was met as of 5/29/86 using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system for the foreseeable future.
3. The requirement was met as of 5/29/86 using the state's existing system (with minimal, if any, modifications). This same system will be the state's operational system for the foreseeable future.
4. The requirement was met as of 5/29/86 using a newly developed system (whether or not it was based on an existing state system). This same system will be the state's operational system for the foreseeable future.

For each requirement for which your response in SECTION A is either statement "1" or "2", in SECTION B enter the number of the statement below that best describes how your state plans to fulfill each DEFRA requirement as of 10/1/86.

1. As of 10/1/86 the requirement will be met using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system in the foreseeable future.
2. As of 10/1/86 the requirement will be met using a system that will be the state's ultimate operational system for the foreseeable future.

In SECTION C indicate whether, currently, each provision is fully, partially, or not yet implemented in your state. (CHECK ONE BOX FOR EACH PROVISION.)

In SECTION D indicate whether your state believes the cost (in terms of start up and operation dollars, time and human effort) expended to implement each provision is worth the potential benefit (in terms of program dollars saved.) (CHECK ONE BOX FOR EACH PROVISION. DO NOT RESPOND IN SHADED BOXES.)

	SECTION A HOW STATE MET RE- QUIREMENT AS OF 5/29/86?	SECTION B HOW STATE WILL MEET REQUIREMENT AS OF 10/1/86?	SECTION C CURRENT IMPLEMENTATION?	SECTION D COST VS. BENEFIT?
			FULL PAR- NONE TIAL 1 2 3	COST COST BENEFIT EXCEEDS EQUALS EXCEEDS BENEFIT BENEFIT COST 4 5 6
5. Exchange data between needs-based programs within your state				
6. Exchange wage and needs-based program data with other states				
7. Obtain and use IRS tax data for income/eligibility verification				
8. Obtain and use SSA tax (wage, private pension & self-employment) data for income/eligibility verification				

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

STATE	Question															
	11.5A	11.5B	11.5C	11.5D	11.6A	11.6B	11.6C	11.6D	11.7A	11.7B	11.7C	11.7D	11.8A	11.8B	11.8C	11.8D
AK	3	*	1	6	2	1	3	4	1	1	3	4	3	*	2	5
AZ	2	1	1	6	*	*	*	*	1	1	3	4	1	1	3	4
AR	1	1	2	6	1	1	2	5	1	2	2	4	1	1	2	4
CA	1	2	2	5	1	2	2	5	1	2	3	4	1	2	3	4
CO	1	1	2	6	1	1	3	5	1	2	2	4	1	1	3	5
CT	2	1	2	6	1	1	3	4	1	1	3	4	1	1	3	6
DE	3	*	1	6	2	2	2	4	1	2	2	4	1	2	2	4
DC	*	*	3	4	2	2	*	6	1	1	3	*	1	1	2	*
FL	2	1	1	6	2	1	2	6	1	1	3	4	1	1	3	4
GA	3	*	1	6	1	2	3	4	1	2	3	5	1	2	3	4
GU	1	1	2	5	1	1	3	4	1	1	3	4	1	1	3	4
HI	3	*	1	6	*	*	*	*	1	1	3	5	1	1	2	5
ID	1	2	1	4	1	2	3	4	1	2	3	4	1	2	3	4
IL	3	*	2	6	4	*	2	*	1	2	3	*	1	2	2	4
IN	2	1	1	5	2	1	2	4	1	1	2	6	2	1	2	4
IA	1	2	2	6	1	2	2	5	1	2	3	4	1	2	3	4
KS	3	*	1	6	3	*	2	5	1	1	3	6	1	1	3	4
KY	1	1	2	5	1	1	3	4	1	1	3	4	1	1	3	4
LA	3	*	1	5	1	2	3	4	1	2	3	4	1	2	3	4
ME	1	1	2	6	1	1	3	4	1	1	3	4	2	1	2	5
MD	2	1	2	6	2	1	2	5	1	1	3	5	1	1	3	4
MA	1	1	2	4	1	1	3	4	1	1	3	4	1	1	2	4
MN	1	1	3	4	1	1	3	4	1	1	3	4	1	1	2	4
MS	2	1	2	*	2	1	3	*	1	1	2	*	1	1	2	*
MO	3	*	1	6	3	*	2	4	1	2	2	4	1	2	2	4
MT	3	*	1	6	1	2	3	6	1	2	2	6	1	2	2	6
NE	2	1	2	6	2	1	2	4	1	1	3	5	2	1	2	4
NV	1	1	2	6	1	1	2	6	1	1	3	4	1	1	3	6
NH	3	*	1	*	*	*	*	*	1	2	3	*	1	2	3	*
NJ	1	1	1	6	2	1	2	5	1	1	3	5	1	1	3	4
NM	2	1	1	6	1	1	3	4	1	1	3	4	1	1	3	4
NY	3	*	1	6	*	*	*	*	1	1	3	5	1	1	3	5
NC	1	1	2	5	1	1	2	5	1	2	3	4	1	1	2	4
ND	2	1	2	4	1	1	3	4	1	1	3	4	2	1	2	4
OK	3	*	1	6	1	2	2	4	1	2	3	5	1	2	2	4
OR	2	2	2	*	2	2	2	*	*	*	3	*	*	*	3	*
PA	3	*	1	6	3	*	1	6	1	2	3	6	1	2	3	6
PR	1	2	2	5	1	2	3	4	1	2	3	4	1	2	3	6
RI	2	1	2	4	1	1	3	4	1	1	3	6	1	1	2	6
SC	1	1	2	6	1	1	2	5	1	1	3	4	1	1	3	4
SD	1	1	1	4	1	1	3	4	1	1	3	4	1	1	2	4
TN	3	*	1	6	3	*	1	5	1	2	2	4	1	2	3	4
TX	1	1	2	5	1	1	3	5	1	1	3	5	2	1	2	5
UT	2	1	1	6	*	*	3	*	1	1	3	*	1	1	2	4
VT	3	*	2	6	3	*	2	5	1	2	3	4	3	*	1	4
VI	1	1	3	*	*	*	*	*	1	1	3	*	1	1	3	*
VA	1	1	2	4	1	1	2	4	1	1	3	4	1	1	2	4
WA	2	1	1	6	1	1	3	6	1	1	3	4	1	1	3	4
WV	1	2	2	4	1	1	2	4	1	1	3	4	1	1	3	4
WI	3	*	1	6	2	2	2	6	1	2	3	5	2	2	1	4
WY	3	*	1	*	*	*	*	*	1	2	3	*	1	2	3	*

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

STATE	Question											
	11.9A	11.9B	11.9C	11.10A	11.10B	11.10C	11.11A	11.11B	11.11C	11.12A	11.12B	11.12C
AK	1	1	3	3	*	1	3	*	1	3	*	1
AZ	1	1	3	1	1	3	3	*	1	*	*	*
AR	1	2	2	1	1	2	3	*	1	1	2	2
CA	1	2	3	1	2	2	1	2	1	1	2	2
CO	1	2	3	1	2	3	2	2	1	1	2	3
CT	1	1	3	1	1	3	2	1	1	1	1	3
DE	1	2	2	1	2	2	3	*	1	3	*	1
DC	1	2	3	1	2	3	1	2	2	1	2	2
FL	1	1	3	1	1	3	3	*	1	3	*	1
GA	1	2	3	1	2	3	3	*	1	1	2	3
GU	1	1	3	1	1	2	1	1	3	1	1	3
HI	1	1	2	1	1	2	1	1	2	1	1	2
ID	1	2	3	1	2	2	1	2	1	1	2	1
IL	1	2	3	1	2	2	3	*	2	3	*	2
IN	1	1	2	2	1	1	2	1	1	2	1	1
IA	1	2	3	1	2	3	2	2	1	2	2	1
KS	1	1	3	1	1	3	2	1	2	2	1	2
KY	1	1	3	1	1	3	2	1	1	2	1	1
LA	1	2	3	1	2	3	3	*	1	1	2	3
ME	2	1	2	2	1	2	3	*	1	2	1	2
MD	1	1	3	1	1	3	3	*	1	3	*	1
MA	1	1	2	1	1	2	1	1	2	1	1	3
MN	1	2	3	1	2	3	3	*	1	3	*	1
MS	1	1	3	2	1	1	2	1	1	2	1	1
MO	3	*	2	3	*	2	3	*	2	3	*	2
MT	1	2	2	1	2	2	3	*	1	1	2	2
NE	1	1	3	2	1	2	4	*	2	2	1	3
NV	1	1	3	1	1	3	2	1	2	2	1	2
NH	1	2	2	3	*	1	3	*	1	*	*	*
NJ	1	1	3	1	1	3	3	*	1	3	*	1
NM	1	1	3	1	1	3	3	*	1	3	*	1
NY	1	1	3	1	1	3	3	*	1	3	*	1
NC	1	2	3	3	*	1	2	2	2	2	2	2
ND	3	*	1	3	*	1	3	*	1	3	*	1
OH	1	2	2	3	*	1	3	*	1	3	*	1
OR	*	*	3	*	*	3	*	*	3	2	2	2
PA	1	2	3	1	2	3	3	*	1	3	*	1
PR	1	2	3	1	2	2	1	2	2	1	2	2
RI	1	1	3	1	1	3	1	1	3	1	1	3
SC	1	1	3	1	1	3	3	*	1	3	*	1
SD	1	1	3	1	1	2	1	1	2	1	1	2
TN	1	2	3	3	*	1	3	*	1	3	*	1
TX	1	1	3	1	1	2	1	1	2	1	1	3
UT	1	1	3	2	1	1	2	1	1	2	1	1
VT	1	2	2	3	*	1	3	*	1	3	*	1
VI	1	1	3	1	1	3	1	1	3	1	1	3
VA	1	1	3	3	*	1	3	*	1	1	1	2
WA	1	1	2	1	1	2	2	1	2	2	1	2
WV	1	2	3	1	2	3	1	2	2	1	2	2
WI	*	*	3	2	2	1	3	*	1	3	*	1
WY	1	2	3	1	2	3	3	*	1	*	*	*

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

In **SECTION A** enter the number of the statement below that best describes how your state met each DEFRA requirement as of 5/29/86.

1. The 5/29/86 deadline was waived by a federal agency until 10/1/86.
2. The requirement was met as of 5/29/86 using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system for the foreseeable future.
3. The requirement was met as of 5/29/86 using the state's existing system (with minimal, if any, modifications). This same system will be the state's operational system for the foreseeable future.
4. The requirement was met as of 5/29/86 using a newly developed system (whether or not it was based on an existing state system). This same system will be the state's operational system for the foreseeable future.

For each requirement for which your response in **SECTION A** is either statement "1" or "2", in **SECTION B** enter the number of the statement below that best describes how your state plans to fulfill each DEFRA requirement as of 10/1/86.

1. As of 10/1/86 the requirement will be met using an interim or temporary system. Another system is planned or under development that will ultimately become the state's operational system in the foreseeable future.
2. As of 10/1/86 the requirement will be met using a system that will be the state's ultimate operational system for the foreseeable future.

In **SECTION C** indicate whether, currently, each provision is fully, partially, or not yet implemented in your state. (CHECK ONE BOX FOR EACH PROVISION.)

In **SECTION D** indicate whether your state believes the cost (in terms of start up and operation dollars, time and human effort) expended to implement each provision is worth the potential benefit (in terms of program dollars saved.) (CHECK ONE BOX FOR EACH PROVISION. DO NOT RESPOND IN SHADED BOXES.)

	SECTION A HOW STATE MET RE- QUIREMENT AS OF 5/29/86?		SECTION B HOW STATE WILL MEET REQUIREMENT AS OF 10/1/86?			SECTION C CURRENT IMPLEMENTATION?			SECTION D COST VS. BENEFIT?		
						FULL	PAR-	NONE	COST	COST	BENEFIT
						EXCEEDS	EQUALS	EXCEEDS	BENEFIT	BENEFIT	COST
						1	2	3	4	5	6
13. Take appropriate action on cases identified by IRS or SSA tax data within 30 days											
14. Track record volume and report annually											
15. Track case disposition and report annually											

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

STATE	Question											
	11.13A	11.13B	11.13C	11.13D	11.14A	11.14B	11.14C	11.14D	11.15A	11.15B	11.15C	11.15D
AK	1	2	3	4	1	2	3	4	1	2	3	4
AZ	1	1	3	4	1	1	3	4	1	1	3	4
AR	1	2	2	4	1	2	2	4	1	2	2	4
CA	1	2	3	4	1	2	2	4	1	2	2	4
CO	1	2	3	4	1	1	3	4	1	1	3	4
CT	1	1	3	4	1	1	3	4	1	1	3	4
DE	1	2	2	6	1	2	2	4	1	2	2	4
DC	1	2	3	4	1	2	3	4	1	2	3	4
FL	1	1	3	4	1	1	2	4	1	1	2	4
GA	1	2	3	4	1	2	3	4	1	2	3	4
GU	1	1	3	5	1	1	3	5	1	1	3	5
HI	1	1	2	5	1	1	2	5	1	1	2	5
ID	1	2	3	4	1	2	3	4	1	2	3	4
IL	1	2	2	4	1	2	2	6	1	2	2	6
IN	1	1	2	6	1	1	2	4	1	1	2	4
IA	1	2	3	6	1	2	3	6	1	2	3	6
KS	1	1	3	4	1	1	3	5	1	1	3	4
KY	1	1	3	4	1	1	3	4	1	1	3	4
LA	1	2	3	4	1	2	3	5	1	2	3	5
ME	2	1	2	4	2	1	2	4	2	1	2	4
MD	1	1	3	5	1	1	3	5	1	1	3	4
MA	1	1	3	4	1	1	3	5	1	1	3	5
MN	1	1	3	4	1	1	3	4	1	1	3	4
MS	1	1	3	*	1	1	3	*	1	1	3	*
MO	1	2	3	4	1	1	3	4	1	1	3	4
MT	1	2	2	6	1	2	2	5	1	2	2	4
NE	1	1	3	4	1	1	2	5	1	1	3	5
NV	1	1	3	4	1	1	3	4	1	1	3	4
NH	1	2	3	*	1	2	3	*	1	2	3	*
NJ	1	1	3	4	1	1	3	6	1	1	3	6
NM	1	1	3	5	1	1	3	4	1	1	3	4
NY	1	1	3	4	1	1	2	4	1	1	2	4
NC	1	2	3	4	1	2	2	4	1	2	2	4
OH	1	1	2	4	1	1	2	4	1	1	2	4
OK	1	2	3	5	1	2	2	4	1	2	2	4
OR	*	*	3	*	*	*	3	*	*	*	3	*
PA	1	2	3	6	1	2	3	6	1	2	3	6
PR	1	2	3	6	1	2	3	5	1	2	3	5
RI	1	1	3	4	1	1	3	4	1	1	3	4
SC	1	1	3	4	1	1	2	5	1	1	3	5
SD	1	1	3	4	1	1	3	4	1	1	3	4
TN	1	2	2	4	1	2	3	4	1	2	3	4
TX	1	1	2	5	1	2	3	4	1	1	3	4
UT	1	1	3	*	1	1	3	*	1	1	3	*
VT	1	2	2	4	1	2	3	4	1	2	3	4
VI	1	1	3	*	1	1	3	*	1	1	3	*
VA	1	1	3	4	1	1	3	4	1	1	3	4
WA	1	1	3	4	1	1	3	5	1	1	3	4
WV	1	1	3	4	1	1	3	4	1	1	3	4
WI	1	2	3	4	1	2	3	5	1	1	3	4
WY	1	2	3	*	3	*	*	*	3	*	1	*

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question		
		12	13	14
12. A coordinating agency or agencies will be needed in each state to handle data exchanges with the IRS Information Returns Processing (IRP) system and the SSA Bendex system. Please indicate how your state will be structured to accomplish this. (CHECK ONE.)	AK	1	1	2
	AZ	1	1	1
	AR	1	2	*
	CA	2	2	*
	CO	1	2	*
1. [] a single agency will be responsible for coordinating your state's data exchanges with both SSA and IRS systems	CT	1	1	2
	DE	1	2	*
	DC	1	2	*
	FL	1	2	*
2. [] separate agencies will be responsible for coordinating your state's data exchanges with SSA and IRS systems	GA	2	2	*
	GU	1	1	1
	HI	1	2	*
	ID	1	2	*
	IL	1	1	2
Questions 13 through 19 refer to the functions of this coordinating agency (or agencies if IRS and SSA data are each handled by a separate agency). Answer them in regard to how it (or they) will be functioning as of 10/1/86.	IN	1	2	*
	IA	1	1	2
	KS	1	2	*
	KY	1	1	2
	LA	1	2	*
	ME	1	1	2
	MD	1	2	*
13. Indicate whether or not your state coordinating agency will screen IRS output files to eliminate cases in which data shows accurate income was reported by applicant/recipient.	MA	1	1	2
	MN	1	1	2
	MS	2	1	2
	MO	1	2	*
1. [] Yes--(CONTINUE.)	MT	1	2	*
	NE	1	1	2
2. [] No---(SKIP TO QUESTION 16.)	NV	1	2	*
	NH	1	1	2
	NJ	1	1	2
In questions 14 and 15 "case followup" refers to determination of differences between applicant/recipient-provided data and IEVS data through record comparisons; verification with applicant/recipient or third party where differences do exist; and case investigation and fraud referral where warranted.	NM	1	1	2
	NY	1	2	*
	NC	1	2	*
	OH	1	1	2
	OK	1	2	*
	OR	1	*	*
	PA	1	2	*
14. Will your state coordinating agency perform IRS case followup independent of counties, user agencies, or caseworkers in your state?	PR	1	2	*
	RI	1	1	2
	SC	1	2	*
	SD	1	1	1
1. [] Yes--(SKIP TO QUESTION 16.)	TN	1	2	*
	TX	1	1	1
2. [] No--(CONTINUE.)	UT	2	2	*
	VT	1	1	2
*No response - either omitted with no explanation or skipped according to questionnaire instructions.	VI	1	1	2
	VA	1	1	2
	WA	1	2	*
	WV	1	2	*
	WI	1	1	2
	WY	1	2	*

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question	
		16	17
16. Indicate whether or not your state coordinating agency will screen SSA output files to eliminate cases in which data shows accurate income was reported by applicant/recipient.	AK	1	2
	AZ	2	*
	AR	1	1
	CA	2	*
1. [] Yes-- X (CONTINUE.)	CO	2	*
	CT	1	2
2. [] No--- X (SKIP TO QUESTION 18.)	DE	1	2
	DC	2	*
	FL	1	2
17. Will your state coordinating agency perform SSA case followup independent of counties, user agencies, or caseworkers in your state?	GA	2	*
	GU	1	1
	HI	1	2
	ID	2	*
1. [] Yes-- X (SKIP TO QUESTION 19.)	IL	1	2
	IN	2	*
2. [] No--- X (CONTINUE.)	IA	1	2
	KS	2	*
	KY	1	2
	LA	1	2
	ME	1	2
	MD	2	*
	MA	1	2
	MN	1	2
	MS	1	2
	MO	2	*
	MT	2	*
	NE	1	2
	NV	2	*
	NH	1	2
	NJ	1	2
	NM	1	2
	NY	2	*
	NC	2	*
	OH	2	*
	OK	1	2
	OR	*	*
	PA	2	*
	PR	2	*
	RI	1	2
	SC	2	*
	SD	1	1
	TN	2	*
	TX	1	1
	UT	2	*
	VT	1	2
	VI	1	2
	VA	1	2
	WA	2	*
	WV	2	*
	WI	1	2
	WY	2	*

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

III. USE OF SOCIAL SECURITY NUMBERS	STATE	Question		
		19.1	19.2	19.3
19. Indicate whether or not your state currently requires applicants and family members to provide their social security numbers (SSNs) to each of the programs listed below. (CHECK ONE BOX FOR EACH PROGRAM.)	AK	2	2	1
	AZ	2	2	2
	AR	2	2	2
	CA	2	2	2
	CO	2	2	2
	CT	2	2	2
	DE	2	2	2
	DC	2	2	2
	FL	1	2	2
	GA	2	2	2
	GU	2	2	2
	HI	2	2	2
	ID	2	2	2
	IL	2	2	2
	IN	2	2	2
	IA	2	2	2
	KS	1	1	1
	KY	2	2	2
	LA	2	2	2
	ME	2	2	2
	MD	2	2	2
	MA	3	2	2
	MN	2	2	2
	MS	2	2	2
	MO	2	2	2
	MT	2	2	2
	NE	1	1	1
	NV	2	2	2
	NH	2	2	2
	NJ	2	2	2
	NM	2	2	2
	NY	2	2	2
	NC	1	1	1
	OH	2	2	2
	OK	1	2	2
	OR	*	*	*
	PA	2	2	2
	PR	2	2	2
	RI	2	2	2
	SC	2	2	2
	SD	2	2	2
	TN	2	2	2
	TX	2	2	2
	UT	2	2	2
	VT	3	2	2
	VI	2	2	2
	VA	2	2	2
	WA	2	2	2
	WV	2	2	2
	WI	2	2	2
	WY	1	2	2

STATE REQUIRES SSN FROM...	APPLI- CANTS ONLY	BOTH APPLI- CANTS AND FAMILY	NEITHER APPLI- CANTS NOR FAMILY
	1	2	3
1. Medicaid			
2. Aid to Families with Dependent Children (AFDC)			
3. Food Stamps			

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

20. How does the cost (in terms of dollars, time, and human effort) of each of the following initiatives compare to its potential benefit (in terms of program dollars saved)? (CHECK ONE BOX FOR EACH ROW.)	STATE	Question	
		20.1	20.2
	AK	2	2
	AZ	3	2
	AR	2	2
	CA	2	2
	CO	1	1
	CT	3	3
	DE	2	2
	DC	2	2
	FL	2	2
	GA	2	2
	GU	1	1
	HI	2	2
	ID	1	1
	IL	3	3
	IN	3	3
	IA	3	3
	KS	2	2
	KY	2	2
	LA	2	2
	ME	1	1
	MD	2	3
	MA	1	2
	MN	*	*
	MS	*	*
	MO	3	3
	MT	3	3
	NE	2	2
	NV	3	3
	NH	*	*
	NJ	2	2
	NM	2	2
	NY	2	3
	NC	1	1
	OH	1	1
	OK	2	2
	OR	*	*
	PA	3	3
	PR	3	3
	RI	2	2
	SC	2	2
	SD	1	1
	TN	2	2
	TX	2	3
	UT	2	2
	VT	2	2
	VI	*	*
	VA	1	1
	WA	3	3
	WV	2	2
	WI	*	*
	WY	*	*

	COST EXCEEDS	COST EQUALS	BENE- FIT
	BENE- FIT	BENE- FIT	EXCEEDS COST
	1	2	3
1. Modify existing application forms to facilitate SSN verification			
2. Case worker training to implement SSN verification			

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question		
		21	22	23
21. Which SSA system does your state most often use to validate a program recipient's SSN? (CHECK ONE.)	AK	3	6	2
1. [] Third party query system	AZ	3	6	1
2. [] Bendex system	AR	3	6	2
3. [] Enumeration/validation system	CA	3	6	3
	CO	3	6	2
	CT	3	5	2
	DE	2	4	1
22. About how long, on average, does it take SSA to answer your state's requests for SSN validation with the system your state most often uses? (CHECK ONE.)	DC	3	6	2
1. [] Less than 1 day	FL	3	7	3
2. [] 1 day to less than 1 week	GA	3	7	3
3. [] 1 week to less than 2 weeks	GU	2	6	2
4. [] 2 weeks to less than 3 weeks	HI	2	6	2
5. [] 3 weeks to less than 4 weeks	ID	3	5	3
6. [] 4 weeks or more	IL	3	6	2
7. [] Can't determine--very little experience with SSA	IN	3	4	2
	IA	3	4	2
	KS	3	6	2
	KY	3	6	3
	LA	3	6	1
	ME	2	6	2
	MD	2	6	2
	MA	3	6	3
	MN	3	6	2
	MS	3	6	*
	MO	3	6	2
	MT	3	6	2
	NE	3	6	2
	NV	3	6	1
	NH	3	6	1
	NJ	3	7	3
	NM	3	6	2
	NY	3	*	*
	NC	3	6	2
	OH	2	6	3
	OK	3	5	2
	OR	2	6	1
	PA	3	5	2
	PR	2	6	2
	RI	3	6	1
	SC	3	6	2
	SD	3	5	2
	TN	1	4	2
	TX	3	6	2
	UT	1	2	1
	VT	3	6	2
	VI	1	4	1
	VA	3	7	2
	WA	2	7	*
	WV	3	5	2
	WI	3	6	2
	WY	2	5	2
*No response - either omitted with no explanation or skipped according to questionnaire instructions.				

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

IV. STATE WAGE REPORTING	STATE	Question		
		24	25	26
24. Is your state currently a wage reporting state?	AK	1	*	*
	AZ	1	*	*
1. [] Yes -> (SKIP TO QUESTION 31.)	AR	1	*	*
	CA	1	*	*
2. [] No	CO	1	*	*
	CT	1	*	*
25. Which of the statements listed below best describes how your state will fulfill the DEFRA requirement to collect and record state wage data? (CHECK ONE.)	DE	1	*	*
	DC	1	*	*
	FL	1	*	*
1. [] adopt or create an entirely new system	GA	1	*	*
	GU	2	3	2
	HI	2	2	1
2. [] totally or almost totally redesign an existing state system	ID	1	*	*
	IL	1	*	*
	IN	1	*	*
3. [] make moderate changes to an existing state system	IA	1	*	*
	KS	1	*	*
	KY	1	*	*
	LA	1	*	*
4. [] make minimal changes to an existing state system	ME	1	*	*
	MD	1	*	*
	MA	1	*	*
26. Will this system also be used for unemployment compensation purposes?	MN	1	*	*
	MS	1	*	*
1. [] Yes	MO	1	*	*
	MT	1	*	*
2. [] No	NE	2	1	1
	NV	1	*	*
	NH	1	*	*
	NJ	1	*	*
	NM	1	*	*
	NY	1	*	*
	NC	1	*	*
	OH	2	1	1
	OK	1	*	*
	OR	1	*	*
	PA	1	*	*
	PR	1	*	*
	RI	2	2	1
	SC	1	*	*
	SD	1	*	*
	TN	1	*	*
	TX	1	*	*
	UT	1	*	*
	VT	2	1	2
*No response - either omitted with no explanation or skipped according to questionnaire instructions.	VI	1	*	*
	VA	1	*	*
	WA	1	*	*
	WV	1	*	*
	WI	2	1	1
	WY	1	*	*

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question			
		27	28	29	30
27. Indicate whether your state believes the start up and operating costs to collect and record state wage data will exceed, equal, or fall short of the potential benefit (in terms of program dollars saved). (CHECK ONE.)					
1. [] cost exceeds benefit	AK	*	*	*	*
	AZ	*	*	*	*
	AR	*	*	*	*
	CA	*	*	*	*
	CO	*	*	*	*
2. [] cost equals benefit	CT	*	*	*	*
	DE	*	*	*	*
3. [] cost falls short of benefit	DC	*	*	*	*
	FL	*	*	*	*
28. Will this system require changes in your state's laws?	GA	*	*	*	*
1. [] Yes	GU	1	1	1	2
	HI	2	2	1	1
2. [] No	ID	*	*	*	*
	IL	*	*	*	*
29. Will your state need special funding to start up and/or operate this system?	IN	*	*	*	*
1. [] Yes	IA	*	*	*	*
	KS	*	*	*	*
2. [] No	KY	*	*	*	*
	LA	*	*	*	*
30. Will your state begin quarterly wage reporting by 9/30/88? (CHECK ONE.)	ME	*	*	*	*
1. [] Definitely yes	MD	*	*	*	*
	MA	*	*	*	*
2. [] Probably yes	MN	*	*	*	*
	MS	*	*	*	*
3. [] Probably not	MO	*	*	*	*
	MT	*	*	*	*
4. [] Definitely not	NE	2	1	1	1
	NV	*	*	*	*
	NH	*	*	*	*
	NJ	*	*	*	*
	NM	*	*	*	*
	NY	*	*	*	*
	NC	*	*	*	*
	OH	3	1	1	1
	OK	*	*	*	*
	OR	*	*	*	*
	PA	*	*	*	*
	PR	*	*	*	*
	RI	*	1	1	2
	SC	*	*	*	*
	SD	*	*	*	*
	TN	*	*	*	*
	TX	*	*	*	*
	UT	*	*	*	*
	VT	3	1	1	1
	VI	*	*	*	*
	VA	*	*	*	*
	WA	*	*	*	*
	WV	*	*	*	*
	WI	1	1	1	1
	WY	*	*	*	*

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

Question

V. NEEDS-BASED AND WAGE DATA EXCHANGES WITHIN YOUR STATE

31. Listed below are the programs that must access and use state wage data. In each program, is this process currently automated or manual? (CHECK ONE BOX FOR EACH PROGRAM.)

STATE 31.1 31.2 31.3

	AUTOMATED --MOSTLY OFF-LINE	AUTOMATED --AS OFF-LINE AS ON-LINE	AUTOMATED --MOSTLY ON-LINE	MANUAL	NOT APPLICA- BLE-- STATE WAGE DATA NOT ACCESSED
	1	2	3	4	5
1. Medicaid					
2. AFDC					
3. Food Stamps					

AK	2	2	2
AZ	3	3	3
AR	3	3	3
CA	5	1	1
CO	4	4	4
CT	3	2	2
DE	3	3	3
DC	5	2	2
FL	1	1	1
GA	1	1	1
GU	5	5	5
HI	5	5	5
ID	1	1	1
IL	2	2	2
IN	1	1	1
IA	1	1	1
KS	2	2	2
KY	2	2	2
LA	5	1	1
ME	1	1	1
MD	3	3	3
MA	1	1	1
MN	1	1	1
MS	1	1	1
MO	2	2	2
MT	1	1	1
NE	5	5	5
NV	1	1	1
NH	1	1	1
NJ	3	3	3
NM	3	3	3
NY	1	1	1
NC	2	2	2
OH	5	5	5
OK	3	3	3
OR	1	1	1
PA	1	1	1
PR	*	1	4
RI	5	5	5
SC	5	2	3
SD	5	1	1
TN	3	3	3
TX	1	1	1
UT	1	1	1
VT	5	5	5
VI	5	1	1
VA	1	1	4
WA	4	1	1
WV	5	1	1
WI	5	5	5
WY	5	1	1

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

32. Currently, how compatible, if at all, is your state's automated wage reporting system with the systems of each of the programs listed below? (CHECK ONE BOX FOR EACH PROGRAM.)

	COMPATIBLE	SOMENHAT COMPATIBLE	INCOMPATIBLE
	1	2	3
1. Medicaid			
2. AFDC			
3. Food stamps			

STATE	Question		
	32.1	32.2	32.3
AK	1	1	1
AZ	1	1	1
AR	1	1	1
CA	2	2	2
CO	2	2	2
CT	2	2	2
DE	1	1	1
DC	2	1	1
FL	1	1	1
GA	2	2	2
GU	*	*	*
HI	*	*	*
ID	3	3	3
IL	1	1	1
IN	2	2	2
IA	1	1	1
KS	3	3	3
KY	1	1	1
LA	3	3	3
ME	2	2	2
MD	2	2	2
MA	1	1	1
MN	2	2	2
MS	2	2	2
MO	1	1	1
MT	1	1	1
NE	*	*	*
NV	1	1	1
NH	1	1	1
NJ	1	1	1
NM	1	1	1
NY	1	1	1
NC	1	1	1
OH	*	*	*
OK	1	1	1
OR	1	1	1
PA	1	1	1
PR	3	3	3
RI	*	*	*
SC	1	1	1
SD	3	3	3
TN	1	1	1
TX	2	2	2
UT	1	1	1
VT	*	*	*
VI	*	2	2
VA	1	1	1
WA	3	1	1
WV	2	2	2
WI	*	*	*
WY	*	1	1

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	<u>Question</u>				
	<u>STATE</u>	<u>33</u>	<u>34</u>	<u>35</u>	
<p>33. We would like to know how your state's privacy/confidentiality laws affect data exchanges, in general, in your state. Do your state's privacy/confidentiality laws facilitate, neither facilitate nor hinder, or hinder these exchanges, in general? (CHECK ONE.)</p> <p>1. [] greatly facilitate</p> <p>2. [] somewhat facilitate</p> <p>3. [] neither facilitate nor hinder</p> <p>4. [] somewhat hinder</p> <p>5. [] greatly hinder</p>	AK	2	1	*	
	AZ	3	1	*	
	AR	3	1	*	
	CA	3	2	4	
	CO	2	1	*	
	CT	4	1	*	
	DE	2	1	*	
	DC	3	1	*	
	FL	3	1	*	
	GA	4	2	4	
	GU	4	1	*	
	HI	2	1	*	
	ID	5	1	*	
	IL	3	1	*	
	IN	3	1	*	
	<p>34. Consider the Medicaid, AFDC, and Food Stamps programs in your state. Which of the statements below best describes how these programs are administered in your state? (CHECK ONE.)</p> <p>1. [] All three programs are administered by the same department --(SKIP TO QUESTION 36.)</p> <p>2. [] Two out of the three programs are administered by the same department</p> <p>3. [] Each of the three programs is administered by a different department</p>	IA	3	1	*
		KS	3	1	*
		KY	3	2	3
		LA	3	1	*
		ME	3	1	*
		MD	3	2	4
		MA	5	1	*
		MN	4	1	*
		MS	3	2	4
		MO	3	1	*
		MT	3	1	*
NE		3	1	*	
NV		3	1	*	
NH		3	1	*	
<p>35. Consider the fact that not all of these needs-based programs are administered by the same department in your state. Does this facilitate, neither facilitate nor hinder, or hinder data exchanges, in general, between these programs? (CHECK ONE.)</p> <p>1. [] greatly facilitates</p> <p>2. [] somewhat facilitates</p> <p>3. [] neither facilitates nor hinders</p> <p>4. [] somewhat hinders</p> <p>5. [] greatly hinders</p>		NJ	3	1	*
		NM	4	1	*
		NY	4	1	*
		NC	3	1	*
		OH	2	1	*
	OK	4	1	*	
	OR	3	1	*	
	PA	3	1	*	
	PR	1	2	5	
	RI	4	1	*	
	SC	2	2	3	
	SD	3	1	*	
	TN	3	1	*	
	TX	3	1	*	
	UT	3	1	*	
VT	4	1	*		
VI	3	2	4		
VA	3	2	3		
WA	3	1	*		
WV	2	1	*		
WI	2	1	*		
WY	3	1	*		

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

VI. DEFRA 30 DAY ACTION DEADLINE

36. Listed below are four procedures associated with handling the tax data provided to the states by IRS and SSA. We would like to know how, and at what level, each will be performed under the system your state will implement by 10/1/86.

In SECTION A indicate whether each procedure will be done manually or automatically. (CHECK ONE BOX FOR EACH PROCEDURE.)

In SECTION B indicate at what level each procedure will be performed in your state. (CHECK ONE BOX FOR EACH PROCEDURE.)

	SECTION A HOW PROCEDURE WILL BE PERFORMED			SECTION B LEVEL AT WHICH PROCEDURE WILL BE PERFORMED		
	MOST OFTEN MANUALLY	AS OFTEN AS AUTO-MATICALLY	MOST OFTEN AUTO-MATICALLY	MOST OFTEN AT THE ELIGIBILITY WORKER LEVEL	AS OFTEN AT THE ELIGIBILITY WORKER LEVEL AS ABOVE	MOST OFTEN ABOVE THE ELIGIBILITY WORKER LEVEL
	1	2	3	4	5	6
1. Screening to eliminate cases where client-provided and IRS data agree						
2. Screening to eliminate cases where client-provided and SSA data agree						
3. Third party validation of cases where client-provided and IRS data are discrepant						
4. Third party validation of cases where client-provided and SSA data are discrepant						

*No response - either omitted without explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

STATE	Question							
	36.1A	36.1B	36.2A	36.2B	36.3A	36.3B	36.4A	36.4B
AK	2	6	2	6	1	6	1	6
AZ	1	6	1	4	1	6	1	4
AR	1	4	3	6	1	4	1	4
CA	1	4	1	4	1	4	1	4
CO	1	4	1	4	1	4	1	4
CT	3	6	3	6	1	4	1	4
DE	1	6	3	6	1	6	1	6
DC	1	6	1	4	1	6	1	4
FL	2	4	2	4	2	4	2	4
GA	1	4	1	4	1	4	1	4
GU	3	6	3	6	1	4	1	4
HI	1	4	1	4	1	4	1	4
ID	1	4	1	4	1	5	1	5
IL	3	6	1	4	1	4	1	4
IN	1	4	1	4	1	4	1	4
IA	2	4	2	4	2	4	2	4
KS	1	4	1	4	1	4	1	4
KY	1	4	1	4	1	4	1	4
LA	1	4	2	5	1	4	1	4
ME	3	6	3	6	1	4	2	5
MD	1	4	1	4	1	4	1	4
MA	2	6	3	6	1	6	1	6
MN	3	6	3	6	1	4	1	4
MS	1	4	1	4	1	4	1	4
MO	1	4	1	4	1	4	1	4
MT	1	4	1	4	1	4	1	4
NE	3	6	2	5	1	4	1	4
NV	1	4	1	4	1	4	1	4
NH	2	5	2	4	1	4	1	4
NJ	1	4	2	4	1	4	1	4
NM	3	6	3	6	1	4	1	4
NY	1	4	1	4	1	4	1	4
NC	1	4	1	4	1	4	1	4
OH	1	4	1	4	1	4	1	4
OK	3	6	3	6	1	4	1	4
OR	*	*	*	*	*	*	*	*
PA	1	4	1	4	1	4	1	4
PR	1	4	1	4	1	4	1	4
RI	1	4	2	4	1	4	1	4
SC	1	4	1	4	1	4	1	4
SD	3	6	3	6	1	5	1	5
TN	1	4	1	4	1	4	1	4
TX	1	4	2	6	1	4	1	4
UT	1	4	1	4	1	4	1	4
VT	3	6	3	6	1	4	1	4
VI	1	4	1	4	1	4	1	4
VA	2	5	2	5	2	5	2	5
WA	1	4	1	4	1	4	1	4
WV	2	4	2	4	2	4	2	4
WI	1	4	1	4	1	4	1	4
WY	1	4	2	5	1	4	1	4

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question		
		37	38	39
37. Do you anticipate, initially, greater numbers of cases that require followup than you expect as the program progresses? (CHECK ONE.)				
1. <input type="checkbox"/> Definitely yes	AK	2	4	4
	AZ	2	3	3
	AR	2	2	2
	CA	1	4	4
	CO	1	2	3
	CT	1	3	4
	DE	2	3	3
	DC	2	3	3
	FL	2	3	4
	GA	2	2	4
	GU	1	3	3
	HI	1	2	4
	ID	2	4	4
	IL	1	1	2
	IN	1	1	2
	IA	1	4	4
	KS	2	4	3
	KY	2	2	2
	LA	1	4	3
	ME	3	*	*
	MD	1	3	4
	MA	1	5	4
	MN	1	1	3
	MS	2	5	4
	MO	1	2	2
	MT	2	3	3
	NE	1	3	3
	NV	1	3	3
	NH	1	*	4
	NJ	2	3	3
	NM	3	*	*
	NY	2	4	4
	NC	2	3	4
	OH	1	5	3
	OK	2	3	3
	OR	2	*	*
	PA	2	3	2
	PR	2	3	3
	RI	1	4	4
	SC	1	3	4
	SD	1	3	3
	TN	3	*	*
	TX	2	4	4
	UT	1	2	3
	VT	2	2	2
	VI	2	4	3
	VA	2	3	3
	WA	2	4	4
	WV	1	5	4
	WI	1	2	3
	WY	3	*	*
38. In approximately what proportion of the initial cases identified with federal data will your state realistically be able to take action within 30 days after receipt of this data? (CHECK ONE.)				
1. <input type="checkbox"/> 80-100%--all or almost all cases				
2. <input type="checkbox"/> 60-79%--most cases				
3. <input type="checkbox"/> 40-59%--about half the cases				
4. <input type="checkbox"/> 20-39%--some cases				
5. <input type="checkbox"/> 10-19%--few, if any, cases				
39. Will your state have enough staff on hand to follow up on and complete most of these initial cases within the 30 day timeframe? (CHECK ONE.)				
1. <input type="checkbox"/> Definitely yes->(SKIP TO QUESTION 43.)				
2. <input type="checkbox"/> Probably yes->(SKIP TO QUESTION 43.)				
3. <input type="checkbox"/> Probably no				
4. <input type="checkbox"/> Definitely no				
*No response - either omitted with no explanation or skipped according to questionnaire instructions.				

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question					
		40.1	40.2	40.3	40.4	40.5	40.6
40. Indicate whether or not your state is planning to deal with this staff shortage in each of the following ways. (CHECK ONE BOX IN EACH ROW.)							
		YES	NO				
		1	2				
1. Seek funding for additional staff	AK	2	1	1	1	2	0
	AZ	2	2	1	1	2	0
	AR	*	*	*	*	*	*
	CA	1	2	1	1	2	0
	CO	1	2	1	1	2	0
	CT	1	1	1	1	2	0
	DE	2	1	2	2	2	0
	DC	2	2	1	1	2	0
	FL	1	2	2	1	2	0
2. Divert staff from other functions	GA	2	1	1	1	2	0
	GU	1	1	1	1	2	0
	HI	1	2	1	2	2	0
3. Make your best effort to meet 30 day deadline with staff on hand	ID	2	2	1	1	2	0
	IL	*	*	*	*	*	*
	IN	*	*	*	*	*	*
4. Prioritize cases	IA	1	1	1	1	2	0
	KS	2	1	1	1	2	0
	KY	*	*	*	*	*	*
6. Other (SPECIFY.)	LA	2	2	1	1	2	0
	ME	*	*	*	*	*	*
	MD	1	2	1	1	2	0
	MA	1	1	2	1	2	0
	MN	2	2	1	1	2	0
	MS	2	2	1	1	2	1
	MO	*	*	*	*	*	*
	MT	2	2	1	2	2	0
	NE	1	2	1	1	2	0
	NV	2	2	1	2	2	0
	NH	2	2	1	1	2	0
	NJ	2	2	1	1	2	0
	NM	*	*	*	*	*	*
	NY	1	1	1	1	2	0
	NC	2	2	1	2	2	0
	OH	1	1	1	1	2	0
	OK	2	2	1	1	2	0
	OR	*	*	*	*	*	*
	PA	*	*	*	*	*	*
	PR	1	2	2	1	2	0
	RI	2	2	1	2	2	0
	SC	2	2	1	1	2	0
	SD	2	2	1	1	2	0
	TN	*	*	*	*	*	*
	TX	2	2	1	1	2	0
	UT	2	1	1	1	2	0
	VT	*	*	*	*	*	*
	VI	1	2	1	1	2	0
	VA	*	*	*	*	*	*
	WA	1	1	1	1	2	0
	WV	2	1	1	1	2	0
	WI	2	1	1	1	2	0
	WY	*	*	*	*	*	*

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

41. According to your state's due process laws, how many days is each type of program recipient listed below given to respond to an adverse action notice? (ENTER NUMBER FOR EACH TYPE OF RECIPIENT.)	STATE	Question		
		41.1	41.2	41.3
	AK	10	10	10
	AZ	10	10	10
	AR	10	10	10
	CA	10	10	10
	CO	10	10	10
	CT	10	10	10
	DE	10	10	10
	DC	15	15	15
	FL	10	10	10
	GA	10	10	10
	GU	10	10	10
	HI	10	10	10
	ID	60	60	60
	IL	10	10	10
	IN	16	16	16
	IA	10	10	10
	KS	10	10	10
	KY	40	40	90
	LA	10	10	10
	ME	10	10	10
	MD	10	10	10
	MA	14	14	14
	MN	10	10	10
	MS	10	10	10
	MO	10	10	10
	MT	10	10	10
	NE	10	10	10
	NV	13	13	13
	NH	10	10	10
	NJ	10	10	10
	NM	10	10	10
	NY	10	10	10
	NC	10	10	10
	OH	15	15	15
	OK	30	30	90
	OR	30	30	90
	PA	10	10	10
	PR	*	10	*
	RI	10	10	10
	SC	10	10	10
	SD	10	10	10
	TN	10	10	10
	TX	10	10	10
	UT	10	10	10
	VT	10	10	10
	VI	10	10	30
	VA	10	10	10
	WA	10	10	10
	WV	13	13	13
	WI	45	45	90
	WY	10	10	10

*No explanation - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

42. Indicate whether or not your state plans to take each of the actions listed below, once your state IEVS is fully implemented, to attempt to reconcile the DEPRA 30 day action deadline with your state's right to due process laws. (CHECK ONE BOX FOR EACH ACTION.)

STATE	Question			
	42.1	42.2	42.3	42.4
AK	2	4	2	0
AZ	4	5	1	0
AR	1	4	2	0
CA	2	3	2	0
CO	2	3	1	0
CT	1	3	1	0
DE	5	5	1	0
DC	3	4	3	0
FL	2	3	3	0
GA	1	4	2	1
GU	1	5	1	0
HI	4	2	1	0
ID	4	4	2	0
IL	2	4	1	0
IN	2	3	2	0
IA	4	3	2	0
KS	1	4	1	0
KY	4	3	1	0
LA	2	5	1	0
ME	2	5	1	0
MD	5	5	5	0
MA	4	4	2	0
MN	3	4	1	0
MS	3	3	1	1
MO	4	5	2	0
MT	3	5	1	0
NE	1	4	1	0
NV	2	4	2	0
NH	3	5	1	0
NJ	3	3	1	0
NM	4	5	1	0
NY	3	4	3	0
NC	2	4	2	1
OH	1	1	1	0
OK	2	5	2	0
OR	2	*	1	0
PA	1	5	1	0
PR	2	3	2	0
RI	1	4	1	0
SC	3	3	1	0
SD	2	5	1	0
TN	1	5	1	0
TX	3	4	1	0
UT	2	4	1	0
VT	1	5	1	0
VI	2	3	1	0
VA	1	3	1	0
WA	2	3	1	1
WV	2	4	2	0
WI	4	5	1	0
WY	3	5	1	0

	DEF- FINI- TLY YES	PRO- BABLY YES	UN- CER- TAIN	PRO- BABLY NO	DEF- FINI- TLY NO
	1	2	3	4	5
1. Streamline the case follow-up process to shorten case processing time					
2. Increase the number of eligibility workers					
3. Make the best effort to comply with DEPRA as well as state laws given available resources					
4. Other (SPECIFY)					

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

VII. <u>EXCHANGING NEEDS-BASED PROGRAM</u> <u>DATA WITH OTHER STATES</u>	STATE	Question	
		43	44
43. With how many states does your state currently have an ongoing agreement for the exchange of needs-based program data? (ENTER NUMBER. IF NONE, ENTER "0".)	AK	0	0
	AZ	0	0
	AR	1	0
	CA	2	1
	CO	0	0
	CT	0	0
	DE	0	0
_____ states	DC	2	2
	FL	0	0
	GA	0	0
	GU	1	1
44. In how many of these agreements are there specific provisions safeguarding the confidentiality of the data exchanged? (ENTER NUMBER. IF NONE, ENTER "0".)	HI	0	0
	ID	0	0
	IL	15	15
	IN	0	0
	IA	2	2
_____ agreements	KS	1	1
	KY	0	0
	LA	0	0
	ME	0	0
	MD	2	0
	MA	0	0
	MN	0	0
	MS	2	2
	MO	2	2
	MT	0	0
	NE	0	0
	NV	0	0
	NH	0	0
	NJ	2	2
	NM	0	0
	NY	0	0
	NC	5	5
	OH	0	0
	OK	0	0
	OR	2	2
	PA	6	6
	PR	1	1
	RI	0	0
	SC	0	0
	SD	0	0
	TN	0	0
	TX	0	0
	UT	0	0
	VT	0	0
	VI	0	0
	VA	4	0
	WA	0	0
	WV	0	0
	WI	6	6
	WY	0	0

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

Listed below are factors that might affect two states' ability to reach an ICVS data exchange agreement. Indicate what effect, if any, each has on your state's ability to reach such agreements. (CHECK ONE BOX FOR EACH FACTOR.)

	GREATLY IMPEDES	SOMEWHAT IMPEDES	NEITHER IMPEDES NOR PROMOTES	SOMEWHAT PROMOTES	GREATLY PROMOTES
	1	2	3	4	5
1. States' privacy/confidentiality laws					
2. Compatibility of states' computer systems					
3. One of the two states may discourage interstate exchanges					
4. Compatibility of states' record file layouts					
5. Other (SPECIFY)					

STATE	Question				
	45.1	45.2	45.3	45.4	45.5
AK	4	3	1	2	0
AZ	*	*	*	*	*
AR	3	3	3	3	0
CA	2	2	1	2	0
CO	2	2	2	1	0
CT	1	2	1	1	0
DE	2	2	1	2	0
DC	3	3	2	2	0
FL	3	3	1	2	0
GA	3	3	3	3	0
GU	2	1	2	1	0
HI	2	2	2	2	0
ID	2	1	2	2	0
IL	3	2	2	2	0
IN	3	1	2	1	0
IA	2	3	2	1	0
KS	2	2	2	2	1
KY	3	2	2	2	0
LA	3	3	2	3	1
ME	3	3	1	2	0
MD	3	4	1	4	0
MA	1	1	1	1	1
MN	2	1	3	1	0
MS	*	2	1	2	0
MO	3	2	3	1	1
MT	3	2	3	5	0
NE	3	3	1	3	0
NV	3	1	2	1	0
NH	1	2	2	3	0
NJ	3	2	4	2	0
NM	3	1	2	2	0
NY	2	3	2	3	0
NC	2	2	2	2	0
OH	3	3	3	3	0
OK	2	5	1	3	0
OR	3	3	3	3	0
PA	3	2	3	2	1
PR	2	3	2	4	0
RI	1	2	1	2	0
SC	3	3	3	3	0
SD	3	3	3	3	0
TN	2	3	3	3	0
TX	2	1	1	1	0
UT	3	2	2	2	0
VT	3	3	3	3	0
VI	3	2	1	2	1
VA	3	2	3	2	0
WA	2	2	1	2	0
WV	4	4	3	3	0
WI	1	1	1	1	0
WY	*	*	*	*	*

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question	
		46	47
46. In your opinion, which of these factors is the greatest impediment to your state's ability to reach IEVS data exchange agreements with other states? (CHECK ONE.)	AK	3	1
	AZ	*	*
	AR	5	0
	CA	3	0
1. [] States' privacy/confidentiality laws	CO	4	1
	CT	3	1
	DE	4	0
2. [] Compatibility of states' computer systems	DC	1	1
	FL	3	0
	GA	3	0
3. [] One of the two states might discourage interstate exchanges	GU	2	1
	HI	2	0
	ID	2	0
4. [] Compatibility of states' record file formats	IL	3	0
	IN	4	0
	IA	4	1
5. [] Other (SPECIFY.)	KS	4	1
	KY	5	0
	LA	5	1
	ME	5	0
	MD	5	1
	MA	1	0
47. Please describe any other reasons why your state has difficulty reaching data exchange agreements with other states.	MN	2	1
	MS	2	1
	MO	4	1
	MT	2	1
	NE	3	0
	NV	2	1
	NH	3	0
	NJ	2	0
	NM	2	0
	NY	3	1
	NC	2	0
	OH	5	1
	OK	3	0
	OR	5	0
	PA	5	0
	PR	2	0
	RI	1	0
	SC	3	1
	SD	5	0
	TN	2	0
	TX	3	0
	UT	2	0
	VT	5	0
*No response - either omitted with no explanation or skipped according to questionnaire instructions.	VI	4	0
	VA	2	0
	WA	5	0
	WV	4	0
	WI	2	0
	WY	*	1

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

VIII. <u>CASE VOLUME & DISPOSITION TRACKING SYSTEM</u>	STATE	Question		
		48	49	
48. DEFRA regulations require states to establish a system to annually account for the volume and disposition of cases identified through an IEVS. Which of the statements listed below best describes how your state plans to account for record volume and case action to comply with this DEFRA requirement by 10/1/86? (CHECK ONE.)	AK	4	2	
	AZ	4	2	
	AR	4	1	
	CA	3	1	
	CO	4	1	
	CT	3	3	
	DE	4	1	
	DC	3	1	
	FL	4	3	
	1. [] Both record volume accounting and case action tracking will be done manually	GA	4	3
		GU	3	4
		HI	1	3
	2. [] Record volume accounting will be done manually; case action tracking will be automated	ID	3	2
		IL	4	3
		IN	1	1
		IA	3	1
	3. [] Record volume accounting will be automated; case action tracking will be done manually	KS	3	1
		KY	4	2
		LA	4	4
		ME	4	2
	4. [] Both record volume accounting and case action tracking will be automated	MD	1	4
		MA	4	4
		MN	1	4
		MS	1	1
		MO	1	1
	IX. <u>STATE'S USE OF IRS AND SSA TAX DATA</u>	MT	3	1
		NE	1	2
		NV	3	3
	49. Has your state signed final tax data exchange agreements with the IRS and/or SSA? (CHECK ONE.)	NH	3	4
		NJ	4	2
		NM	1	1
	1. [] Signed agreement with IRS but not SSA	NY	4	1
		NC	3	3
		OH	3	2
		OK	4	2
	2. [] Signed agreements with both IRS and SSA	OR	*	4
		PA	4	4
		PR	3	3
	3. [] Signed agreement with SSA but not IRS	RI	3	1
		SC	3	1
		SD	3	3
		TN	3	1
		TX	3	3
		UT	4	3
		VT	4	4
		VI	3	4
		VA	3	3
		WA	3	1
	WV	2	1	
	WI	3	2	
	WY	4	1	

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

50 Indicate the statement that best describes what your state will have to do to meet the safeguarding agreements for each of the four types of tax data listed below.
(CHECK ONE BOX FOR EACH TYPE OF DATA.)

	ADOPT/ CREATE NEW SYSTEM	EXTEN- SIVELY CHANGE EXISTING SYSTEM	MODERATELY CHANGE EXISTING SYSTEM	MINIMALLY CHANGE EXISTING SYSTEM	USE EXISTING SYSTEM AS IT STANDS
	1	2	3	4	5
1. IRS unearned income data					
2. SSA wage data					
3. SSA private pension data					
4. SSA self-employment income data					

STATE	Question			
	50.1	50.2	50.3	50.4
AK	5	5	5	5
AZ	5	5	5	5
AR	4	4	4	4
CA	3	3	5	3
CO	1	3	3	3
CT	1	4	3	3
DE	3	3	3	3
DC	1	2	2	2
FL	1	3	3	3
GA	3	3	3	3
GU	3	3	3	1
HI	3	3	3	3
ID	3	4	4	4
IL	3	4	4	4
IN	2	4	4	4
IA	4	4	4	4
KS	3	5	5	5
KY	5	5	5	5
LA	1	1	4	1
ME	2	2	2	2
MD	1	4	4	4
MA	1	3	1	2
MN	2	4	4	4
MS	1	3	1	1
MO	3	3	3	3
MT	2	2	2	2
NE	1	1	1	1
NV	1	3	3	3
NH	4	5	5	5
NJ	1	1	1	1
NM	3	3	3	3
NY	3	3	3	3
NC	*	5	5	5
OH	5	5	5	5
OK	4	5	5	5
OR	*	*	*	*
PA	1	1	3	1
PR	2	4	4	4
RI	1	1	1	1
SC	1	5	5	5
SD	1	2	2	2
TN	5	5	5	5
TX	3	5	5	5
UT	3	3	3	3
VT	4	5	5	5
VI	1	1	1	1
VA	3	5	5	5
WA	2	2	2	2
WV	3	3	3	3
WI	2	2	2	2
WY	1	1	1	1

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

Question
STATE 51.1A 51.1B 51.2A 51.2B 51.3A 51.3B

51 In SECTION A indicate how often, if ever, case files from each of the programs listed below contain historical income data that can be compared with older IRS and SSA tax data. (CHECK ONE BOX FOR EACH PROGRAM.)

In SECTION B indicate whether or not this historical case income data is automated when it is available. (CHECK ONE BOX FOR EACH PROGRAM.)

	SECTION A CASEFILES CONTAIN HISTORICAL CASE INCOME DATA... (CHECK ONE.)			SECTION B HISTORICAL CASE INCOME DATA AUTOMATED? (CHECK ONE.)		
	ALWAYS OR ALMOST ALWAYS	SOMETIMES	RARELY, IF EVER	YES	NO	NOT AP- PLICABLE (CASE DATA RARELY, IF EVER, EXISTS)
	1	2	3	4	5	6
1 Medicaid						
2 AFDC						
3 Food stamps						

AK	1	4	1	4	1	4
AZ	3	6	3	6	3	6
AR	1	5	1	5	1	5
CA	1	5	1	5	1	5
CO	1	5	1	5	1	5
CT	2	4	2	4	2	4
DE	2	4	2	4	2	4
DC	3	6	3	6	3	6
FL	2	5	2	5	2	5
GA	1	5	1	5	1	5
GU	1	5	3	6	1	5
HI	1	5	1	5	1	5
ID	3	4	2	4	2	4
IL	1	4	1	4	1	4
IN	1	5	1	5	1	4
IA	2	4	2	4	2	4
KS	2	5	2	5	2	5
KY	1	4	1	4	1	4
LA	1	5	1	5	1	5
ME	2	5	2	4	2	4
MD	1	5	1	5	1	5
MA	1	5	1	5	1	5
MN	3	6	3	6	3	6
MS	2	5	2	5	3	5
MO	1	5	1	5	1	5
MT	1	5	1	5	1	5
NE	1	5	1	5	1	5
NV	1	5	1	5	1	5
NH	1	5	1	5	1	5
NJ	2	6	2	6	2	6
NM	2	5	2	5	2	5
NY	1	5	1	5	1	5
NC	2	5	2	5	2	5
OH	1	4	1	4	1	4
OK	2	5	2	5	2	5
OR	1	5	1	5	2	5
PA	2	5	2	5	2	5
PR	*	*	2	5	*	*
RI	1	5	1	5	1	5
SC	2	5	3	5	2	5
SD	1	5	1	4	1	4
TN	1	5	1	5	1	5
TX	3	5	3	5	3	5
UT	1	5	1	5	1	5
VT	2	4	1	4	1	4
VI	1	5	1	5	1	5
VA	3	5	3	5	3	5
WA	2	5	2	5	2	5
WV	3	6	3	6	3	6
WI	1	5	1	5	1	5
WY	1	5	1	5	1	5

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

X. ADDITIONAL INFORMATION

52. Beyond its base requirements, DEFRA also encourages states to access and use other sources of information to verify the eligibility of program applicants/recipients.

In SECTION A indicate whether or not your state currently uses, or is planning to use each of the information sources listed below for eligibility verification. (CHECK ONE BOX FOR EACH SOURCE.)

For each source your state is currently using, indicate in SECTION B whether the eligibility verification process is most often automated or manual. (CHECK ONE BOX FOR EACH SOURCE YOUR STATE CURRENTLY USES.)

SECTION A
STATE CURRENTLY USES?

SECTION B
VERIFICATION PROCESS...

	YES, STATE CURRENTLY USES	NO, BUT STATE PLANS TO USE	STATE NEITHER USES NOR PLANS TO USE	AUTOMATED ON-LINE	AUTOMATED OFF-LINE	MANUAL
	1	2	3	4	5	6
1. Birth records						
2. Death records						
3. Marriage records						
4. Divorce records						
5. Drivers' license records						
6. Auto registration records						
7. Selective service records						

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

STATE	Question													
	52.1A	52.1B	52.2A	52.2B	52.3A	52.3B	52.4A	52.4B	52.5A	52.5B	52.6A	52.6B	52.7A	52.7B
AK	1	6	1	6	1	6	1	6	1	6	1	6	3	*
AZ	1	6	1	6	3	*	3	*	1	6	1	4	3	*
AR	1	6	1	6	1	6	1	6	3	*	1	6	3	*
CA	3	*	1	5	3	*	3	*	3	*	2	5	3	*
CO	1	6	1	6	1	6	1	6	1	6	1	5	3	*
CT	3	*	3	*	3	*	3	*	3	*	1	6	3	*
DE	1	6	1	6	1	6	1	6	1	*	1	4	1	6
DC	1	6	1	6	1	6	1	6	1	4	1	4	3	*
FL	*	*	*	*	*	*	*	*	*	*	*	*	*	*
GA	1	4	2	4	3	*	3	*	3	*	2	4	3	*
GU	1	6	3	*	3	*	1	6	3	*	1	6	3	*
HI	1	6	3	*	1	6	1	6	3	*	1	4	3	*
ID	1	6	1	6	1	6	1	6	3	*	3	*	3	*
IL	3	*	1	6	1	6	3	*	1	6	1	6	3	*
IN	1	6	1	6	1	6	1	6	1	5	1	5	3	*
IA	3	*	3	*	3	*	3	*	2	*	2	*	3	*
KS	3	*	3	*	3	*	3	*	3	*	3	*	3	*
KY	1	6	1	6	3	*	3	*	3	*	1	4	3	*
LA	1	6	1	6	1	6	1	6	3	*	3	*	3	*
ME	3	*	3	*	3	*	3	*	1	4	1	4	3	*
MD	3	*	3	*	3	*	3	*	2	6	2	6	3	*
MA	1	6	1	6	1	6	1	6	1	5	1	5	1	6
MN	1	6	1	6	1	6	1	6	1	4	1	4	1	6
MS	1	6	1	6	1	6	1	6	1	6	2	6	3	*
MO	1	4	1	4	3	*	3	*	3	*	3	*	3	*
MT	1	6	1	6	1	6	1	6	3	*	1	6	3	*
NE	1	6	1	6	1	6	1	6	1	4	1	4	3	*
NV	1	6	1	6	1	6	1	6	1	6	1	6	1	6
NH	1	6	1	6	1	6	1	6	1	6	1	5	3	*
NJ	1	6	3	*	1	6	1	6	1	5	1	5	3	*
NM	1	6	1	6	1	6	1	6	1	4	1	4	3	*
NY	1	6	1	5	1	6	3	*	1	4	1	4	3	*
NC	1	6	1	6	1	6	1	6	3	*	1	4	3	*
OH	3	*	3	*	3	*	3	*	1	5	1	5	3	*
OK	1	6	3	*	3	*	3	*	3	*	3	*	3	*
OR	3	*	3	*	3	*	3	*	3	*	3	*	3	*
PA	1	6	1	5	1	6	1	6	1	6	1	6	3	*
PR	1	6	1	6	1	6	1	6	*	*	1	6	*	*
RI	1	6	1	6	1	6	1	6	1	6	1	6	3	*
SC	1	6	1	6	1	6	1	6	1	6	1	5	3	*
SD	2	4	2	4	2	4	2	4	3	*	2	4	3	*
TN	1	4	3	*	3	*	3	*	3	*	3	*	3	*
TX	3	*	3	*	3	*	3	*	3	*	3	*	3	*
UT	3	*	3	*	3	*	3	*	1	4	1	4	3	*
VT	3	*	3	*	3	*	3	*	3	*	1	4	3	*
VI	1	6	1	6	1	6	1	6	1	6	1	6	1	6
VA	1	6	1	6	1	6	1	6	1	5	1	5	3	*
WA	2	4	3	*	3	*	3	*	2	5	2	5	3	*
WV	3	*	3	*	3	*	3	*	3	*	1	4	3	*
WI	2	*	2	5	2	*	2	*	2	*	2	*	3	*
WY	3	*	1	5	3	*	3	*	3	*	2	*	3	*

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

X. ADDITIONAL INFORMATION

52. Beyond its base requirements, DEFRA also encourages states to access and use other sources of information to verify the eligibility of program applicants/recipients.

In SECTION A indicate whether or not your state currently uses, or is planning to use each of the information sources listed below for eligibility verification. (CHECK ONE BOX FOR EACH SOURCE.)

For each source your state is currently using, indicate in SECTION B whether the eligibility verification process is most often automated or manual. (CHECK ONE BOX FOR EACH SOURCE YOUR STATE CURRENTLY USES.)

	<u>SECTION A</u> STATE CURRENTLY USES?			<u>SECTION B</u> VERIFICATION PROCESS...		
	YES, STATE CURRENTLY USES 1	NO, BUT STATE PLANS TO USE 2	STATE NEITHER USES NOR PLANS TO USE 3	AUTOMATED ON-LINE 4	AUTOMATED OFF-LINE 5	MANUAL 6
8. Police records						
9. Tax records (other than fed.)						
10. Housing records						
11. Bank records						
12. Insurance records						
13. Credit records						
14. Other (SPECIFY.) _____ _____						

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	Question													
	STATE	52.0A	52.0B	52.9A	52.9B	52.10A	52.10B	52.11A	52.11B	52.12A	52.12B	52.13A	52.13B	52.14A
AK	3	*	3	*	3	*	1	6	3	*	3	*	1,1,1	4,4,4
AZ	3	*	3	*	3	*	1	6	3	*	3	*	1,2	6,6
AR	3	*	3	*	1	6	1	6	1	6	3	*	*	*
CA	1	5	1	5	3	*	3	*	3	*	3	*	1,2,2	5,5,5
CO	3	*	1	6	1	6	1	6	1	6	1	6	*	*
CT	3	*	2	5	3	*	1	5	3	*	3	*	*	*
DE	1	6	1	6	1	6	1	6	1	6	1	6	*	*
DC	3	*	1	6	3	*	3	*	3	*	1	4	*	*
FL	*	*	*	*	*	*	*	*	*	*	*	*	*	*
GA	2	4	2	*	2	*	2	*	2	*	1	6	*	*
GU	3	*	2	*	3	*	2	*	3	*	3	*	*	*
HI	3	*	3	*	3	*	1	5	3	*	3	*	*	*
ID	3	*	3	*	1	6	1	6	1	6	3	*	*	*
IL	1	6	1	6	2	*	3	*	1	6	1	6	*	*
IN	3	*	1	6	1	6	1	6	1	6	3	*	*	*
IA	3	*	2	*	3	*	3	*	1	5	3	*	*	*
KS	3	*	3	*	3	*	3	*	3	*	3	*	1	5
KY	3	*	3	*	3	*	3	*	3	*	3	*	*	*
LA	1	6	3	*	3	*	1	6	1	6	3	*	*	*
ME	3	*	3	*	3	*	1	6	3	*	3	*	*	*
MD	3	*	3	*	3	*	1	6	3	*	3	*	1	6
MA	1	6	1	6	1	6	1	6	1	6	3	*	*	*
MN	3	*	1	6	1	6	1	6	1	6	3	*	*	*
MS	3	*	1	6	1	6	1	6	1	6	3	*	*	*
MO	3	*	3	*	3	*	1	6	1	6	3	*	*	*
MT	3	*	3	*	3	*	1	6	3	*	3	*	*	*
NE	3	*	3	*	3	*	1	6	1	6	3	*	*	*
NV	1	6	*	*	1	6	1	6	1	6	1	6	1,1	6,6
NH	3	*	3	*	1	6	1	6	1	6	1	5	*	*
NJ	3	*	3	*	1	6	1	6	1	6	1	5	*	*
NM	1	6	1	6	3	*	1	6	3	*	3	*	*	*
NY	3	*	3	*	3	*	1	6	3	*	3	*	*	*
NC	3	*	1	6	1	6	1	6	1	6	3	*	*	*
OH	3	*	1	5	3	*	1	5	3	*	3	*	*	*
OK	3	*	2	4	1	6	1	6	1	6	1	6	*	*
OR	3	*	3	*	3	*	3	*	3	*	3	*	*	*
PA	1	5	3	*	3	*	1	5	1	5	1	5	1	5
PR	*	*	*	*	1	6	2	6	1	6	*	*	*	*
RI	3	*	1	6	1	6	1	6	1	6	3	*	*	*
SC	1	6	3	*	1	6	1	6	1	6	3	*	*	*
SD	3	*	3	*	2	4	3	*	3	*	3	*	*	*
TN	3	*	2	*	3	*	3	*	3	*	3	*	*	*
TX	3	*	3	*	3	*	3	*	3	*	3	*	*	*
UT	3	*	3	*	3	*	2	6	3	*	1	6	1	6
VT	3	*	3	*	3	*	1	4	3	*	3	*	*	*
VI	1	6	1	6	1	6	1	6	1	6	1	6	*	*
VA	1	6	2	*	1	6	1	6	1	6	1	6	*	*
WA	3	*	3	*	3	*	3	*	3	*	3	*	2,2	5,5
WV	3	*	3	*	3	*	3	*	3	*	3	*	*	*
WI	3	*	2	*	2	*	2	*	3	*	3	*	*	*
WY	3	*	3	*	3	*	2	*	3	*	3	*	1,1	5,5

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

	STATE	Question	
		53	54
53. In responding to the cost vs. benefit questions earlier in this questionnaire, were any of your responses based on actual studies or analyses your state has done?			
1. [] Yes	AK	2	*
	AZ	2	*
	AR	*	*
	CA	1	1
	CO	2	*
	CT	1	0
	DE	2	*
	DC	2	*
	FL	2	*
	GA	2	*
	GU	1	0
	HI	2	*
	ID	2	*
	IL	1	0
	IN	2	*
	IA	2	*
	KS	2	*
	KY	2	*
	LA	2	*
	ME	1	0
	MD	2	*
	MA	1	0
	MN	2	*
	MS	2	*
	MO	2	*
	MT	*	*
	NE	1	0
	NV	2	*
	NH	2	*
	NJ	2	*
	NM	2	*
	NY	2	*
	NC	2	*
	OH	2	*
	OK	2	*
	OR	2	*
	PA	2	*
	PR	2	*
	RI	2	*
	SC	2	*
	SD	1	0
	TN	2	*
	TX	2	*
	UT	1	0
	VT	2	*
	VI	2	*
	VA	2	*
	WA	1	0
	WV	2	*
	WI	2	*
	WY	2	*
54. We are interested in obtaining the results of any cost/benefit studies or analyses your state has done, related to the DEFRA, IEVS provisions. However, we would like you to give priority to the completion and return of this questionnaire. Under separate cover and at your convenience, please send a copy of such reports to us at the address shown on the front of this form.			
*No response - either omitted with no explanation or skipped according to questionnaire instructions.			

DETAILED QUESTIONNAIRE DATA: 51 RESPONDENTS

For an analysis of the narrative comments received for question 55, see appendix IV.

DETAILED QUESTIONNAIRE DATA:
ALABAMA AND NORTH DAKOTA

The questionnaire responses from Alabama and North Dakota are shown in tables III.1 and III.2. They responded according to the way their state AFDC, Medicaid, and Food Stamp programs are organized. The responses are formatted by question number. Refer to appendix I for complete questions.

Table III.1: Program Experience of Officials
Filling Out Questionnaire^a

<u>Program</u>	<u>Alabama</u>	<u>North Dakota</u>
AFDC	1-2	--
Medicaid	1-2	1-2-3
Food Stamps	1-2	--
AFDC and Food Stamps	--	1-2-4

^aReply to question on page 1 of the questionnaire.

DETAILED QUESTIONNAIRE DATA:
ALABAMA AND NORTH DAKOTA

Table III.2: Alabama and North Dakota Officials' Responses
to Questionnaire

<u>Question</u>	<u>Programs^a</u>				
	<u>Alabama</u>			<u>North Dakota</u>	
	<u>AFDC</u>	<u>MED</u>	<u>FS</u>	<u>AFDC/FS</u>	<u>MED</u>
1	1	1	1	1	3
2	*	*	*	*	3
3	*	*	*	*	5
4	*	*	*	*	3
5	*	*	*	*	1
6	*	*	*	*	3
7	*	*	*	*	2
8	1	1	2	1	1
9.1	1	1	*	1	1
9.2	1	1	*	2	2
9.3	2	2	*	1	2
9.4	0	0	*	0	1
10	1	2	*	1	2
11.1A	1	1	1	1	1
11.1B	2	2	2	2	1
11.1C	3	3	3	2	3
11.1D	5	5	5	5	5
11.2A	1	1	1	4	1
11.2B	2	2	2	*	1
11.2C	2	2	2	1	3
11.2D	5	5	5	5	5
11.3A	1	1	1	4	1
11.3B	2	2	2	*	1
11.3C	2	2	2	1	3
11.3D	5	5	5	5	5
11.4A	1	1	1	1	1
11.4B	2	2	2	2	1
11.4C	2	2	2	2	3
11.4D	5	5	5	5	5
11.5A	1	1	1	1	1
11.5B	2	2	2	2	1
11.5C	2	2	2	2	3
11.5D	5	5	4	4	5
11.6A	1	1	1	1	1
11.6B	2	2	2	2	1

DETAILED QUESTIONNAIRE DATA:
ALABAMA AND NORTH DAKOTA

Question	Programs ^a				
	Alabama			North Dakota	
	AFDC	MED	FS	AFDC/FS	MED
11.6C	2	2	2	3	3
11.6D	5	5	5	4	4
11.7A	1	1	1	1	1
11.7B	2	2	2	2	1
11.7C	3	3	3	3	3
11.7D	4	4	4	4	5
11.8A	1	1	1	1	1
11.8B	2	2	2	2	1
11.8C	3	3	3	3	3
11.8D	4	4	4	4	5
11.9A	1	1	1	1	1
11.9B	2	2	2	2	1
11.9C	3	3	3	3	3
11.10A	1	1	1	1	1
11.10B	2	2	2	2	1
11.10C	3	3	3	3	3
11.11A	1	1	1	4	1
11.11B	2	2	2	*	1
11.11C	1	1	1	1	3
11.12A	1	1	1	1	1
11.12B	2	2	2	2	1
11.12C	1	1	1	3	3
11.13A	1	1	1	1	1
11.13B	2	2	2	2	1
11.13C	3	3	3	3	3
11.13D	4	4	4	4	5
11.14A	1	1	1	1	1
11.14B	2	2	2	2	1
11.14C	3	3	3	3	3
11.14D	4	4	4	4	5
11.15A	1	1	1	1	1
11.15B	2	2	2	2	1
11.15C	3	3	3	3	3
11.15D	4	4	4	4	5
12	1	1	1	1	1
13	2	2	2	2	2

DETAILED QUESTIONNAIRE DATA:
ALABAMA AND NORTH DAKOTA

Question	Programs ^a				
	Alabama			North Dakota	
	AFDC	MED	FS	AFDC/FS	MED
14	*	*	*	*	*
15.1	1	2	2	1	2
15.2	2	2	1	1	1
15.3	2	1	2	1	1
16	1	1	2	1	2
17	2	2	*	2	*
18.1	1	2	2	1	2
18.2	2	2	1	1	2
18.3	2	1	2	1	1
19.1	*	*	1	*	1
19.2	2	*	*	1	*
19.3	*	2	*	1	*
20.1	2	2	2	2	2
20.2	2	2	2	2	2
21	3	3	3	3	1
22	6	6	6	6	3
23	2	2	2	1	1
24	1	1	1	2	2
25	*	*	*	2	1
26	*	*	*	1	1
27	*	*	*	1	1
28	*	*	*	2	2
29	*	*	*	2	1
30	*	*	*	1	2
31.1	*	*	1	*	5
31.2	2	*	*	1	*
31.3	*	2	*	1	*
32.1	*	*	1	*	3
32.2	1	*	*	1	*
32.3	*	1	*	1	*
33	4	4	4	3	3
34	2	2	2	1	1
35	3	3	3	*	*
36.1A	1	1	1	1	1
36.1B	4	4	4	4	4
36.2A	3	3	3	3	1

DETAILED QUESTIONNAIRE DATA:
ALABAMA AND NORTH DAKOTA

<u>Question</u>	<u>Programs^a</u>				
	<u>Alabama</u>			<u>North Dakota</u>	
	<u>AFDC</u>	<u>MED</u>	<u>FS</u>	<u>AFDC/FS</u>	<u>MED</u>
36.2B	4	4	4	4	4
36.3A	1	1	1	1	1
36.3B	4	4	4	4	4
36.4A	1	1	1	1	1
36.4B	4	4	4	4	4
37	1	1	1	1	2
38	3	3	1	1	4
39	4	4	1	2	4
40.1	1	1	*	*	2
40.2	1	1	*	*	1
40.3	1	1	*	*	2
40.4	2	2	*	*	2
40.5	2	2	*	*	2
40.6	0	0	*	*	0
41.1	*	*	10	*	10
41.2	10	*	*	10	*
41.3	*	10	*	10	*
42.1	3	3	3	2	3
42.2	3	3	3	5	5
42.3	1	1	1	1	2
42.4	0	0	0	0	0
43	0	0	0	0	0
44	0	0	0	0	0
45.1	3	3	3	3	3
45.2	1	1	1	3	2
45.3	2	2	2	1	1
45.4	2	2	2	2	3
45.5	0	0	0	0	0
46	2	2	2	5	3
47	0	0	0	1	0
48	4	4	3	4	4
49	3	4	4	4	4
50.1	3	3	3	2	1
50.2	3	3	3	2	1
50.3	3	3	3	2	1

DETAILED QUESTIONNAIRE DATA:
ALABAMA AND NORTH DAKOTA

<u>Question</u>	<u>Programs^a</u>				
	<u>Alabama</u>			<u>North Dakota</u>	
	<u>AFDC</u>	<u>MED</u>	<u>FS</u>	<u>AFDC/FS</u>	<u>MED</u>
50.4	3	3	3	2	1
51.1A	*	*	1	*	3
51.1B	*	*	4	*	5
51.2A	1	*	*	1	*
51.2B	4	*	*	4	*
51.3A	*	2	*	1	*
51.3B	*	5	*	4	*
52.1A	1	3	3	1	1
52.1B	6	*	*	6	6
52.2A	1	3	3	1	1
52.2B	6	*	*	6	4
52.3A	1	3	3	1	1
52.3B	6	*	*	6	6
52.4A	3	3	3	1	1
52.4B	*	*	*	6	6
52.5A	3	3	3	1	2
52.5B	*	*	*	6	*
52.6A	1	3	3	1	1
52.6B	6	*	*	4	4
52.7A	3	3	3	3	2
52.7B	*	*	*	*	*
52.8A	3	3	3	3	2
52.8B	*	*	*	*	*
52.9A	3	3	3	3	2
52.9B	*	*	*	*	*
52.10A	3	3	3	3	2
52.10B	*	*	*	*	*
52.11A	1	1	1	1	1
52.11B	6	6	6	6	6
52.12A	3	3	3	3	2
52.12B	*	*	*	*	*
52.13A	3	3	3	3	2
52.13B	*	*	*	*	*
52.14A	0	0	0	0	0
52.14B	0	0	0	0	0

DETAILED QUESTIONNAIRE DATA:
ALABAMA AND NORTH DAKOTA

<u>Question</u>	<u>Programs^a</u>				
	<u>Alabama</u>			<u>North Dakota</u>	
	<u>AFDC</u>	<u>MED</u>	<u>FS</u>	<u>AFDC/FS</u>	<u>MED</u>
53	2	2	2	2	2
54	*	*	*	*	*
55	b	b	b	b	b

Legend:

*No response - either omitted with no explanation or skipped according to questionnaire instructions.

^aAFDC - Aid to Families with Dependent Children
 MED - Medicaid
 FS - Food Stamps

^bFor an analysis of the comments submitted by 35 jurisdictions on the DEFRA regulation see appendix IV.

ANALYSIS OF NARRATIVE COMMENTS

Narrative comments were provided to us by 35 of the 53 jurisdictions that replied to our questionnaire. In this appendix we have categorized the comments according to various IEVS concerns and indicated the total number of jurisdictions commenting in each category. In cases where comments fit more than one concern we placed them according to where we believed the sentiment was strongest. In addition, for each category we have included only those comments which, in our opinion, exemplify the jurisdictional sentiment related to the concerns in that category.

PROCESSING TIME FRAMES

The most frequently mentioned concerns dealt with the states' anticipated difficulties in having to complete appropriate action on all information items received from the data sources within 30 days. During this period, states are required to: (1) compare match data against case record information; (2) identify new, discrepant, or unverified facts; (3) investigate and verify information where warranted; and (4) send a notice of intended case action or document the decision not to send one. The only exception is that up to 20 percent of the information items may be delayed beyond the 30-day time frame because third party verification is not received or is received after that period. Included among the comments voiced by 18 states were:

- A specific requirement which is viewed as unreasonable and difficult to achieve is that action must be taken on all "hits" [matches] regardless of magnitude within 30 days.
- The time limits established for acting on information are inadequate. Far too many circumstances exist that work against states in meeting these requirements.
- There is an overwhelming burden on eligibility workers to initiate case actions within the specified time frame, especially with the initial matches.
- The 30-day response requirement allows for insufficient time for appropriate follow-up activities. The volume of cases, coupled with other critical work tasks, makes compliance a difficult issue.

- IEVS regulations are too restrictive in requiring action within 30 days. Matches could be handled much more efficiently at the next case review date.
- Third party verification of IRS and SSA tax information is not achievable in the 30-day period.
- We remain unable to identify a way to act on all the discrepancies within the 30-day time frame allowed without badly disrupting the agency's other activities. Our planning efforts are complicated by the fact that it remains unclear exactly what constitutes "action" in the eyes of federal regulators.
- Error rates will probably increase as workers rush to meet 30-day time frames and, thus, let other work slide.
- The requirement to handle the matched information within 30 days places the state and its local departments in a priority setting situation that may not be the best action for error reduction.

The requirement for states to complete appropriate action on all data matches within 30 days concerned eight states because it does not permit them to set tolerances or to prioritize or target cases most likely to produce results. Their comments included the following:

- We have concerns with IEVS requirements for follow up on all match data.
- In January 1986, the Department of Public Welfare commented to the GAO on the proposed IEVS rules. Since then, we are especially alarmed that the final rules do not permit states to target their follow-up activity on the cases most likely to be in error. Final rules at 7 CFR Sec. 272.8(g)(1), 42 CFR 435.942, and 45 CFR 205.56(a)(1)(i) all may be read to require us to follow up on all discrepancies between our records and external match sources, such as the IRS.
- Federal agencies have, in our opinion, gone too far by requiring every case to be matched against every source and to prohibit the use of reasonable tolerance limits.
- States should be allowed to (1) prioritize "hits" to give emphasis to ones expected to be of most value; (2) have 30-day requirement for follow up only on priority "hits";

and (3) waive certain IEVS requirements for client populations that the state can show are not cost effective.

- Because of the increased paperwork created by IEVS, we expect our error rate to increase if states are not allowed to target hits. States need the flexibility to target hits in order to get at the ineligible or big dollar error cases first, rather than trying to react to every hit within 30 days.

COSTS VERSUS BENEFITS

Fourteen of the respondents voiced concerns over the cost outweighing benefits to be achieved by IEVS. Although there will be costs associated with requesting information, the primary cost is associated with case follow-up. The concerned states generally believe the matches will not be cost-effective in preventing incorrect eligibility and benefit amounts. The following comments are examples of their concerns:

- No cost/benefit analysis based on case activity has been accomplished.
- Long-range cost-effectiveness of DEFRA regulations is questionable.
- Although some aspects of matching against a particular source may be cost-effective, the net result of matching all cases will, for most states, cause costs to exceed benefits.
- A cost-effective evaluation using known information does not justify hiring the additional staff needed to comply with IEVS regulations.
- I do not feel this process will be cost-effective, particularly IRS information and SSA earnings records. I do feel wage and unemployment compensation are good for applications and recertifications/reviews.
- Our state has been below tolerance level in all three programs [AFDC, Food Stamp, and Medicaid] for the past few years. Therefore, since our error rates are so low it will not be cost-effective for us to implement IEVS.
- To insist that IEVS can be implemented in a cost-effective manner before every state has an

automated, on-line, state-wide integrated data base for all three programs [AFDC, Food Stamp, and Medicaid] is just not realistic.

- Productive matches may most often identify past overpaid benefits and would require significant additional expenditures/resources to recover those incorrect payments. Therefore, cost effectiveness of IEVS-mandated matches will be directly linked to the status of automation and resources for overpayment/ fraud investigation and collection units in each state.
- Our state does not feel that this wholesale match of information could be cost beneficial. We feel that until a state is fully automated, as we are not, that the system basically means matching everyone. Certain groups may be beneficial to match, but without an automated way to identify them, everyone has to be checked.
- Matching performed on elderly/disabled is not cost-effective.
- It is doubtful that benefits will equal costs, not only for the matches and investigations, but also in worker time diverted from other activities which will increase worker dissatisfaction and increase the QC [Quality Control] error rate.
- Overall, we can see no way that this system under any circumstances, will be cost effective.

Two of the responding states believed that states should be allowed to waive certain IEVS requirements for client populations that the states can show are not cost-effective. One state mentioned that a problem occurs because the treatment of income varies between programs. The state comment was:

- AFDC and Food Stamps use either prospective or retrospective considerations, based on initial application or continuing eligibility. Thus, a household currently receiving Food Stamps which applies for AFDC may use both last month's actual income and next month's expected income to determine eligibility. Medical Assistance calculates an expected monthly income for a 6-month period. The differences in rules among the programs inhibits the effective use of an "integrated" approach to computerized resolution of hits. Also, since program eligibility is often associated with loss (or

gain) of income during a quarter, only those cases which participated for the full quarter may be efficiently matched. "Hits" on individuals not participating for the full quarter are likely to be a waste of an [already overburdened] eligibility worker's time.

IEVS IMPLEMENTATION DATE

A major concern of 12 states was the difficulties they were having in meeting the IEVS implementation date of October 1, 1986. Several of these states believed implementation would take longer than permitted. Some of their comments were:

- Cannot meet 10/1/86 date.
- The time frame from publication of final federal regulations to required implementation date is too short.
- We have not been given enough time to implement IEVS with our outmoded computer system and shortage of staff.
- Eleven months passed between the publication of proposed rules and the final rules. This delay was significant in terms of our ability to achieve compliance by 10/1/86.
- Once again, states have been required to implement activities with a specific deadline without complete information/requirements.
- IEVS implementation should have been done in stages with more time allowed for programming of automated processes to allow for more efficient match processing and more efficient follow up.
- The most significant aspect of the IEVS DEFRA regulations is that the law provides no flexibility for orderly implementation. System must be rushed into production no later than October 1, 1986. This means costly interim systems.
- We are concerned that in a rush to implement IEVS by October 1, other error reduction efforts will be neglected, and error rates may actually rise, rather than fall as the Congress intended. For example, workers could be forced to slow down on redeterminations to make time for match follow up, even though redeterminations are a proven method for eliminating error.

- We had been planning to incorporate IEVS requirements into our new automated integrated eligibility system. However, our implementation schedule has been unavoidably delayed by the need to cancel a contract with our development consultant. We are now planning a new implementation timetable and we are very troubled by the possibility that building a stop-gap IEVS system will distract from efforts to complete our permanent system on time.
- The short time frame for implementation of these provisions require hurried developmental activities which are not of the quality that we could produce given a reasonable time frame for implementation.

FEDERAL TAX DATA: AGE AND
REPORTING PERIOD DIFFERENCES

Concerns over the differences in timeframes of IRS/SSA data used in the data matches were expressed by 11 states. The requirement for an annual match of recipients against IRS unearned income data was mentioned. The respondents questioned the usefulness of matching IRS unearned income information because it covers the calendar year and does not reflect current recipient circumstances. The requirement to access SSA income and wage data was also questioned because of its age and the fact that the periods in which it was reported differ from those used by the states.

- Receipt of outdated income data is a major concern.
- We have concerns about the usefulness of federal wage data.
- Our primary concern is that matching client or applicant files against up to 2-year old IRS tax data will require our field workers to contact all cases with discrepancies to confirm whether the old data reflects current circumstances and if the cases' eligibility or payment needs to be changed. Workers will discover upon follow up with clients, banks, and other sources that many of the apparent discrepancies do not, in fact, exist.
- The age of IRS and SSA information will cause both technical and practical problems. The information is likely to be out of date and will be more difficult to verify with third party sources than more current information. Additionally, older volumes of client

records may be archived and, therefore, less accessible for review.

- The agency has concerns about the dated IRS and SSA tax information. This will require additional staff time and a heavy volume of cases, yet significant results may be realized in only a few cases.
- Data from tax, SSA, and state wage files are reported by quarter and/or year. Program eligibility, however, is calculated based on "monthly income." Data is way outdated, of no use in determining current eligibility.
- Due to the age of federal income match information, limited impact on current and future eligibility is expected. Without an intricate, historical automated file of income for applicants, IEVS-mandated matches may result in substantial and fruitless manual efforts to compare previously reported information. Until they are automated, the costs of matches may skyrocket.

DELAYS IN ISSUING FINAL IEVS RULES

Delays in issuance of final federal regulations for implementation of IEVS were a concern for 11 states. They indicated the federal delays were going to be an obstacle to their ability to meet the October 1, 1986, implementation date. Among their concerns were:

- As of this date, June 16, 1986, the federal agencies have not provided the final standardized formats, federal reporting requirements, or the BENDEX [Beneficiary and Earnings Data Exchange] earnings file agreement letters for Medicaid cases. These items are critical for IEVS development and adversely affect our implementation schedules.
- Eleven months passed between the publication of the proposed rules and the final rules.
- The writing of a request for a waiver from the May 29, 1986, implementation date to a September 30, 1986, date was an unnecessary paperwork exercise since the waiver request did not have to reach the regional office until the May 29, 1986, initial implementation date. The time spent on writing the waiver could have been better spent on other implementation issues.

- The federal agencies have failed to do their part in a timely manner; in order to allow the states time to meet deadlines. Final rules were not out until February 28, 1986. Final standard formats did not arrive in the state until July 14, 1986.
- We were told in a letter from HHS dated April 4, 1986, that SSA was revising its agreement forms so states could comply with the IEVS requirement to obtain benefit and earnings data. The letter stated that the agreement should be available "within three weeks." We received the agreement on July 30, 1986, approximately 3 months later rather than 3 weeks!
- SSA has not furnished the states with the agreement to obtain SSA wage/self-employment/pension data on Medicaid cases. We have been advised that even when the agreement is furnished and signed, SSA in Baltimore will take 60 days to program for release of information to states. Thus, the states will be out of compliance in implementing this portion of the DEFRA regulations even with the waiver of October 1986.
- Once again, states have been required to implement activities with a specific deadline without complete information requirements.
- It is unfortunate that the federal rulemaking process consumed much of the available time for states to implement the DEFRA requirements.

FUNDING AND RESOURCES

The impact of the lack of funding and resources on states' ability to implement IEVS was of concern to nine states. Among their concerns were:

- Aside from the huge task and possible cost of developing an automated system to respond to DEFRA requirements, need for more staff resources is inevitable to comply with strict follow-up actions required to use and validate data secured.
- There is a lack of funds for ADP [automated data processing] development.
- Enhanced funding should be made available to offset state costs.

- Our initial assessment indicates the IEVS regulations will require an additional 105 positions in field operations on an ongoing basis. The additional staff is not available. Because we will be using staff already spread too thin, our Federal Quality Control sanction problems will increase.
- Full implementation and operation of IEVS in our state will cost about \$8.5 million annually (\$4.8 million in state funds). Most of these costs are attributable to federal regulations (not law) requiring unproductive matches.
- Full implementation of IEVS will require an additional 260 eligibility workers, clerical staff and investigators. This will cause transition problems in providing adequate space, equipment and training.
- We just passed our biennial budget; the next real opportunity for funding is July 1987. We will use current resources and divert from other activities.
- We do not have either the resources or the inclination to make major modifications in the Financial Assistance/Medical and Food Stamp systems.

QUALITY OF SSA
INFORMATION AND SYSTEMS

Five states expressed concerns over the quality of SSA information and systems they would be using as part of the data match. Among their comments were:

- Using SSA's Third Party Query System is a poor way to verify SSNs [social security numbers]. It still retains a manual system and the opportunity to transpose digits of the SSN. We would recommended that GAO conduct a study on the states' experiences in using the various SSA tape exchanges that are mandated by IEVS. Our state has experienced ongoing problems with SSA with respect to the BENDEX, SDX [State Data Exchange], buy-in, welfare enumeration, and SSN verification tapes. The tapes have been late, unreadable, or lost entirely.
- Enumeration system needs to be improved to assure more timely SSA response to state requests.

- The lack of uniformity in SSN requirements is an unnecessary complication in program administration. Obtaining verification of SSNs will not be possible in some cases where SSA records are incorrect or outdated.

The following favorable comment concerning SSA validation and data systems was received from one state:

- The major positive impact of IEVS is the SSN enumeration and verification requirements. This will "clean up" our case records allowing our state to match with IRS, SSA, and UC [Unemployment Compensation] agencies for valid data. This will assist in deterring possible quality control errors and also reducing fraud, and abuse in the AFDC, Medicaid, and Food Stamp programs.

USE OF STANDARDIZED FORMATS

Five of the responding states were concerned over the feasibility of the standardized format requirement for state agencies. This requires the use of standardized formats and procedures for the exchange of data within states and for interstate exchanges with programs. A single state believed that such formats would have been helpful if they had been available when the IEVS regulations were published. Among their concerns were the following:

- Standard format is clearly not cost-effective.
- New standard format is unworkable.
- Standard record formats should have been available when IEVS regulations were published so computer programming could have used this from the beginning and not have to reprogram later.

SAFEGUARDING OF FEDERAL TAX DATA

Four of the respondents voiced concerns over the stringent security guidelines required for some of the data the states will be using. Their comments included the following:

- One problem with the DEFRA requirements is the extremely stringent security guidelines applicable to both the IRS and SSA tax data.
- IRS security requirements limit possible data utilization.

- States should be allowed to treat IRS "hit" information as any other client data so special safeguarding is limited.
- Meeting safeguarding requirements is our primary concern with matching IRS information.

REQUIREMENTS TO TRACK AND
REPORT ON IEVS DATA

The cumbersomeness of the IEVS requirements to report and track data was a concern of four states. Among their comments were:

- The requirement that volume and usage of data be tracked is administratively cumbersome and costly. There would be a significant workload impact if it had to be compiled manually.
- The tracking and compiling of this data will be an administrative nightmare for all involved.
- To continue tracking applications is redundant and useless.
- Reporting requirements will not provide the information necessary to determine the cost-effectiveness of cross matches. Since states are prohibited from adjusting or deleting matches on the basis of cost-effectiveness, it is incumbent upon federal agencies to identify these unproductive matches and eliminate them from the requirements.

LACK OF FEDERAL AGENCY COORDINATION

The lack of coordination among federal agencies in implementing IEVS was a concern mentioned by three states. Examples of their comments were:

- Federal agencies should establish and document uniform guidelines, format, and programming specifications for all of the required matches.
- The federal agencies have failed to integrate their efforts. The states have an IEVS coordinator or coordinating group. Yet we have to deal with each federal agency separately. States had to submit waiver

requests to each agency, rather than to one central point. To get any questions answered, I have to speak to three agencies and either they do not have answers or their answers are conflicting.

LACK OF IEVS PILOT TESTING

Interchanges of data not being pilot tested was a concern mentioned by three states. Their comments included:

- No pilot testing was done to our knowledge.
- Federal agencies should pilot test the reports prior to requiring states to implement them.
- Each match, especially the IRS match, should have been piloted using IEVS guidelines, to determine value and work out problems so states would not need to independently develop, "de-bug," and implement systems to do the matches.

OTHER COMMENTS

One state suggested that extensive requirements, such as IEVS match requirements, should be phased in to allow both federal and state agencies to develop policies, procedures, and systems which are adequate to meet the spirit and intent of the law.

Another state commented that the consequent conditions placed upon the state in order to comply with DEFRA are frequently unreasonable and occasionally impossible. It stated:

"We strongly suggest that the regulations and law governing this system be reviewed in light of input from states and experience of the next several months. We believe that the system can be changed to make it flexible, reasonable and at the same time, effective."

STATE PROGRAM AND POPULATION STATISTICS

This appendix contains Food Stamp and Medicaid program statistics for fiscal year 1984 and AFDC statistics for fiscal year 1985 for the jurisdictions that were sent questionnaires. As a further convenience, we have included 1980 census population data for these same jurisdictions.

STATE PROGRAM AND POPULATION STATISTICS

(000 omitted for amounts and numbers)

State	General population ^a		Medicaid recipients in FY 1984 ^b		Medicaid benefits in FY 1984 ^b		Number of AFDC families in FY 1985 ^c		AFDC payments in FY 1985 ^c		Food Stamp recipients in FY 1984 ^d		Food Stamp issuances in FY 1984 ^d	
	Number	Pct.	Number	Pct.	Amount	Pct.	Number	Pct.	Amount	Pct.	Number	Pct.	Amount	Pct.
AL	3,894	1.7	316	1.5	\$ 366,328	1.1	52	1.4	\$ 70,642	0.5	624	3.0	\$ 319,464	3.0
AK	402	0.2	24	0.1	65,612	0.2	6	0.2	42,112	0.3	22	0.1	19,936	0.2
AZ	2,718	1.2		e		e	26	0.7	65,320	0.4	223	1.1	127,179	1.2
AR	2,286	1.0	193	0.9	325,756	1.0	22	0.6	41,251	0.3	295	1.4	138,042	1.3
CA	23,668	10.3	3,395	15.7	3,472,708	10.2	553	15.0	3,307,517	22.1	1,680	8.1	660,214	6.2
CO	2,890	1.3	155	0.7	290,179	0.9	28	0.8	100,195	0.7	181	0.9	93,257	0.9
CT	3,108	1.4	220	1.0	541,486	1.6	42	1.1	223,176	1.5	158	0.8	64,996	0.6
DE	594	0.3	47	0.2	67,989	0.2	9	0.2	26,430	0.2	45	0.2	24,407	0.2
DC	638	0.3	104	0.5	160,198	0.5	22	0.6	76,618	0.5	78	0.4	42,339	0.4
FL	9,746	4.2	572	2.6	740,046	2.2	97	2.6	247,918	1.7	699	3.4	379,164	3.5
GA	5,463	2.4	439	2.0	607,953	1.8	85	2.3	197,856	1.3	602	2.9	295,883	2.8
GU	106	0.0		f		f	2	0.1	4,560	0.0	22	0.1	18,553	0.2
HI	965	0.4	95	0.4	131,736	0.4	17	0.5	78,597	0.5	99	0.5	79,701	0.7
ID	944	0.4	37	0.2	68,418	0.2	6	0.2	19,183	0.1	63	0.3	36,563	0.3
IL	11,427	5.0	1,046	4.8	1,551,197	4.6	240	6.5	869,137	5.8	1,141	5.5	696,400	6.5
IN	5,490	2.4	272	1.3	642,012	1.9	57	1.5	153,233	1.0	451	2.2	253,582	2.4
LA	2,914	1.3	201	0.9	316,511	0.9	40	1.1	159,612	1.1	207	1.0	104,129	1.0
KS	2,364	1.0	146	0.7	244,979	0.7	23	0.6	85,080	0.6	130	0.6	67,433	0.6
KY	3,661	1.6	469	2.2	486,459	1.4	59	1.6	138,098	0.9	593	2.8	335,158	3.1
LA	4,206	1.8	382	1.8	682,246	2.0	76	2.1	154,102	1.0	612	2.9	323,335	3.0
ME	1,125	0.5	122	0.6	210,947	0.6	20	0.5	78,142	0.5	119	0.6	63,695	0.6
MD	4,217	1.8	324	1.5	494,199	1.5	66	1.8	241,319	1.6	302	1.5	169,027	1.6
MA	5,737	2.5	484	2.2	1,100,753	3.2	86	2.3	416,892	2.8	359	1.7	182,482	1.7
MI	9,262	4.0	1,155	5.3	1,574,044	4.6	225	6.1	1,197,887	8.0	1,072	5.1	580,007	5.4
MN	4,076	1.8	340	1.6	947,316	2.8	51	1.4	308,300	2.1	236	1.1	97,432	0.9
MS	2,521	1.1	302	1.4	307,469	0.9	52	1.4	60,699	0.4	509	2.4	257,701	2.4
MO	4,917	2.1	357	1.7	502,254	1.5	67	1.8	195,338	1.3	405	1.9	209,484	2.0
MT	787	0.3	47	0.2	92,957	0.3	8	0.2	32,107	0.2	58	0.3	29,312	0.3
NE	1,570	0.7	86	0.4	151,741	0.4	15	0.4	58,337	0.4	92	0.4	41,022	0.4
NV	800	0.3	27	0.1	65,249	0.2	5	0.1	11,689	0.1	34	0.2	21,101	0.2
NH	921	0.4	39	0.2	108,815	0.3	5	0.1	20,401	0.1	35	0.2	17,536	0.2
NJ	7,365	3.2	597	2.8	1,082,146	3.2	125	3.4	495,386	3.3	503	2.4	264,454	2.5
NM	1,303	0.6	83	0.4	128,686	0.4	18	0.5	51,124	0.3	163	0.8	85,547	0.8
NY	17,558	7.6	2,205	10.2	6,794,754	20.0	373	10.1	2,021,411	13.5	1,869	9.0	902,041	8.4
NC	5,882	2.6	340	1.6	605,732	1.8	64	1.7	160,891	1.1	506	2.4	237,968	2.2
ND	653	0.3	34	0.2	97,415	0.3	4	0.1	18,174	0.1	31	0.1	14,574	0.1
OH	10,798	4.7	1,015	4.7	1,613,303	4.8	224	6.1	759,927	5.1	1,166	5.6	676,041	6.3
OK	3,025	1.3	252	1.2	403,223	1.2	28	0.8	87,765	0.6	264	1.3	121,701	1.1
OR	2,633	1.1	139	0.6	221,901	0.7	28	0.8	106,461	0.7	231	1.1	138,958	1.3
PA	11,864	5.2	1,060	4.9	1,684,023	5.0	186	5.0	750,589	5.0	1,101	5.3	560,747	5.2
PR	3,197	1.4	1,607	7.4	123,021	0.4	54	1.5	62,953	0.4		g		g
RI	947	0.4	116	0.5	238,491	0.7	16	0.4	73,414	0.5	76	0.4	36,842	0.3
SC	3,122	1.4	231	1.1	287,729	0.8	44	1.2	89,481	0.6	400	1.9	201,698	1.9

STATE PROGRAM AND POPULATION STATISTICS

State	General population ^a		Medicaid recipients in FY 1984 ^b		Medicaid benefits in FY 1984 ^b		Number of AFDC families in FY 1985 ^c		AFDC payments in FY 1985 ^c		Food Stamp recipients in FY 1984 ^d		Food Stamp issuances in FY 1984 ^d	
	Number	Pct.	Number	Pct.	Amount	Pct.	Number	Pct.	Amount	Pct.	Number	Pct.	Amount	Pct.
SD	691	0.3	33	0.2	\$ 89,733	0.3	6	0.2	\$ 17,837	0.1	48	0.2	\$ 24,335	0.2
TN	4,591	2.0	345	1.6	540,170	1.6	57	1.5	89,344	0.6	563	2.7	289,576	2.7
TX	14,229	6.2	715	3.3	1,373,105	4.1	120	3.3	227,719	1.5	1,254	6.0	665,950	6.2
UT	1,461	0.6	69	0.3	112,368	0.3	13	0.4	50,797	0.3	76	0.4	39,433	0.4
VT	511	0.2	53	0.2	89,454	0.3	8	0.2	38,169	0.3	45	0.2	20,721	0.2
VI	97	0.0	14	0.1	3,953	0.0	1	0.0	2,781	0.0	36	0.2	24,125	0.2
VA	5,347	2.3	301	1.4	494,256	1.5	58	1.6	169,587	1.1	398	1.9	198,392	1.9
WA	4,132	1.8	301	1.4	501,479	1.5	65	1.8	331,851	2.2	279	1.3	135,128	1.3
WV	1,950	0.8	186	0.9	134,240	0.4	34	0.9	85,257	0.6	284	1.4	151,932	1.4
WI	4,706	2.0	491	2.3	931,686	2.7	96	2.6	556,381	3.7	361	1.7	141,315	1.3
WY	470	0.2	15	0.1	26,284	0.1	4	0.1	14,170	0.1	26	0.1	14,029	0.1
Tot.	229,949	100.0	21,598	100.0	\$33,894,709	100.0	3,688	100.0	\$14,943,217	100.0	20,826	100.0	\$10,694,041	100.0

^aSource: U.S. Department of Commerce, Bureau of the Census, 1980 Census of the Population, Vol. 1, Ch. A, Part 1.

^bSource: U.S. Department of Health and Human Services, Health Care Financing Administration.

^cSource: U.S. Department of Health and Human Services, Office of Family Assistance.

^dSource: U.S. Department of Agriculture, Food and Nutrition Service.

^eProgram nonparticipant.

^fData not available.

^gProgram is under a block group in Puerto Rico. Comparable data are not available.

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