November 2026

Public Digital Infrastructure for a Safety Net That Delivers

What One Administration Can Build

By Ivana Ng

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About the Author

Ivana Ng is a product strategist working to modernize income verification for public benefits and strengthen the government safety net. She formerly served as a senior advisor for technology and delivery at the US Department of Agriculture (USDA), where she advised senior leadership on digital service delivery and modernization initiatives. In that role, she advanced a department-wide strategy to overhaul the digital infrastructure of its loan programs, supported implementation of the Discrimination Financial Assistance Program established under Section 22007 of the Inflation Reduction Act of 2022, and oversaw the Farm Service Agency's annual IT budget. Prior to joining USDA, Ivana was vice president of product management at Nava PBC, where she worked with federal, state, and local government agencies to make critical government services work better for the people they're meant to serve—including working on the technology foundation behind many of Medicare and Medicaid's digital services.

Acknowledgments

This paper is built upon the collective wisdom, empirical research, and hard-won operational insights of dozens of scholars, technologists, legal experts, civic tech practitioners, and public servants. The author expresses her deepest gratitude to the institutions and research organizations whose groundbreaking work provided the foundational evidence, frameworks, and data that make this road map possible, including:

Axiom Foundation
Becker Friedman Institute for Economics at UChicago
Better Government Lab at Georgetown University
Center for Democracy and Technology
Center on Budget and Policy Priorities
Citizens for Responsibility and Ethics in Washington
Code for America
Collaborative Research Center for Resilience
Columbia World Projects
Consumer Financial Protection Bureau
Data Foundation
Democracy Forward
Digital Public Works
Economic Security Project
Empowering Democracy Initiative
Federation of American Scientists
Foundation for American Innovation
Georgetown University's Beeck Center for Social Impact + Innovation
Government Renewal Project
GSA 18F
Institute for Responsive Government
Institute for Women's Policy Research
IRS Direct File Team
KFF
Law and Policy Economy Project

Linda Miller of GovIntegrity
New America's New Practice Lab
Niskanen Center
Reconstructing Democracy Project
Recoding America
Roosevelt Institute
Searchlight Institute
Tax Policy Center
Tech Viaduct
TechTonic Justice
US Digital Service
UC Berkeley School of Information (Executive Fellowship in Applied Technology Policy)
University of Michigan (Gerald R. Ford School of Public Policy & Poverty Solutions)
Urban Institute
Vanderbilt Policy Accelerator

The author also convened an unconference in August 2026, bringing together researchers, technologists, advocates, and current and former government officials to think through what a more user-friendly, automated social safety net could look like. Conversations that day sparked or sharpened many of the ideas, precedents, and provocations in this paper, and the author is deeply grateful to everyone who traveled, thought out loud, and pushed back in that space.

Lastly, the author is grateful to many individuals for their time, willingness to share their expertise and ideas, and feedback—this paper is much stronger for it! Thank you, Larry Bafundo, Marisa Bremer, Stephanie Burdick, Jacky Chang, Hannah Garden-Monheit, Alexander Hertel-Fernandez, Sophie Jacobson, Suzanne Kahn, Anunay Kulshrestha, Annie Lowrey, Clarence Okoh, Gnora Mahs, Jonathan Mayer, Erie Meyer, Leya Mohsin, David Myers, Marina Nitze, Amy Paris, Rebecca Piazza, Reed Showalter, Loren Schulman, Misu Tasnim, Abiah Weaver, Rebecca Williams, Elizabeth Wilkins, and Allison Zelman.

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Chapter 1: A Systemic Failure to Deliver on Legislative Promises

Congress develops programs and passes laws in order to advance the American dream, but the delivery of those programs has demonstrated a common pattern of failure. The systems built to verify who's eligible can end up costing more than the aid those programs are designed to deliver. For example, from 2020 to 2025, Georgia spent more than twice as much verifying Medicaid enrollees' compliance with its eligibility rules as it spent on the actual healthcare benefits.[1] The bulk of that spending, $45.1 million, went to a single outside contractor to make changes to the state's eligibility and enrollment systems.[2] The same imbalance shows up in other government benefits programs. For example, as of 2019, at least 13 states screen Temporary Assistance for Needy Families (TANF) applicants for illicit drug use, spending millions of dollars to implement that screening despite catching almost no one.[3]

Today, this same pattern is playing out in how states are responding to H.R. 1, the harmful 2025 Republican reconciliation law known colloquially as the One Big Beautiful Bill Act. The bill institutes new cost-sharing penalties for Supplemental Nutrition Assistance Program (SNAP). House Committee on Agriculture Chair Glenn "GT" Thompson (R-PA) argues that giving states "skin in the game" will make them "administer the program more effectively for those it serves," invoking the specter of fraud that gets raised every time a new verification requirement or documentation burden is proposed.[4] In reality, the measurement H.R. 1 uses to penalize states doesn't measure fraud—it's actually a statistically volatile measure of what often comes down to honest mistakes: caseworkers miscalculating eligibility or benefit amounts, or genuinely eligible applicants tripped up by SNAP's own complicated rules.[5] Those

[1] Margaret Coker, "Georgia's Medicaid Work Requirement Program Spent Twice as Much on Administrative Costs as on Health Care, GAO Says," *ProPublica*, September 24, 2025, https://propublica.org/article/georgia-pathways-medicaid-work-requirement-gao-report.
[2] US Government Accountability Office, *Medicaid Demonstrations: Information on Administrative Spending for Georgia Work Requirements*, GAO-25-108160, September 3, 2025, https://gao.gov/assets/gao-25-108160.pdf.
[3] Darrel Thompson, "Drug Testing and Public Assistance," CLASP, February 5, 2019, https://clasp.org/publications/report/brief/drug-testing-and-public-assistance; Amanda Michelle Gomez and Josh Israel. "What 13 States Discovered After Spending Hundreds of Thousands Drug Testing the Poor," *ThinkProgress*, April 26, 2019, https://archive.thinkprogress.org/states-cost-drug-screening-testing-tanf-applicants-welfare-2018-results-data-0fe9649fa0f8.
[4] Glenn Thompson, "Thompson Opening Statement at Budget Reconciliation Markup," House Committee on Agriculture, May 13, 2025, https://agriculture.house.gov/news/documentsingle.aspx?DocumentID=7912.
[5] Lauren Bauer and Diane Whitmore Schanzenbach, "The SNAP State Cost-Shift Policy Leaves the Program's Existence to Chance," Brookings Institution, August 25, 2026, https://brookings.edu/articles/the-snap-state-cost-shift-policy-leaves-the-programs-existence-to-chance; American Public Human Services Association, "What to Know About the SNAP Payment Error Rate," June 2026, https://aphsa.org/wp-content/uploads/2026/06/2026-06_APHSA-What-to-know-about-the-SNAP-PER.pdf.

mistakes are a symptom of program complexity and outdated IT systems. In fact, this metric does not capture many of the most common forms of SNAP fraud, such as electronic benefits transfer (EBT) card skimming or retailer trafficking, where a store exchanges SNAP benefits for cash below their value and pockets the difference.[6] Because of the cost of the H.R.1 penalties, the Congressional Budget Office projects that some states will choose to stop offering SNAP altogether.[7] Many states are responding to H.R.1 by building more overhead (verification software, asking for more documentation, etc.) and placing more administrative burden on the people the program is intended to serve.[8] That added burden doesn't catch the main sources of actual fraud, though. EBT skimming and trafficking require better card security and law enforcement, not more paperwork from applicants. What that burden does instead is prevent eligible people from getting the benefits they're entitled to. This is a category of waste in government that gets far too little attention—dollars spent on administrative overhead and outside contractors instead of getting food to the people the program exists to feed.

Rather than delivering economic relief automatically to those who are eligible, the American safety net largely operates on an opt-in model that imposes what journalist Annie Lowrey has called a "time tax" on the public—the cumulative hours, paperwork, and psychological strain required for someone to receive a benefit they are legally entitled to.[9] The federal government estimates that Americans spend 12 billion hours a year filling out paperwork, representing an uncompensated labor cost of $430 billion annually.[10] The IRS's own Direct File program, a free tax-filing software, gives us a preview of what addressing this time tax could do. At full maturity, that program would have saved Americans $11 billion a year in combined filing fees and time costs, and unlocked an additional $12 billion annually in tax credits that go undelivered to eligible households.[11]

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[6] Aimee Picchi, "The Trump Administration Says the Food Stamp Program Is Rife with Fraud and Waste. Is It?," CBS News, updated June 29, 2026, https://cbsnews.com/news/snap-payment-errors-food-stamps-fraud-2026; US Government Accountability Office (GAO), *SNAP EBT Card Security* (GAO, 2025), GAO-25-107964, https://gao.gov/assets/gao-25-107964.pdf; US GAO, *Improper Payments: USDA's Oversight of the Supplemental Nutrition Assistance Program* (GAO, 2024), GAO-24-107461, https://gao.gov/products/gao-24-107461.

[7] Congressional Budget Office, *Supplemental Information: Estimated Effects of Public Law 119-21 on Participation and Benefits under the Supplemental Nutrition Assistance Program*, August 11, 2025, https://cbo.gov/system/files/2025-08/61367-SNAP.pdf.

[8] Gina Plata-Nino, "A Backgrounder on SNAP Quality Control, Payment Error Rates and Tolerance Threshold, and Cost-Sharing," Food Research & Action Center, updated June 18, 2026, https://frac.org/blog/a-backgrounder-on-snap-quality-control-payment-error-rates-and-cost-sharing.

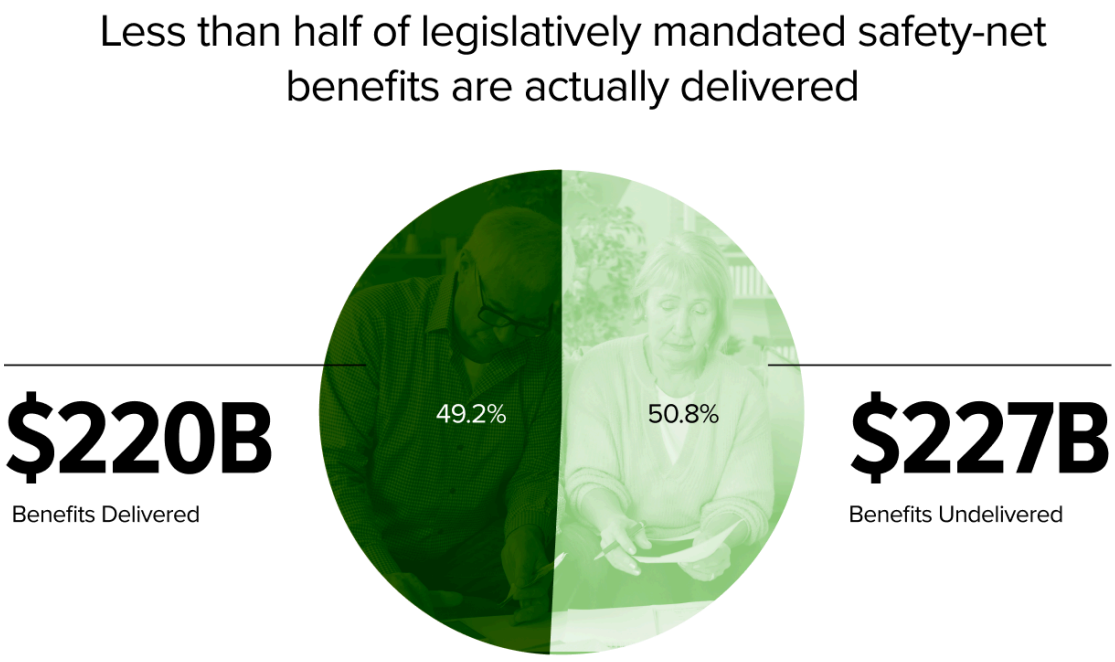
[9] Annie Lowrey, "The Time Tax," *The Atlantic*, July 27, 2021, https://theatlantic.com/politics/archive/2021/07/how-government-learned-waste-your-time-tax/619568; see also Annie Lowrey, *The Time Tax: How the Government Wastes Our Time—and How to Fix It* (Ecco, 2026).

[10] Lowrey, *Time Tax*, 10.

[11] Gabriel Zucker and Bharat Ramamurti, *The Impact of Direct File—by the Numbers* (Economic Security Project, March 11, 2024), https://economicsecurityproject.org/resource/direct-file-report.

By one estimate, over $227 billion in government safety-net benefits already authorized by Congress go undelivered annually.[12] Around 5 million eligible Americans do not receive the Earned Income Tax Credit (EITC), resulting in $7 billion of lost benefits every year.[13] In 2022, approximately 15 million people went without health insurance despite being eligible for free or subsidized coverage through Medicaid or the Affordable Care Act Marketplace. These gaps in enrollment represent a systemic failure to deliver on legislative promises.

Figure 1



Alleviating the time tax in our safety net programs has been empirically proven to reduce mortality and protect human life.[14] The consequences of our government's inability to lift administrative barriers are catastrophic. This was made abundantly clear during the post-pandemic Medicaid "unwinding," the mass eligibility recheck that

[12] Linda Giannarelli et al., *A Safety Net with 100 Percent Participation: How Much Would Benefits Increase and Poverty Decline?* (Urban Institute, 2023), https://urban.org/research/publication/safety-net-100-percent-participation.
[13] Gabriel Scheffler, Ariel Jurow Kleiman, and Andrew Hammond, "Automating the Safety Net," working paper, SSRN, June 11, 2026, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=6920559.
[14] Tracee Saunders et al., "Burden Reduction in a Social Safety Net Program Reduces Mortality," preprint, OSF Preprints, April 2, 2025, https://doi.org/10.31219/osf.io/xg7rw_v1.

began in 2023, after a pandemic-era rule that had let people stay continuously enrolled without re-proving their eligibility ended. Tasked with redetermining Medicaid eligibility for approximately 90 million enrollees all at once, state agencies struggled to update their systems and processes to meet the need. An estimated 7 million people lost health coverage, and 70 percent of those people were disenrolled due to missed paperwork or glitchy software systems.[15] The gap between eligibility and enrollment is not inevitable. It is a political and operational choice—and an expensive one to boot, paid not only in millions of lives affected but also hundreds of billions of dollars.

A Better World Is Possible

This paper starts from the premise that the government should fully deliver the commitments it has made under its economic relief programs. Congress has already enacted benefits and services that Americans are entitled to: food assistance, health coverage, childcare support, unemployment insurance, tax credits, and more. People deserve an administration that respects their time and dignity. Eliminating needless paperwork and onerous requirements that restrict people's movements and how they live their life is the difference between a program that exists on paper and a program that people actually experience. As the Roosevelt Institute has previously explained, modernizing government and abolishing needless paperwork must be a core principle for a reimagined federal government that proves to the American people that democracy can still deliver.[16]

This means striving for 100 percent take-up (the percentage of eligible people enrolled) in these programs, delivering the $227 billion of undelivered benefits into the pockets of the people who have a right to them. When Congress establishes by statute who is eligible for a program, it should hold the executive branch accountable for executing that program in a way that actually delivers relief to those statutorily eligible people. Take-up, or uptake, used interchangeably in this paper, is how we measure this. Preventing fraud is an equally legitimate goal, because every dollar that goes to fraud is a dollar diverted from the eligible people these programs are meant to serve. The federal government's goal must be to pursue both together: economic relief programs that deliver fast relief, zero paperwork, and maximal take-up, and systems that are structurally resistant to authoritarian misuse and actual fraud.

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[15] Luke Ferrell, Pamela Herd, and Donald Moynihan, "Code Is Policy: How the US Digital Service Helped States Increase Medicaid Coverage via Automation," working paper, 2026, https://drive.google.com/file/d/1F-Oh5BgZFwEp42STEgX1jXDNsWWX2UnR.

[16] Hannah Garden-Monheit and Tresa Joseph, *Building a More Effective, Responsive Government: Lessons Learned from the Biden-Harris Administration* (Roosevelt Institute, 2025), "Modernize Government and Abolish Needless Paperwork," https://rooseveltinstitute.org/publications/building-a-more-effective-responsive-government/#chapter-6.

Toward a More Automated Safety Net

Automatic enrollment, in its current form, usually activates only when someone has already applied to a different program that triggers it. The government safety net should shift from a system where people have to find their way to the program to one where the programs find them. Agencies should fully verify a person's eligibility using data that already exists across the government data ecosystem, and enroll them and notify them at the same time. In situations where auto-enrollment could potentially cause harm (see Chapter 6), the agency should proactively notify them of what they're likely eligible for, walk them through what is required to confirm eligibility, and give them the opportunity to affirmatively opt in.

Pieces of this vision already exist, just not everywhere and not for everyone. Anyone already receiving Social Security retirement benefits is automatically enrolled in Medicare Part A and Part B the moment they become eligible, no application required. Thirty-four states already extend Medicaid automatically to Supplemental Security Income recipients the moment the Social Security Administration approves their application, no separate Medicaid application required.

The 2021 Advance Child Tax Credit (CTC) further proves that this is achievable. For families who had already filed a recent tax return, the IRS used the income and dependents data it had on file to determine eligibility and automatically deposit monthly advance payments, no separate application required.[17] To reach the lowest-income families, the ones with no filing obligation but the most to gain from the Advance CTC, the IRS and Treasury built and promoted a simplified non-filer sign-up tool, which helped more than 100,000 families claim nearly $400 million.[18] The IRS also mailed letters to over 9 million families that it had identified, using W-2 and 1099 data it already had, as likely eligible non-filers, telling them about the Advance CTC and how they could claim it.[19] This proactive approach is the model the safety net as a whole should strive for.

[17] Internal Revenue Service, "2021 Child Tax Credit and Advance Child Tax Credit Payments: Resources and Guidance," last modified August 4, 2026, https://irs.gov/newsroom/2021-child-tax-credit-and-advance-child-tax-credit-payments-resources-and-guidance.
[18] Cole Wolf, "GetCTC Helped Thousands of Families This Tax Season. How Do We Help Even More Next Year?" Code for America, November 17, 2021, https://codeforamerica.org/news/getctc-2021-update.
[19] Internal Revenue Service, "IRS Sending Letters to Over 9 Million Potentially Eligible Families Who Did Not Claim Stimulus Payments, EITC, Child Tax Credit and Other Benefits; Free File to Stay Open until Nov. 17," news release IR-2022-178, October 13, 2022, https://irs.gov/newsroom/irs-sending-letters-to-over-9-million-potentially-eligible-families-who-did-not-claim-stimulus-payments-eitc-child-tax-credit-and-other-benefits-free-file-to-stay-open-until-nov-17.

The Time Is Now

Jennifer Anastasoff, a founding member of the US Digital Service and executive director of Tech Talent Project, recently observed: "The government is most open to change in two moments: crisis and transitions. The second has the characteristics of a crisis you can plan for—and it's an underused moment to bring about change."[20] Now is the time to be planful. We must lay the groundwork now, not after the next presidential election. This paper lays a foundation—for the policy leaders, technologists, and civil servants who will need to move fast once in office, and for the nonprofits, think tanks, advocacy groups, civic tech firms, community-based organizations, and government agencies already delivering economic relief programs—so that when a future pro-democracy governing moment arrives, the federal government can hit the ground running and rapidly deliver at scale the economic relief to which the American people are entitled.

The Path Forward

Here, we present a road map for what a future pro-democracy administration can do with existing authorities to make significant strides toward automated benefits and service delivery. This road map focuses on opportunities to better deploy existing authorities, not because the laws on the books are perfect—quite the contrary, the new impediments imposed by H.R. 1 are a moral failure—but rather to provide a baseline proposal for what is achievable even without further congressional action. It is informed by works such as *Building a More Effective, Responsive Government: Lessons Learned from the Biden-Harris Administration* (Roosevelt Institute, 2025) and other thought leadership in the field of government benefits and service delivery.

The road map is deliberately focused on what can be done in a single, four-year term without congressional action, but Chapter 7 includes recommendations for Congress as well—things that can make the gains resulting from this blueprint more durable and things that can make the social safety net more effective.

Done well, this road map can enable the federal government to deliver over $49 billion a year in economic relief to the people who qualify for it today, reach 18 million more people with the direct help they need to access it, and redirect over $6 billion a year away from commercial contracts and concentrated markets toward public infrastructure—ensuring that the people Congress intended to help actually receive that help.

[20] Jennifer Anastasoff, "Solid until It Isn't: Applying Lessons from Crises to Government Transitions," Tech Talent Project, August 24, 2026, https://techtalentproject.org/a-transition-is-a-planned-crisis.

Chapter 2: Failure Modes to Design Against

Why we don't have more automated benefits and service delivery today is complicated and could be its own dedicated paper.[21] This road map specifically addresses four failure modes.

Government Agencies Underutilize Existing Flexibilities in the Law

Many burden-reducing mechanisms are available to government agencies for specific circumstances and programs under current law, but states and programs apply them unevenly. These mechanisms remove steps from the process that drive the time tax that Americans experience when applying for and renewing benefits they qualify for, and they typically fall into three categories:

- **Eliminate the income/assets (aka "means") test.** A small number of programs, including Social Security and some states' school meals programs, don't check income at all. As an individual, you do not have to verify or prove your qualifications for the program. This is a form of universal eligibility.
- **Simplify verification.** For programs that are means-tested, several mechanisms enable an agency to reduce the paperwork burden on the applicant:
    - **Presumptive eligibility**: Temporary coverage starts immediately while the full determination is still pending. For example, the Social Security Administration pays up to six months of Supplemental Security Income (SSI) benefits to applicants with certain conditions before their disability claim is fully determined.
    - **Categorical eligibility**: Enrollment in one program satisfies another program's income test. For example, with SNAP's Broad-Based Categorical Eligibility process, if your household gets a noncash service funded by your state's TANF program (in some cases, this can be as simple as receiving a benefits brochure or a referral to a hotline), you're automatically treated as eligible for SNAP too, which means SNAP bypasses its own income/assets test and uses TANF's (usually higher) income limit. Another example: Enrolling in Medicaid, SNAP, or TANF automatically makes you income-eligible for Women, Infants, and Children (WIC) assistance, so WIC just needs proof you're in one of those programs rather than proof of your income.
    - **Direct certification**: Automatic enrollment, no application or paperwork required, based on another program's data. The classic example is free school meals. Every year, school districts match their enrollment list

[21] See Lowrey, *Time Tax*.

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against the state's SNAP records. Any student who shows up on both lists gets certified for free meals automatically, without the family having to fill out a form.
    - **Self certification/attestation**: The applicant's own signed statement is accepted for certain factors, no documentation required. Medicaid does this for certain facts, such as age and household size, without having you provide supporting documentation.
    - **Fact-specific proxies**: An easily verified fact substitutes for an individual check. The best-known example is the Community Eligibility Provision for school meals, using a school's poverty rate as the proxy to enroll the entire student population in free school meals.
    - ***Ex parte* renewal** (also called administrative, passive, or auto-renewal): Medicaid's term for renewing someone's coverage automatically using data the state already has on file, instead of making them fill out paperwork to prove they still qualify.
- **Change who has to act.** Opt-out enrollment instead of opt-in, where someone is enrolled automatically and would have to actively decline.

On paper, there are already many scenarios where a single enrollment in one program already establishes grounds for near-automatic enrollment in many other programs. For federally funded, state-administered programs, the federal government establishes flexibility like categorical eligibility but currently leaves it up to the state to choose how and when to apply it. For example, enrollment in SNAP or TANF triggers automatic or near-automatic eligibility for Medicaid, WIC, and the Low Income Home Energy Assistance Program (LIHEAP). Alabama and South Carolina already use SNAP or TANF data to fast-track Medicaid enrollment.[22] Forty-one states do the same to enroll newborns in WIC using a parent's Medicaid, SNAP, or TANF enrollment.[23] This is arguably the single biggest existing-authority lever to improve uptake, and yet it is not applied consistently across states.

Supplemental Security Income (SSI) enrollment triggers automatic eligibility for Medicaid, but only 34 states and DC use this lever.[24] Forty-six states have adopted some version of SNAP's Broad-Based Categorical Eligibility (BBCE) option, which allows states to automatically deem a household eligible for SNAP if it qualifies for a noncash TANF

[22] Centers for Medicare & Medicaid Services, "Express Lane Eligibility for Medicaid and CHIP Coverage," Medicaid.gov, last updated August 6, 2021, https://medicaid.gov/medicaid/enrollment-strategies/express-lane-eligibility-medicaid-and-chip-coverage.
[23] Zoë Neuberger, "WIC State Agencies Continue to Use Federal Flexibility to Streamline Enrollment," Center on Budget and Policy Priorities, updated December 19, 2024, https://cbpp.org/research/food-assistance/wic-state-agencies-continue-to-use-federal-flexibility-to-streamline.
[24] Social Security Administration, "SI 01715.010 Medicaid and the Supplemental Security Income (SSI) Program," Program Operations Manual System, updated September 30, 2026, https://secure.ssa.gov/poms.nsf/lnx/0501715010.

or state maintenance of effort–funded benefit.[25] All of these represent different versions of states underutilizing existing burden-reducing mechanisms.

One reason this unevenness persists is that nobody knows the full extent of what's legally permissible. In recent years, a group of state officials working with the National Governors Association set out to catalog actions they wanted to take to better coordinate programs, but had assumed federal rules prohibit. To their surprise, it turned out states could already do a large share of what they had documented under existing law.[26] Using these flexibilities currently takes real technical expertise across an array of federal rules and guidance covering disparate programs, plus the skill to assemble a coordinated package of state options and waivers that span them. Federal officials tend to know their own agency's program in depth but not the details of others; state officials face the same problem.

Expertise isn't the only thing standing between agencies and full use of these mechanisms. For a program like Medicaid, where the state and the federal government share the costs for every enrollee's coverage, adopting the mechanisms that maximize uptake also raises the state's own costs. A parallel version of that issue is now opening up in SNAP as well. Chapter 6 discusses this fiscal challenge in depth.

Agency Incentives Are Out of Balance

Agencies operate under a dual mandate: They must deliver services and be stewards of those services, ensuring public funds reach only eligible recipients and preventing fraud. Over time, the anti-fraud side of that mandate has become much more defined, with clear rules, hard deadlines, and real consequences for falling short. Take-up, by contrast, is rarely measured with the same rigor, and almost never carries consequences when agencies fall short. Given that asymmetry, it's not surprising that fighting fraud wins out in practice, even at agencies that genuinely want to provide low-friction services to everyone who is entitled to them.

None of this is an argument against program integrity, which matters enormously in its own right. The unemployment insurance fraud that flooded the system during the pandemic didn't just waste money; it did lasting damage to public confidence in that program. To be clear, the failure mode isn't that integrity matters too much. It's that the government has no comparably serious mechanisms for making take-up matter.

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[25] US Department of Agriculture, Food and Nutrition Administration, "Broad-Based Categorical Eligibility (BBCE)," last modified June 29, 2026, https://fna.usda.gov/snap/broad-based-categorical-eligibility.
[26] Robert Greenstein, "Examining the Safety Net," testimony before the House Committee on Ways and Means, Center on Budget and Policy Priorities, November 3, 2015, https://cbpp.org/research/poverty-and-inequality/examining-the-safety-net.



Lack of Public Option Digital Infrastructure, and the Resulting Vendor Lock-In

The third failure mode explains, in part, why agencies default to asking people to prove things that they or other government agencies already know—even though federal law technically requires agencies to avoid exactly this.[27] Almost every benefits program goes through the work of verifying a person's identity and income. In the absence of public option digital infrastructure—publicly owned, publicly maintained technology components that agencies can use instead of building their own—government agencies have outsourced these functions to commercial products and contractors.

Federal and state government agencies together spend nearly a billion dollars annually paying Equifax for income data that they could instead get from their state unemployment insurance program.[28] Government websites outsource identity verification to vendors like ID.me and CLEAR. Georgia paid Deloitte more than $51 million to make changes to the state's Medicaid eligibility and enrollment systems, resulting in a platform so unreliable that one applicant watched her submitted file disappear three times—and then the state paid Deloitte $27 million more to market that broken system to the public.[29]

The lack of public option solutions leaves every government agency to negotiate and pay the same handful of commercial vendors repeatedly and separately for the same basic building blocks that every government program requires. Reliance on privately owned, for-profit vendors for governmental digital infrastructure services too often results in a gross misuse of taxpayer dollars and forces the government to buy subpar products and services. Back in 2022, ID.me's facial recognition–based identity verification drew scrutiny for racial bias in its matching accuracy,[30] yet it remains prevalent on government websites. Equifax, the same company behind one of the largest consumer data breaches in US history, has used its market position with its product, The Work Number, to double its prices on the states and agencies that depend

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[27] Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 109 Stat. 163 (codified as amended at 44 U.S.C. § 3506(c)(3)(B)); S. 244, 104th Cong. (1995), https://congress.gov/bill/104th-congress/senate-bill/244/text/pl.

[28] Luke Ferrell, "The Means-Testing Industrial Complex," LPE Project, January 28, 2026, https://lpeproject.org/blog/the-means-testing-industrial-complex; Hannah Garden-Monheit et al., "Modern Income Verification: High-Tech Integrity, Low-Cost Delivery," Institute for Responsive Government, May 5, 2026, https://responsivegov.org/research/modern-income-verification-high-tech-integrity-low-cost-delivery.

[29] Margaret Coker, "The Firm Running Georgia's Struggling Medicaid Experiment Was Also Paid Millions to Sell It to the Public," *ProPublica*, May 14, 2025, https://propublica.org/article/deloitte-georgia-medicaid-work-requirement-pathways-campaign; Coker, "Georgia's Medicaid Work Requirement Program."

[30] Jay Stanley and Olga Akselrod, "Three Key Problems with the Government's Use of a Flawed Facial Recognition Service," American Civil Liberties Union, February 2, 2022, https://aclu.org/news/privacy-technology/three-key-problems-with-the-governments-use-of-a-flawed-facial-recognition-service.

on it.[31] Equifax has also allegedly used exclusivity agreements and acquisitions to prevent competitors from offering income verification services and to monopolize the income verification market.[32] Ironically, most of the underlying wage data that The Work Number sells to the government already exists inside the government, but the government's version of the data is often too stale and siloed to be used for income verification purposes under existing programs' terms. Specifically, employers report that data to state unemployment agencies every quarter, and you report your income to the IRS every year when you file your taxes. Yet benefits programs often need more recent income information. The government is essentially paying a private intermediary to get faster, more timely access to data the government already collects.

Concentrated private markets with no public option make accountability hard, because agencies have no leverage to walk away from the for-profit vendors and consulting firms that sell these products, and no independent benchmark to judge whether what they're paying for is actually reasonable.[33] Data privacy and consumer protection statutes do apply to private vendors, and government contracts can and should hold them to high standards. But accountability for a private vendor is far more attenuated than accountability for a public agency handling the same data directly. First, the government doesn't always have the capacity or expertise to know what is happening inside a vendor-built system, and oversight bodies often lack the technical expertise to evaluate these systems. Moreover, enforcement against a vendor is often discretionary and complaint-driven rather than continuous.[34] And when the government buys a commercial, off-the-shelf product rather than commissioning custom software it owns, it doesn't control the underlying architecture. To some extent, the government must adapt its own requirements to what the vendor's product already does. Custom-built, government-owned software offers more control, but even that isn't bulletproof. Both parties can renegotiate the contract governing the vendor relationship, custom-built or not, at will.

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[31] Sarah Kliff, Margot Sanger-Katz and Asmaa Elkeurti, "'A Big Positive': How One Company Plans to Profit from Medicaid Cuts," *New York Times*, November 3, 2025, https://nytimes.com/2025/11/03/health/medicaid-cuts-equifax-data.html; Sarah Kliff, Margot Sanger-Katz and Asmaa Elkeurti, "Senators Accuse Equifax of 'Price-Gouging' Medicaid Programs," *New York Times*, February 4, 2026, https://nytimes.com/2026/02/04/health/equifax-medicaid-states-senators.html.

[32] Mike Scarcella, "Equifax Must Face Antitrust Lawsuit over Verification Services," Reuters, February 18, 2025, https://reuters.com/legal/litigation/equifax-must-face-antitrust-lawsuit-over-verification-services-2025-02-18.

[33] Ganesh Sitaraman and Anne L. Alstott, *The Public Option: How to Expand Freedom, Increase Opportunity, and Promote Equality* (Harvard University Press, 2019), https://doi.org/10.2307/j.ctv2d8qx28.

[34] For an all-too-rare instance of government holding data brokers accountable for legal violations, see Consumer Financial Protection Bureau, "CFPB Orders Equifax to Pay $15 Million for Improper Investigations of Credit Reporting Errors," press release, January 17, 2025, https://consumerfinance.gov/archive/newsroom/cfpb-orders-equifax-to-pay-15-million-for-improper-investigations-of-credit-reporting-errors.

Overreliance on private market companies to provide digital infrastructure for government benefits has fundamentally failed taxpayers and also the social safety net that we all expect our government to provide. As Jamie Keene writes in *From Safety Net to Power Base* for the Roosevelt Institute, "Extensive corporate capture of the safety net means that public investments intended to reach people at the bottom of our economy in fact circulate upward to concentrated corporate actors."[35] This too is government waste. Keene concludes that investing in public options is an essential pillar to ending poverty. Chapter 4 outlines a vision for a public option digital infrastructure platform—shared, open, reusable code and components built once and made available to government agencies at all levels. This gives government agencies leverage they don't have today, and forces every private vendor and consulting firm that wants to keep the government as a customer to compete to offer equal or better quality and pricing.[36]

Low Capacity to Build, Adopt, and Deliver Services

Over the course of 2025, the Trump administration cut more than 317,000 federal government jobs, resulting in a net 10.8 percent decrease after accounting for new hires.[37] Some of the hardest-hit agencies are the ones that our road map tasks with implementation—the IRS, which had developed and owned Direct File and administers refundable tax credits, lost 25 percent of its staff; the US Department of Agriculture (USDA), which administers SNAP and WIC, lost 22 percent; and the Social Security Administration, which runs Supplemental Security Income, has cut 7,000 jobs and shut down six regional offices.[38] The administration that takes on the job of building what this paper proposes will be starting with fewer people, less institutional memory, and a smaller in-house technical bench than existed just a few years prior.

This is playing out in real time. In a 2025 survey, state Medicaid agencies reported that they lack the staff and data-sharing infrastructure to layer new verification requirements while balancing multiyear modernization initiatives, and described having to hire or reallocate staff to keep up with the new requirements, appeals, and outreach

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[35] Jamie Keene, *From Safety Net to Power Base: Reimagining, Not Restoring, the US Antipoverty System* (Roosevelt Institute, 2026), https://rooseveltinstitute.org/publications/from-safety-net-to-power-base.
[36] Erie Meyer and Margaret Mullins, "Digital State Capacity after the Age of DOGE," Vanderbilt Policy Accelerator, November 7, 2025, https://vanderbiltpolicyaccelerator.substack.com/p/digital-state-capacity-after-the-age-of-doge.
[37] Drew Friedman, "How Staffing Cuts in 2025 Transformed the Federal Workforce," *Federal News Network*, January 1, 2026, https://federalnewsnetwork.com/workforce/2026/01/how-staffing-cuts-in-2025-transformed-the-federal-workforce.
[38] Friedman, "Staffing Cuts in 2025"; Ashley Lopez and Jenna McLaughlin, "The Social Security Administration Says It Plans to Cut Some 7,000 Jobs," NPR, February 28, 2025, https://npr.org/2025/02/28/nx-s1-5296986/trump-worker-cuts-social-security-administration.

that H.R. 1 is generating.[39] This paper's road map requires that same scarce resource—the human capacity and the technical expertise to execute.

Capacity isn't only about head count, though. It's about know-how, and the two shortages compound each other. An agency without the proper in-house technical expertise pays exorbitant fees to outside contractors to build its eligibility and benefits administration systems, but lacks the expertise to know whether the contractor is actually delivering. The result is a government that is overpaying for capacity it doesn't have and unable to judge whether it's getting its money's worth.

The next administration will need to think about capacity more expansively. This looks like building real, resourced partnerships with Community Action Agencies, IRS Volunteer Income Tax Assistance (VITA) sites, public libraries, and community-based organizations that already have trusted relationships with the people their programs are trying to reach, which Chapter 4 describes in more detail.

Valiant Efforts, Shoulders to Stand On

There have been many valiant efforts to address these failure modes. This section highlights three of them, discusses how they got things right, and explains what lessons from them the road map incorporates.

Direct File. The IRS's free, government-built tax filing software showed that a public option can and should be just as good as any commercial product.[40] It started small, piloted in 12 states, iterated based on what it learned, and was built in the open. It earned customer approval numbers that even Silicon Valley products, let alone government services, rarely reach: 90 percent of users in Direct File's first pilot and 94 percent in the following filing season rated their experience as "Excellent" or "Above Average," and 86 percent said the experience increased their trust in the IRS.[41] Despite its glowing reviews, the Trump administration discontinued it in November 2025.[42]

The lesson here: The federal government can build strong public options that can compete in an open market with commercial providers, but a strong product is not

[39] Amaya Diana et al., "Challenges with Implementing Work Requirements: Findings from a Survey of State Medicaid Programs," KFF, October 31, 2025, https://kff.org/medicaid/challenges-with-implementing-work-requirements-findings-from-a-survey-of-state-medicaid-programs.
[40] The IRS Direct File team was supported by many skilled federal contractors, who acted as part of an integrated project team with government employees.
[41] Congress.gov, "The IRS Direct File Program," September 27, 2026, https://congress.gov/crs-product/IF13314; Internal Revenue Service, IRS Direct File Pilot Program: Filing Season 2024 After Action Report, Publication 5969 (5-2024), May 3, 2024, https://irs.gov/pub/irs-pdf/p5969.pdf.
[42] Fatima Hussein, "Trump Administration Plans to End the IRS Direct File Program for Free Tax Filing, AP Sources Say," Associated Press, April 17, 2025, https://apnews.com/article/irs-direct-file-tax-returns-free-trump-4bb0bca02fab9b3d06ae6f45ac67b7ab.

enough on its own. Every aspect of the infrastructure this paper proposes must be designed for resilience. The American people's access to the benefits and services they are entitled to can't fluctuate wildly every four to eight years.

Advance Child Tax Credit. The 2021 expanded, advance-paid Child Tax Credit (CTC) provides some of the strongest evidence available that automatic, no-paperwork delivery can work at scale. In 2021, the IRS automatically identified eligible taxpayers using existing data and disbursed advance payments of up to half of the CTC to them. This program had a significant macroeconomic impact, reducing the child poverty rate by half that year. However, the Biden administration was not able to extend the expanded tax credit, and the funding expired a year later.

The lesson here: Straightforward program delivery can alleviate a tremendous amount of human suffering. One law with no paperwork pulled half of American children out of poverty. That kind of impact needs to be made legible to the public, so that voters and lawmakers can see the return on investing in delivery. Any new administration must relentlessly pursue work at or above this level of ambition.

Login.gov. The federal government's own public option identity verification service has strong security, is well-engineered, and has been improved upon iteratively over years. What it hasn't achieved is universal adoption. Government agencies are still choosing ID.me and other commercial vendors at scale. Though Login.gov's own identity-proofing technology runs on commercial subcontractors like LexisNexis, the federal government owns the resulting product, contract, and accountability.[43] Building a good public option is necessary but not sufficient. A recent Office of Management and Budget (OMB) memo, published in August 2026, orders every federal agency to make Login.gov its default sign-on.[44] However, the mandate does not come with funding or staff to help agencies get onboard, and comes from the same administration that spent the prior year hollowing out the workforce needed to comply with this directive.

The lesson here: Public options require ongoing investment, not only in the product, but also in marketing, sales, change management, and customer acquisition. Adoption, not just building the thing, is the goal.

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[43] Joel R. McConvey, "LexisNexis wins $218M in Login.gov identity proofing awards," *Biometric News*, August 12, 2026, https://biometricupdate.com/202608/lexisnexis-wins-218m-in-login-gov-identity-proofing-awards.

[44] Russell T. Vought, Director, Office of Management and Budget, to Heads of Executive Departments and Agencies, Memorandum M-26-18, "Scaling Use of Login.gov to Deliver a Universal Sign-on for Public Services," August 31, 2026, https://whitehouse.gov/wp-content/uploads/2026/08/M-26-18-Scaling-Use-of-Login.gov-to-Deliver-a-Universal-Sign-on-for-Public-Services.pdf. The memo sets a two-year deadline for agencies to deploy Login.gov across public-facing websites that require sign-in, and requires an agency head to personally certify any exception to keep using a commercial alternative. Each agency is expected to cover the cost within its existing budget.

Chapter 3: Our Theory of Change

Each of the four failure modes above traces back to a different point of leverage: what agencies are legally allowed to do, what they're measured against, what they've built to support their mission, and who has the people and expertise to execute. The theory of change that drives this road map builds on four mutually reinforcing levers, all designed specifically to prevent an administration from falling back into any of these failure modes.

- **Policy**: Direct agencies to use the burden-reducing eligibility mechanisms already available to them in statute and regulation.

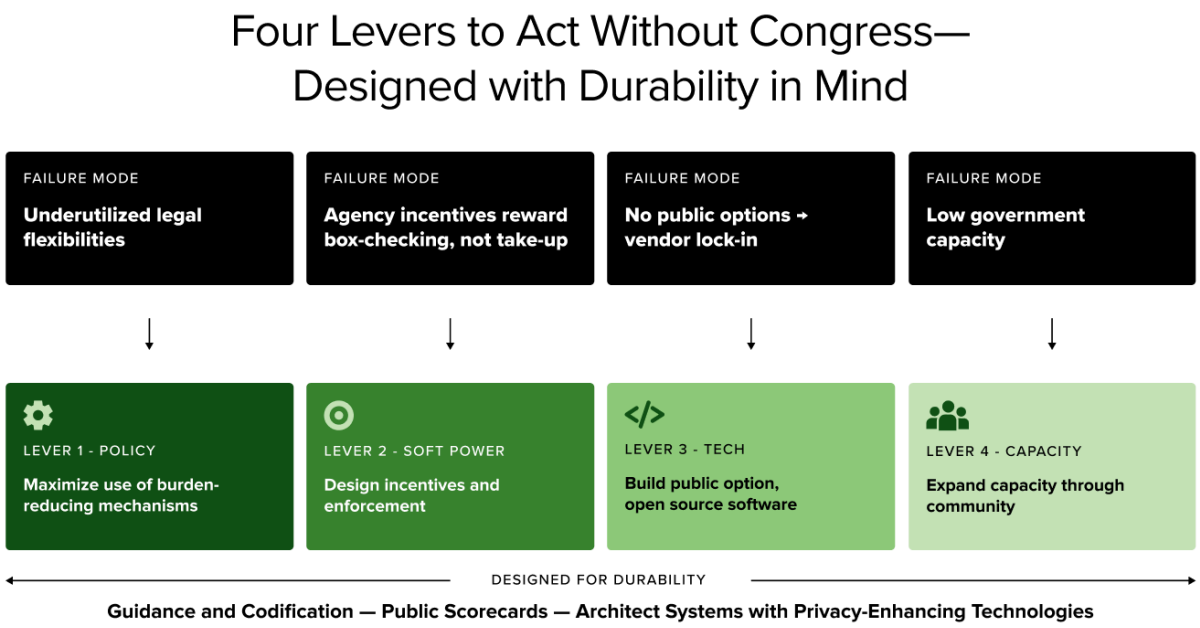
- **Incentives and enforcement**: Tie funding, administrative match dollars, and public accountability to take-up and cost-per-enrollment.

- **Public option, open source digital infrastructure**: Build publicly owned, open source alternatives that compete alongside the commercial options for identity verification, income verification, and other core services that government programs depend on. These should be held to explicit standards for accuracy, equity, and accountability so that they do not produce the same bias and accessibility issues that commercial ones often do. Open sourcing the code means any agency can inspect, reuse, and improve it instead of paying a vendor to build the same thing from scratch many times over, the way 25 states have separately paid Deloitte to build nearly identical Medicaid eligibility systems.

- **Capacity**: Take an expansive definition not just of system capacity but of human capacity to reach people where they are—through channels that they already trust.

Put together, the theory of change looks like this:

Figure 2



No single lever will work alone. The road map that follows describes what a new administration can do with each lever to reach toward 100 percent take-up, fast relief, and zero paperwork—all in a way that is designed to prevent fraud in the first place.

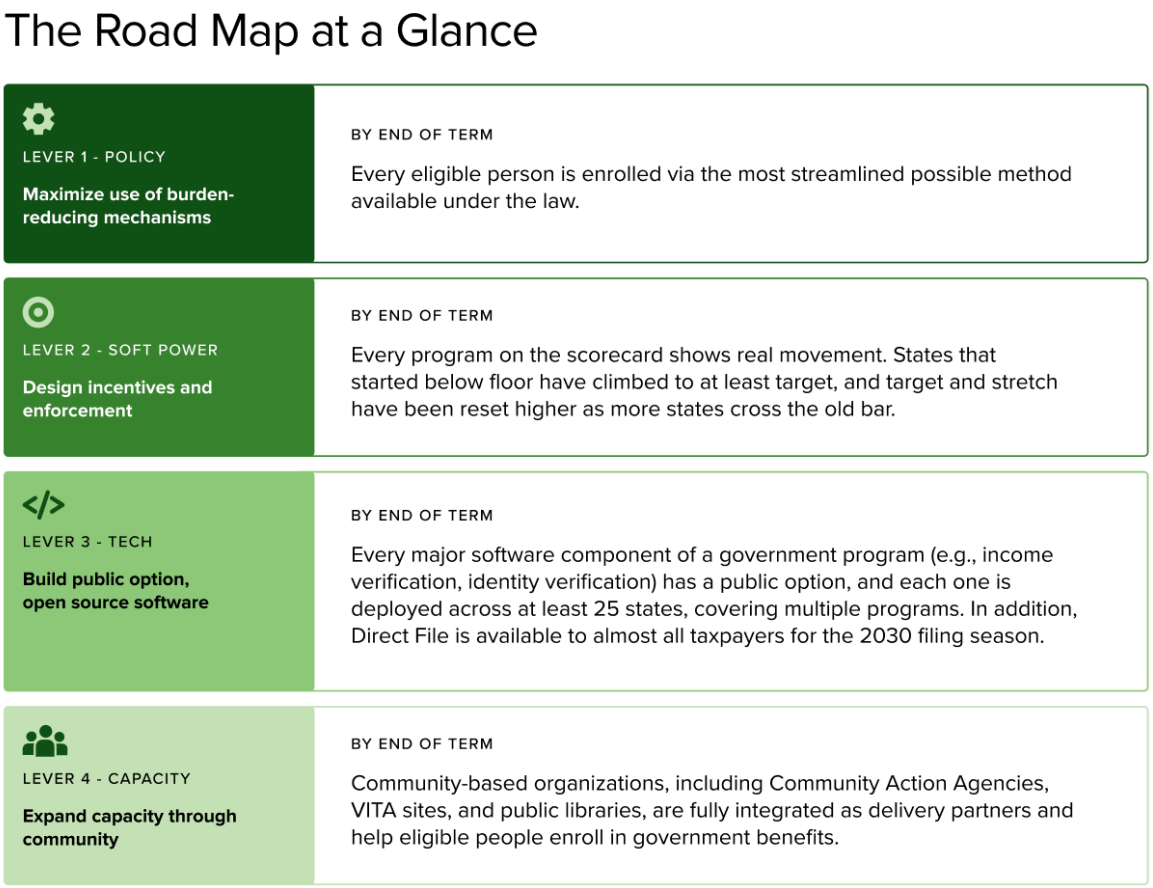
Durability Is the Through Line

Everything in this road map is designed to be achievable by a new administration in one four-year term, using existing authorities and requiring no congressional action. But the flip side of this is that almost every lever we are using can be reversed by the next administration. For each proposal in our road map, we name specifically how we can make it harder to reverse than to keep. For example, pursue codification of these changes while implementing them on Day 1 through guidance or rulemaking under existing authorities; create a public scorecard co-owned with statutorily independent bodies who can carry it forward regardless of who's in office; architect systems with privacy-enhancing technologies that get more durable and more competitive against commercial options the more agencies adopt them; and deliver benefits through local community organizations to build trust and power among constituents.[45]

[45] Rulemaking is no longer a path to durability, due to *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024). This case overturned the 40-year-old Chevron doctrine, which had required courts to defer to a federal agency's reasonable interpretation of an ambiguous statute it administers. In practice, this means a court can easily vacate or narrow an agency rule.

Chapter 4: The Road Map

Figure 3



Each item in the road map explains:

- What the proposal is, and the precedents it builds upon
- What authorities the administration can use to execute
- An action plan for Day 1, the first 100 Days, and what to aim to accomplish by the end of the term

Maximize the Burden-Reducing Eligibility Mechanisms Already on the Books

Oftentimes, government agencies make people fill out applications and provide documentation that are not actually required by federal law. This paperwork is an affirmative choice agencies make in the face of complex requirements and limited implementation support. Getting states to adopt mechanisms that they're already entitled to use requires two types of pushes: carrots that make adoption easier and more attractive, and sticks that make holding out costlier.

The actions below combine both carrots and sticks, within what current law allows: guidance, technical assistance, and safe-harbor implementations that lower the cost and risk of adopting a mechanism, paired with funding conditions and the public scorecard proposed in the next section, which put pressure on states that underperform.

Day 1 Actions

USDA and the Department of Health and Human Services (HHS) should issue a single, jointly signed sub-regulatory guidance document covering every mechanism outlined below and pushing all states to adopt them to the maximum extent possible. That guidance should include a "safe harbor" implementation for each mechanism—including model state plan language, a reference technical design, and sample consent and notice language—that a state can adopt wholesale, rather than designing its own approach from scratch and carrying the legal and political risk of getting it wrong.[46] The mechanisms are grouped below by types of assistance:

- Food
    - **Broad-Based Categorical Eligibility (BBCE) for SNAP.** This burden-reducing mechanism allows states to raise the income limit for SNAP—the maximum a household can earn and still qualify—and either raise or eliminate the asset test, which is the rule that can disqualify someone for having too much in savings or other property even if their income is low enough on its own. Dropping that test reduces the paperwork burden on applicants and makes more people eligible for SNAP. Today, seven states still have not adopted this.

      BBCE is currently under direct political threat. USDA submitted a proposed rule to the Office of Management and Budget (OMB) in October 2025 that would eliminate it, causing an estimated 6 million people to lose benefits.[47] Critics frame BBCE as a fraud loophole, claiming that

[46] Examples of safe harbor implementations:
- Biden administration guidance on how agencies can use Paperwork Reduction Act flexibilities to conduct ongoing usability testing: Richard L. Revesz, Administrator, Office of Information and Regulatory Affairs, to Heads of Executive Departments, Agencies, and Independent Regulatory Agencies, memorandum, "Supporting Usability Testing through Paperwork Reduction Act Flexibilities," November 21, 2024, https://bidenwhitehouse.archives.gov/wp-content/uploads/2024/11/PRA-Usability-Testing-Guidance-Memo.pdf
- Joint memo signed by multiple federal agencies committing to AI regulation: Consumer Financial Protection Bureau et al., "Joint Statement on Enforcement of Civil Rights, Fair Competition, Consumer Protection, and Equal Opportunity Laws in Automated Systems," April 4, 2024, https://justice.gov/archives/crt/media/1346821/dl.

[47] See regulation pending review at the Office of Management and Budget, https://reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=0584-AF10.

households with high levels of assets (e.g., savings, a car) are receiving benefits they don't deserve and that error rates are higher for the relatively small set of recipients who qualify under BBCE's higher income limit. But a higher error rate is not evidence of fraud, for the same reason established earlier in this paper. The error rate captures caseworker miscalculations and applicants tripped up by complicated rules, not actual fraud. If anything, BBCE eliminates an aspect of SNAP that is most prone to error. In states that still apply SNAP's asset test, mistakes related to accurately accounting for a household's assets add a full percentage point to the state's overall error rate.[48]

- **Adjunctive Eligibility for WIC.** The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides food assistance and nutrition support to pregnant women, new mothers, and young children from low-income households. State WIC agencies have the authority to treat someone's enrollment in another program as proof that they already qualify for WIC on income, so long as the other program already verified income and its income limit is at or below WIC's. This is known as "adjunctive eligibility," and federal law requires that this mechanism be applied to Medicaid, SNAP, or TANF.[49] For people already enrolled in one of these programs, the state WIC agency must treat their income as already verified, instead of asking them to submit income paperwork all over again. Federal law allows state WIC agencies to extend adjunctive eligibility to more state-run programs. The federal government should name specific additional programs, such as a state's general assistance program (cash aid for very low-income residents) and childcare subsidy program , rather than leaving it up to the states to decide.

- Healthcare
  - **Express Lane Eligibility (ELE) for Medicaid and the Children's Health Insurance Program (CHIP)**. This mechanism allows a state to enroll or renew a child in Medicaid or CHIP based on an income decision another program already made about that family, instead of the family having to prove their income all over again with an entirely new, separate application. In practice, if a family already qualifies for SNAP, TANF, Head Start (a preschool program for children from low-income families), free meals through the National School Lunch Program, or WIC—all of which already check a family's income to enroll them—the state can rely on that existing income check to enroll or renew the child in Medicaid or CHIP,

[48] Dottie Rosenbaum et al., "SNAP's "Broad-Based Categorical Eligibility" Supports Working Families, Older Adults, and Those Saving for the Future," Center on Budget and Policy Priorities, November 2, 2017, https://cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-older.
[49] 7 CFR 246.7(d)(2)(vi)(B). https://ecfr.gov/current/title-7/part-246/section-246.7#p-246.7(d)(2)(vi)(B).



without the family having to fill out a separate application and resubmit documentation. Today, only seven states participate.

- **Automatic enrollment in Medicaid for Supplemental Security Income (SSI) recipients.** SSI is a monthly cash benefit for people with disabilities and older adults who have little or no income or resources. Current law allows the Social Security Administration (SSA) to automatically enroll SSI applicants in Medicaid at the time of approval, with no extra paperwork. This automatic enrollment mechanism is used by 34 states and DC, operating under a "Section 1634" agreement. The 16 states that haven't made that agreement, known as the "209(b)" and "SSI criteria" states, make someone who's already been approved for SSI go through a whole separate Medicaid application and prove their income and eligibility again.
- **Automation of Medicaid administrative renewals.** The Centers for Medicare and Medicaid Services (CMS) should issue guidance and technical assistance directing state Medicaid agencies that automate less than 75 percent of administrative renewals to adopt the renewal-automation practices already tried and tested by the roughly 11 states at or above that threshold.[50]

Launch legislative push to codify the guidance outlined above.

USDA and HHS should condition a state's eligibility for existing discretionary funding streams, such as IT modernization matching dollars and technical assistance grants, on that state having adopted the relevant mechanisms outlined above. USDA's SNAP Process and Technology Improvement Grants, for example, distribute up to $5 million a year through a competitive process. This is a real, readily available lever that the administration can use as a carrot to motivate states to adopt Broad-Based Categorical Eligibility. Combined with the target and stretch goals from the public scorecard proposed in the next section, this gives non-adopting states both a reputational and financial reason to take action.

First 100 Days

CMS issues a technical-assistance tool kit, informed by the unwinding-era interventions designed in partnership with the US Digital Service (USDS), to states that are below the national median automated Medicaid administrative renewal rate.[51]

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[50] Tricia Brooks et al., "Medicaid and CHIP Eligibility, Enrollment, and Renewal Policies as States Resume Routine Operations Following the Unwinding of the Pandemic-Era Continuous Enrollment Provision," KFF, April 1, 2025, https://kff.org/medicaid/medicaid-and-chip-eligibility-enrollment-and-renewal-policies-as-states-resume-routine-operations-following-the-unwinding-of-the-pandemic-era-continuous-enrollment-provision.

[51] Pamela Herd et al., "Interventions to Automate Medicaid Renewals Reduce Procedural Denials and Increase Coverage," *Health Affairs* 44, no. 11 (2025): 1336–43, https://healthaffairs.org/doi/10.1377/hlthaff.2025.00316.

By End of Term

Every eligible person is enrolled through the most streamlined method available under current law—not incremental movement toward that goal, but as close to full utilization of every mechanism already legally available as an administration can plausibly deliver in one term.

- All seven remaining states adopt Broad-Based Categorical Eligibility, bringing every state plus DC to full adoption.
- States below the top quartile for automation of Medicaid administrative renewals are brought to at least 75 percent—bringing all states to the level that roughly 11 states have already proven is achievable.
- All 16 non-1634 states complete Section 1634 agreements, so that every state automatically enrolls SSI recipients in Medicaid with no separate application required.
- Express Lane Eligibility adoption triples—going from the 7 states that have implemented it today to at least 21 states.

Codification, including through legislation, would make these burden-reducing eligibility mechanisms more durable, but takes time and political capital, which is why launching legislative efforts is part of the Day 1 actions.

Invest in Public Messaging and Measurement of Uptake and Admin Overhead

You can't realign agency incentives without first making the thing you want agencies to be measured on visible. Right now, uptake and administrative overhead ratios are not published in a form anyone outside an agency can act on, so there are no public benchmarks, no comparison across states, and no way to hold an agency accountable. Measuring what we care about is the seed of the institutional change we need.

The Proposal

The federal government should publish state-by-state, program-by-program uptake numbers—i.e., show what percentage of the estimated eligible population for a given program is actually enrolled—and establish target benchmarks for each program. Data should go down to the most granular geography the underlying numbers can safely support, as long as no individual household can be reliably identified. This enables community organizations and implementers to understand with more granularity where to target outreach and other efforts to increase uptake.



The public reporting should also show where administrative dollars actually go—not just what share of program spending goes to administration instead of benefits delivery, but also what contractors are getting paid and how much. Not all administrative spending is bad. Building real in-house capacity (e.g., engineers on staff, public option tools that are built once and reused across the government, work done in the open in systems that the government actually owns rather than proprietary systems owned by contractors) is real overhead, but it is exactly what the government needs in order to deliver its programs and benefits more effectively.

What we don't want is administrative overhead that results in waste and just plain bad service—paying contractors to build systems that don't work, and then paying them more to fix their own mistakes. The real question isn't how much a program spends money on administration. It's who that money is going to, and whether it's driving the results that really matter—getting eligible people the benefits they're entitled to. There should be a public spotlight on this data for every state and every program. The Government Accountability Office (GAO) happened to audit Georgia's Pathways to Coverage Medicaid program, but it shouldn't take a one-off act of investigative labor to find this sort of government waste. This should be the norm. As the impacts of H.R. 1 are increasingly felt, Congress should be seizing the moment to shine a light on the real waste that is occurring writ-large.

The Precedents

The federal government already publishes scorecards similar to this proposal, but only for certain programs rather than a holistic comprehensive view. For example, the Center for Medicare and Medicaid Services's Medicaid and CHIP Scorecard publishes state-level metrics on how well states serve beneficiaries across key domains like postpartum care and well-child visits, and how states and the federal government work together to administer the two programs.[52] USDA publishes SNAP Quality Control (QC) payment error rates every June, state by state, split into overpayment and underpayment error. "Underpayment" currently counts only eligible households who were already enrolled and receiving some benefit but got less than they were owed, but does *not* count people who applied and were wrongly turned away or who were eligible but never got enrolled at all. USDA tracks denials and terminations separately, through a much less rigorous review, and that figure is not part of the metric that drives H.R. 1's cost-sharing penalty.

These scorecards share two blind spots. They do not get at the root cause behind their numbers, and they do not measure a program's failure to deliver relief to eligible people. USDA's SNAP QC report conflates errors due to fraud with the much more common set of errors that are due to caseworkers' processing mistakes and genuinely

[52] Centers for Medicare & Medicaid Services, "Medicaid and CHIP Scorecard," Medicaid.gov, accessed August 30, 2026, https://medicaid.gov/state-overviews/scorecard.

eligible applicants making honest mistakes due to the complicated requirements of the program.[53]

The government already publishes agency-by-agency and program-by-program financials on a recurring cycle, ranks agencies from best to worst performer, and makes the underlying data downloadable. The playbook is statutory mandate, recurring cadence, public ranking, and downloadable data.[54] This proposal to publish state-by-state and program-by-program data on eligible populations who are not enrolled and on administrative overhead ratios can be done under existing authorities, without new legislation. Recurring cadence of reporting, public ranking, and downloadable data would make this scorecard an invaluable anchor for a successful effort to increase uptake.

What Makes Our Proposal Different from What Exists Today

None of the existing public scorecards and datasets described above do what we are proposing. First, they do not measure uptake. PaymentAccuracy.gov, the CMS Scorecard, and SNAP QC all look only at the population that has already applied and been approved and ask: "Were this population's payments accurate and timely?" These data dashboards are not designed to answer: "Of everyone who is eligible for these services, how many actually receive it?"

A program can run with little to no error rate, while only a third of eligible households are enrolled. This measures only one type of error—false positive eligibility—but not the negative error of failing to deliver a statutory commitment of economic relief.[55] The existing dashboards do not show that impact on the individual and national level. It is standard practice for companies to measure the success of their products and services against market share and adoption rates. The government version of this is uptake, which measures whether the programs Congress has established are maximally getting to the people they are designed for.

Second, none of the existing systems measure administrative spend *relative to what it costs to deliver a program's actual purpose* or show where that spending is actually going. Administrative spending should be applied carefully and efficiently to fuel a

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[53] US Department of Agriculture, Food and Nutrition Administration, "SNAP Quality Control," last modified June 28, 2026, https://fna.usda.gov/snap/qc.

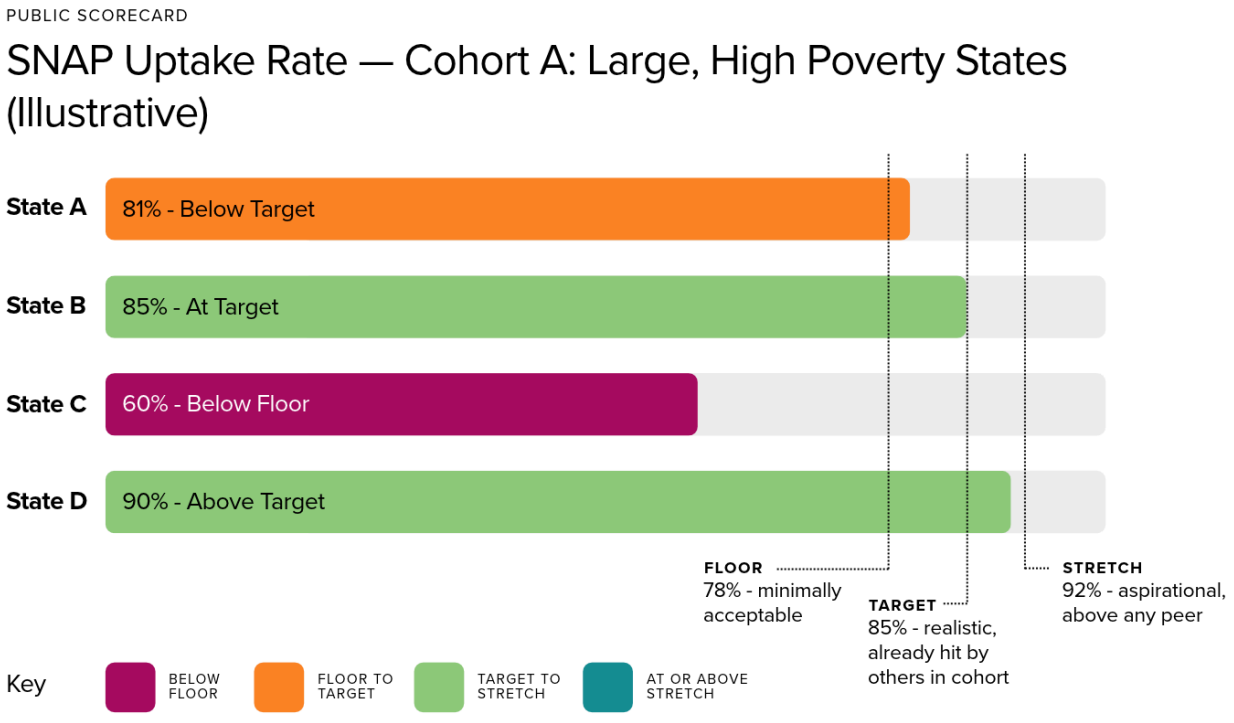
[54] PaymentAccuracy.gov, run by OMB under the statutory mandate of the Payment Integrity Information Act of 2019 (PIIA) (P.L. 116-117) and Appendix C to Circular No. A-123, *Requirements for Payment Integrity Improvement*.

[55] This type of error doesn't just impact the individual. USDA's own research finds that $1 of SNAP benefits generates roughly $2.50 in local economic activity. Patrick Canning and Brian Stacy, *The Supplemental Nutrition Assistance Program* (SNAP) *and the Economy: New Estimates of the SNAP Multiplier*, ERR-265 (US Department of Agriculture, Economic Research Service, 2019), https://ers.usda.gov/publications/93528.

program's intended outcomes—delivering benefits to as many people as possible who qualify for them—not to paper over ambiguity by pushing the burden of proof onto eligible people through onerous paperwork and complicated applications. Below some threshold, administrative spending on verification provides return on investment in the form of program integrity, but above it, that spending ends up denying eligible people benefits, while increasing delay, paperwork, and time wasted. This works directly against what these programs exist to do: deliver economic relief to the people Congress said should have it. It is also wasteful of tax dollars. No plausible amount of program-integrity value justifies a state spending twice as much to confirm eligibility as it spends on the underlying benefit. Unfortunately, no public scorecard today makes this visible.

Third, none of these systems publish benchmarks. PaymentAccuracy.gov ranks agencies against each other, but "better than Treasury" is not the same as "good." A program can rank high on that dashboard, but still fail most of its eligible population. The CMS Scorecard publishes state-level metrics with no published target attached to them. A dashboard that shows Georgia's 2:1 ratio without saying whether that number is good, bad, or normal gives politicians too much leeway to make the narrative work for their purposes. The scorecard needs targets built in, because the scorecard is designed to set the narrative itself about what good government looks like and what the American people deserve.

Figure 4



Floor and target are set within a cohort of states with similar conditions.
Stretch is set to be above the single best performance achieved across cohorts.

Figure 4 is a mockup of what that public scorecard could look like. A tool like this can incentivize agencies to move the needle on what really matters, and put public pressure on them to do so.

Considerations for Defining Floor/Target/Stretch Numbers

Existing systems that set targets for state or plan performance can provide inspiration to set floor, target, and stretch goals. The National Committee for Quality Assurance's Healthcare Effectiveness Data and Information Set (HEDIS) system defines benchmarks for health-plan quality measures, publishes percentile bands, and breaks those bands out by national, state, and regional geography specifically because plan performance relies so heavily on the population a plan actually serves.[56]

For uptake and administrative spend metrics, the numbers likely vary widely state by state, shaped by things like a state's poverty rate, whether it has already adopted categorical eligibility and other burden-reducing eligibility mechanisms, how modern its IT systems are, how big its program is, and its proportion of rural versus urban areas. Holding every state to the same single bar doesn't set them up for success. Instead, we propose grouping states into cohorts of peers facing similar conditions (the same approach HEDIS uses for health plans) and setting targets within each cohort instead of one target for the whole program, with real accountability for states that don't show improvement over time. Within a cohort, the target should be the top-quartile performance already achieved by that cohort's own states—proof that it is realistic and achievable since a peer facing similar challenges has already hit it. Then, for each program, set a stretch goal above the single best performance achieved across all of that program's cohorts: a bar that no state has hit yet, but is within reach.

Day 1 Actions to Establish the New Public Scorecard

- Publish guidance
    - Under the GPRA Modernization Act of 2010, OMB already has the authority to set and publicly report quantifiable outcome and efficiency measures.[57] That authority is sufficiently open-ended that it can be used to adopt eligible-population uptake and administrative spend metrics as required performance measures, with OMB itself defining the metrics and methodology, rather than leaving each agency to set their own. On Day 1,

[56] Becky Kolinski, "Improving HEDIS Performance through Benchmarking," NCQA, May 6, 2025, https://ncqa.org/blog/improving-hedis-performance-through-benchmarking.
[57] Office of Management and Budget, "Part 6—Executive Summary," in *Circular No. A-11* (2016), https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/a11_current_year/part6_executive_summary.pdf.

OMB should issue an A-11 Part 6 memo, under this authority, to direct all agencies that oversee economic relief programs to collect and report their data against that shared standard. USDA's Food and Nutrition Administration (FNA) already measures uptake state-by-state in an annual report series called Reaching Those in Need going back to 2007, using its own existing program administration authority. The goal is to make that the government-wide norm.[58]

    - OMB and other relevant agencies should issue guidance making uptake and overhead reporting infrastructure an explicitly eligible use of existing funding streams—thus redirecting funds that have already been appropriated.
- Open the data
    - Publish the data and scorecard on PaymentAccuracy.gov, which, because it is statutorily authorized by the Payment Integrity Information Act, is more institutionally durable than Performance.gov.
- Carrots and sticks
    - Make the scorecard a source of public credit. The president and White House should personally and publicly spotlight top-performing and early-adopter states, through a White House ceremony, a presidential mention, or an official visit. This turns strong scorecard performance into a source of national recognition.[59]
    - Make the public scorecard part of the President's Management Agenda and designate uptake and administrative-overhead reduction as a Cross-Agency Priority (CAP) Goal.
    - Make compliance easier for agencies. The Office of Information and Regulatory Affairs (OIRA), a statutory office within OMB, should establish a single shared data schema and reporting platform for agencies to submit their data, and develop streamlined pathways for agencies to access the wage, tax, and census data they need to model their eligible population.
    - Attach real consequences to failing to report, reporting inaccurately, or performing poorly on uptake and administrative overhead. A state in the bottom performance cohort for multiple consecutive years should be required to report to the relevant federal agency's Inspector General (IG) and appear before the relevant congressional oversight committee to explain its performance. It is already common practice for federal agency IGs to testify before Congress. Agency IGs and Congress should extend

[58] US Department of Agriculture, Food and Nutrition Administration, "Report Series—Estimates of State SNAP Participation Rates (Reaching Those in Need)," last modified April 21, 2025, https://fna.usda.gov/research/snap/state-participation-rates.

[59] There is precedent for this. During the Clinton administration's "Reinventing Government" initiative, Vice President Al Gore personally awarded the "Hammer Award" to federal teams that cut red tape and improved how government worked. See, for example, US Department of the Treasury, "Treasury Department Receives 26 Hammer Awards from NPR," press release RR-1463, January 24, 1997, https://home.treasury.gov/news/press-releases/rr1463.

that practice so that a poor-performing state's own leadership, not just federal officials, is the one in the hot chair.

- Set a system for accountability
    - Set the actual floor, target, and stretch numbers with independent outside researchers, not the agencies being measured. Resources to consider:
        - The Urban Institute used the Analysis of Transfers, Taxes, and Income Security (ATTIS) microsimulation model to estimate what full participation would look like across seven safety-net programs: SSI, SNAP, WIC, TANF, childcare subsidies, LIHEAP, and housing assistance.[60] This is a serious, independently modeled ceiling to calibrate a stretch goal against.
        - Independent researchers like the Urban Institute, MACPAC, KFF, Center on Budget and Policy Priorities, and others who are well-positioned to inform this work should translate that modeling into actual floor/target/stretch numbers. This prevents agencies from grading themselves.
        - In the philanthropy space, a new methodology called "Dollars in Pockets" might be worth considering as well.[61] It is meant to be a comprehensive metric that considers every dollar that an intervention saves or brings into someone's life.

First 100 Days

- The public scorecard, with floor/target/stretch benchmarks, is live for 100 percent of the programs named in the Day 1 OMB memo.
- Fund the capacity to actually do the reporting through grant programs and discretionary funding streams that states already have access to. Concretely, states need to clean up and standardize the enrollment data their eligibility systems produce and build data-matching infrastructure to compare their enrollment records against wage and tax data, so that they can identify likely eligible, unenrolled households. USDA's SNAP Process and Technology Improvement Grants (PTIG) fund up to $5 million a year, to 6–12 grantees, for exactly this type of state-level system and process work.
- States committed to building this reporting capacity and/or demonstrating progress on uptake should get priority in the competitive scoring for these types of grants. States that report inaccurate data or don't report at all should lose access to these funding sources until they're back in compliance. This will reward transparency instead of punishing states for telling the truth even if their numbers are bad.

[60] Giannarelli et al., *Safety Net with 100 Percent Participation.*
[61] Elisabeth Wright, "Dollars in Pockets: A New Way to Measure What Matters," GitLab Foundation, July 27, 2024, https://gitlabfoundation.org/our-journey/dollars-in-pockets.



By End of Term

- For every program on the scorecard, 100 percent of states that started below floor have climbed to at least target for uptake and administrative spend.
- Target and stretch benchmarks have been reset higher as more states cross the old bar.

An annual public scorecard ranking states and programs on uptake and their effectiveness at delivering direct relief to their constituents helps shift the political narrative to what really matters. It gives high-performing states a reason to publicize what they did right, and gives advocates and legislators in low-performing states ammo to push agencies to give benefits delivery the proper attention and investment it needs. This can also be a mechanism for spreading the practices that already work—spotlighting states and programs that are automating categorical eligibility as an exemplar and putting pressure on other states and programs to jump on the bandwagon.

Build the Public-Option Digital Infrastructure Platform

If you strip any government benefits program down to its parts, you'll find a few common functions across programs: Something that confirms who you are. Something to confirm your financial situation. Something to apply a program's eligibility rules to those facts. Something to get the money or the benefit to you. Identity verification, income verification, eligibility determination, notification, disbursement—these are the building blocks of almost every benefits administration system.

Today, state and federal agencies spend hundreds of millions of dollars building and rebuilding these blocks to deliver the programs, even though these blocks are arguably commodity products. At least 25 states have hired Deloitte to build their Medicaid eligibility systems, in contracts worth at least $5 billion combined.[62] Each of these states is paying hundreds of millions of dollars at a time to essentially "build" the same commodity 25 times over.

This pattern is not unique to eligibility systems, or to Deloitte. Income verification is effectively a monopoly controlled by Equifax. The company holds payroll data on roughly 99 million American workers, well over half of all workers, through exclusive agreements with payroll processors and employers. Equifax pulls in more than $800 million a year in combined federal and state contracts for this data.[63] Multiple federal agencies hold their own separate contracts with Equifax, and within a single state, the

[62] Rachana Pradhan and Samantha Liss, "Medicaid for Millions in America Hinges on Deloitte-Run Systems Plagued by Errors," *KFF Health News*, June 24, 2024, https://kffhealthnews.org/health-industry/medicaid-deloitte-run-eligibility-systems-plagued-by-errors.
[63] Ferrell, "Means-Testing Industrial Complex."

Medicaid agency, human services agency, and the workforce agency are often all paying Equifax separately to pull the same income data, when a person applies for Medicaid, SNAP, and other programs run by distinct agencies. Equifax sells verification checks to state benefits agencies at prices that have skyrocketed over the last 10 years, at wildly different amounts across the country. For example, Kansas's Department of Children and Families pays $19.39 per check, while the Center for Medicare and Medicaid Services pays just $5. A small number of commercial vendors holding the only viable version of a function that every government benefits program needs, selling it back to dozens of separately negotiating federal agencies and hundreds of state and local ones, none of them coordinating together on terms or price, is not a competitive market. It is a monopoly over what should really be a public utility.

The Proposal

Digital infrastructure, like water, power, and telecommunications infrastructure, is a foundational layer that every government program and service depends on and is prone to monopoly pricing when it is left entirely to private providers with no public alternative to compete against. It is a public good that deserves public infrastructure. A new administration should build a publicly owned, open-source platform of shared digital components, available to any government agency (federal, state, or local). This platform would be a catalog of interoperable building blocks that agencies can buy and use in the systems they are already running or must develop to administer their programs.

Today, states default to Deloitte, IBM, Salesforce, Optum, and other large contractors because they don't know other options exist, lack the capacity to evaluate them, or can't tell how much money switching would actually save. A public option, open-source platform—paired with transparent pricing showing what it actually costs to build and run each component—establishes a transparent baseline that agencies can use to evaluate vendors' price and quality.

The Precedents

This concept of "digital public infrastructure" (DPI) is not new, and has gained traction internationally over the last decade.[64] India's Aadhaar identity system and Estonia's X-Road data-exchange layer are both examples of DPI components that are built and owned as government infrastructure specifically so that no single vendor can have a monopoly on a function that every public service depends on. Aadhaar gives each India resident a single 12-digit ID number tied to their biometrics, and more than 99 percent of India's adults use it to prove who they are when accessing government benefits,

[64] Jan Krewer, "Signs of Progress: Digital Public Infrastructure Is Gaining Traction," Open Future, March 13, 2024, https://openfuture.eu/blog/signs-of-progress-digital-public-infrastructure-is-gaining-traction.

opening a bank account, or signing up for a phone plan, instead of proving their identity separately to every agency or company they interact with. X-Road is a secure pipeline that lets Estonia's separate government systems (e.g., tax records, health records, benefit systems) check each other's data directly, on demand, without centralizing it all in one place where a bad actor could misuse it. The UK has its own DPI platform, GOV.UK, which includes digital building blocks like notifications and identity verification, available for government agencies to buy and use as part of their own services. A public digital infrastructure platform reinforces the other elements in this road map, facilitating the reporting of uptake and admin-overhead numbers and the adoption of burden-reducing eligibility rules.

Design Principles for the Digital Public Infrastructure Platform

In order to deliver economic relief faster and more automatically, digital infrastructure must be shared, open, and reusable. But the infrastructure that lets a government agency determine someone's eligibility or matches a person's identity across agencies and records is the same infrastructure that an authoritarian government could use for surveillance, disenfranchisement and exclusion. The design principles below would guard against that, built directly into the platform's technical architecture. This won't fully stop an administration determined to break the law and misuse data, but it puts friction into that process and forces misuse to happen out in the open, through actions that can be legally challenged. No single system, agency, or database should be able to unilaterally see, combine, or act on more than its own narrow function requires.

- *Privacy-enhancing technologies* (PET). The platform should provide tools that make privacy-preserving computation the norm. Rather than transferring or exposing the raw data that was used to answer a query, any system using the digital public infrastructure platform would return yes or no without exposing the underlying data. For example, a state Medicaid agency might query the system, "Is this applicant's income, based on the state Unemployment Insurance (UI) agency's wage data, below the eligibility threshold?" The system should return a yes or no answer without exposing the data it used to generate that answer. This section goes into more detail on what these privacy-enhancing technologies look like below.

- *Decentralization.* The platform should be architected so that there is no single point of failure and no single point of abuse. Each agency should be able to deploy its own copy of a shared component—a reusable piece of software, like an app every agency installs and runs separately—over the data that agency holds. An agency's copy connects to other agencies' copies through privacy-enhancing technologies. For example, a state UI agency might run its own copy of the income-verification shared component, on its own servers, over its own wage records. When a different agency has a query based on the state UI agency's



wage data—for example, a state Medicaid agency checking whether an applicant's income falls below the program's threshold—the two agencies' systems talk to each other directly, using the privacy-enhancing protocols (described in more detail later in this section). That exchange computes and returns only the yes or no answer that the Medicaid agency needs, and the underlying wage records used to compute the answer never leave the UI agency's system. At no point does the Medicaid agency, or any other agency for that matter, hold, see, or store the UI agency's raw wage data. This security makes it harder for a hostile administration or bad actor to take advantage of the data, since there is no single, central database of wage data.

- *Zero-trust by default.* The platform should provide tools that make zero-trust services the standard. No system should trust another by default. Every request between agencies should be authenticated and verified at the moment, and every actor's access should be scoped to exactly the subset of data or function needed for the action at hand. This addresses a real root cause of fraud in government programs. GAO estimates fraud accounted for 11–15 percent of all pandemic unemployment benefits paid between April 2020 and May 2023, and federal investigators have traced large portions of that fraud to organized crime rings, including international criminal networks.[65] In many states, all it took to get a claim approved was a stolen name and Social Security Number. Once that one check passed, the state would continue to send benefits every week without applying anti-fraud measures such as checking state new-hire records to see if the person started a new job or checking for duplicate banking or address information across claims.[66] Zero-trust by default would mean applying those same anti-fraud measures to continuing claims, not just new ones.

- *Purpose limitation.* The platform should provide tools that make purpose limitation the standard. Data collected or accessed to help someone access a benefit should stay limited to that use. A wage record pulled to verify SNAP eligibility can be used to determine eligibility for other benefit programs, but it should not become available, by default or by inference, to immigration enforcement or any other agency for a purpose not related to administering benefits.

[65] US GAO, *Unemployment Insurance: Estimated Amount of Fraud during Pandemic Likely Between $100 Billion and $135 Billion*, GAO-23-106696, September 12, 2023, https://gao.gov/products/gao-23-106696; Benjamin Freed, "Criminal Underground Thrived on States' Pandemic Unemployment Programs," *StateScoop*, January 14, 2021, https://statescoop.com/criminal-underground-state-unemployment.
[66] US GAO, *Pandemic Unemployment Assistance: States' Controls to Address Fraud* (GAO, July 23, 2024), GAO-24-107471, https://gao.gov/products/gao-24-107471.



- *Data minimization*. The platform should provide tools that apply data minimization as a discipline. Systems should request, transmit, and retain the least amount of information that answers the question in front of them.

- *Data retention limits*. The platform should provide tools that enforce data retention limits such that requesting agencies hold onto as little as possible for as short a time as possible. The safest record, from an abuse-resistance standpoint, is one that no longer exists. Current law supports this, but a rule on paper is only as strong as an administration's willingness to enforce it. Encoding retention limits directly into the platform's architecture means it does not rely on future administrations following the law. It also has the added benefit of reducing long-term administrative burden on agency IT departments.

- *Full visibility and control over one's own data*. The platform should give people the same access to and control over their own data that the agencies holding it have. To the extent practicable under privacy, security, and program-integrity requirements, a person should be able to see, in one place, every piece of information the platform or an agency system using a platform component holds about them and which agencies have accessed it, correct what's wrong, and delete what they no longer want retained. Similar to data retention limits, encoding this directly into the platform's architecture protects individuals against government misuse. Estonia already has a working model of this—on top of its X-Road infrastructure, it has built the Data Tracker, a transparency tool that lets citizens see who accesses their personal information in state databases and why.[67]

- *Auditable and enforced*. The platform should provide tools that verify and log, on an ongoing basis, that every use of the platform and its components is adhering to the principles outlined above. Agencies that fail to maintain these design principles lose access to federal discretionary funding tied to the platform's use, and serious or repeat violations require that agency's leadership to testify before the Inspector General of the federal agency overseeing that funding and the Inspectors General of the federal agencies that oversee the benefits programs that the agency's platform use is supporting.

- *Tested for bias and accessible by design*. The platform should be designed to hold itself, and every agency using it, to high standards of accuracy, equity, and accountability. Every component of the platform should undergo regular, independent accuracy and bias testing across race, skin tone, age, disability status, and other factors. And every agency that uses the platform must provide a non-algorithmic path for users that their automated system cannot verify or who

[67] Information System Authority (RIA), "Data Tracker," Republic of Estonia, last modified April 30, 2026, https://ria.ee/en/state-information-system/people-centred-data-exchange/data-tracker.



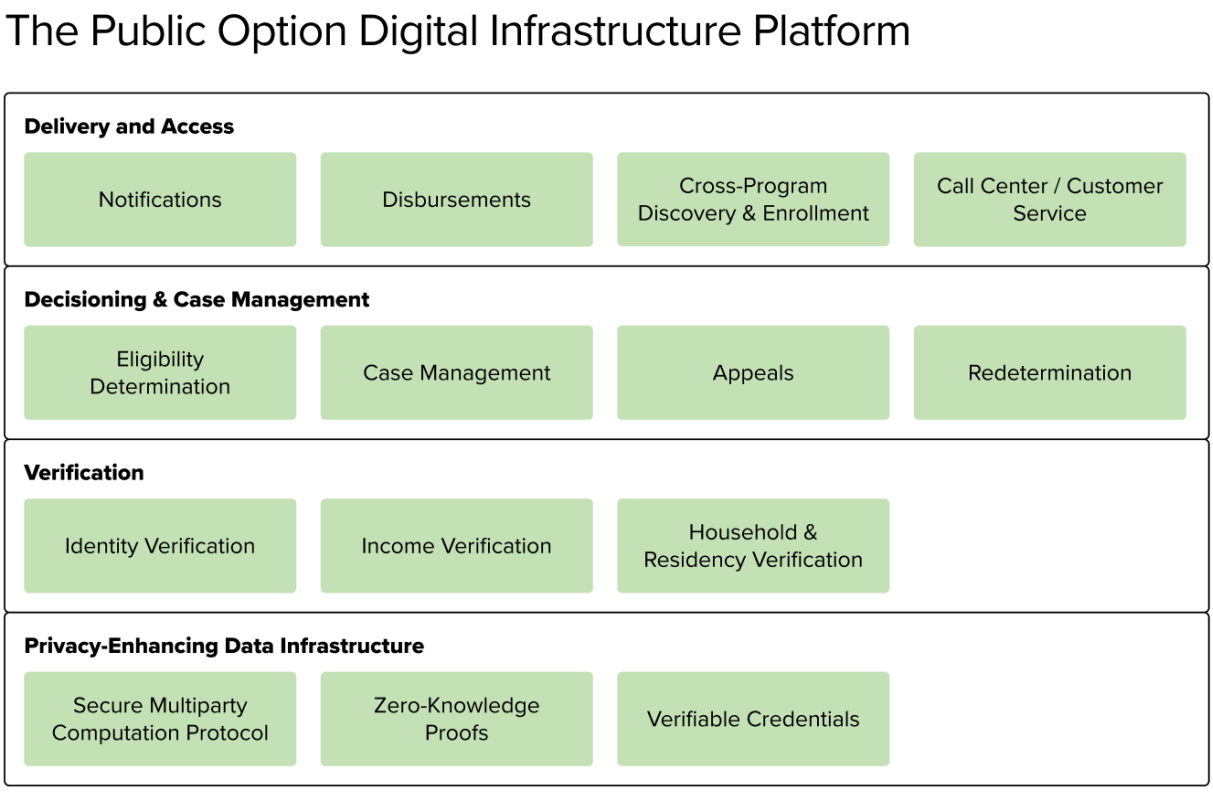
choose to opt out. Agencies that fail to maintain these standards lose access to federal discretionary funding tied to the platform's use, and serious or repeat violations require that agency's leadership to testify before their federal oversight body's Inspector General.

These principles apply to every component described below, built into the technical architecture, policy, and operations of the platform as a whole.

What the Full Platform Looks Like

Think of this platform as a stack of layers, each built on top of the next, offered as a catalog of products and services that the federal government provides to any federal or state government agency. Use only what you need, instead of building your own version from scratch (and paying exorbitant prices set by for-profit vendors and consulting firms). Ideally, dedicated congressional appropriations fund these components so that agencies can use them for free. Absent that funding, agencies should pay for what they use, at cost, with no markup.

Figure 5



Login.gov already shows what a federally hosted product looks like in this platform. The General Services Administration (GSA) operates it as a centralized, shared service, and agencies use it directly rather than deploying and running their own copies. Income verification, eligibility determination, and the privacy-enhancing data infrastructure should be treated differently. These are components that actually touch a person's income, household composition, and eligibility facts, and because keeping those facts decentralized is a core design principle of the platform, we propose them as components that each agency deploys and runs itself, over its own data, the way Estonia's X-Road model works. To support agencies that lack the technical staff and capacity to stand up and maintain a well-documented open-source component, the federal government should also operate a hosted, software-as-a-service version of the Eligibility Rules Engine and Income Verification Service that an agency can subscribe to directly, similar in spirit to how IRS ran Direct File as an actual product rather than only published its code for others to deploy. These federally hosted systems should use the same privacy-enhancing protocols that the self-hosted version uses, so that a subscribing agency is still only exchanging verified facts and proofs, never handing the federal government its underlying records. Any agency that can and wants to run its own instance still can. The hosted product is an additional on-ramp for the agencies that can't or don't want to self-host.

At the foundation of the platform is the **Privacy-Enhancing Data Infrastructure**, the piece that makes every other layer possible without agencies handing each other raw, sensitive data. Instead, each agency keeps its own records—e.g., the state UI agency keeps its own wage data, the Medicaid agency keeps its own enrollment data—and exchanges narrow, verified answers instead of discrete data. For example, when a state Medicaid agency needs to confirm an applicant's income is below its program's threshold, it gets a yes or no answer computed based on the state UI agency's wage data, but does not get access to the UI agency's wage records themselves. This pattern is sometimes called *federation*, and there is precedent for this in the public sector. Estonia's X-Road has operated this way since 2001, and more than 20 countries have since adopted similar models. Three specific privacy-enhancing technologies (PETs) make federated, privacy-preserving answers possible:

- *Secure multiparty computation* lets two or more agencies jointly compute an answer to questions like "is this household income-eligible?" using data split across them without either one seeing the other's underlying data.
- *Zero-knowledge proofs* let a system prove a fact is true, like "this applicant's income is below the program's threshold," without revealing the actual numbers behind it.
- *Verifiable credentials* let a person (or an agency on their behalf) share a single verified fact from a document or system, like "this person is a state resident," pulled from a utility bill or lease, without handing over the entire document and everything else in it.

These technologies are not a recent invention. In fact, the cryptographic groundwork behind PETs traces back to the 1970s, and the term itself was coined in 1995.[68] Building these protections into the platform is more than just good privacy hygiene; it is what makes the rest of the platform politically viable to build in an age where public trust in how the government handles personal data is at an all-time low (and rightfully so).

Built on top of the privacy-enhancing foundation are the components that confirm the facts that an eligibility decision depends on: **identity verification** (proving you are who you say you are), **income verification** (proving how much you make), and **household and residency verification** (proving who lives with you and where). The public option identity verification service already exists—Login.gov is the federal government's public option alternative to commercial products like ID.me and CLEAR. For income verification, CMS developed Emmy, an open source, consent-based income-verification tool, but its functionality is much more limited than what we envision the platform to provide, which we describe in more detail later in this section. Household/residency verification does not have an existing public-option equivalent.

On top of verification sits the layer that makes and manages decisions: **eligibility determination** (software that checks a person's verified facts against a specific program's rules and determines whether they qualify), **case management** (the system a caseworker uses to track and process an application), **appeals** (the system for someone to challenge a decision they think is wrong) and **redetermination** (the system that periodically rechecks that someone still qualifies as their circumstances change).

The top layer is where the platform actually reaches public constituents: **notifications** (the text or letter telling them the status of their application or benefits), **disbursements** (the payment or benefit itself), **cross-program discovery and enrollment** (automatically flagging other programs a person is eligible for and helping them enroll), and **call center/customer service** (the system that allows a person to talk to someone when they need help accessing a program).

Cross-program discovery and enrollment accelerates us toward a more automated safety net. Concretely, it's a component that an agency can adopt to augment its own eligibility rules engine, so that, instead of only checking someone against the one program they applied for, the engine also checks their already-verified facts against other programs' rules-as-code package. If the program is run by a different agency, this check happens through the privacy-enhancing data infrastructure layer, so that the two agencies' systems can compute an eligibility answer without either party ever having to request, receive, or hold the other's underlying data. If a household or person is fully eligible for that other program, the agency's system can enroll them directly. If

[68] Linda Miller, "The Data Minimalists Were Right All Along," *GovIntegrity*, September 10, 2026, https://govintegrity.substack.com/p/the-data-minimalists-were-right-all.

the system is missing a fact that couldn't be resolved through the privacy-enhancing data sharing layer, the system can use the notifications component to send a proactive message to the household and let them know what they are likely eligible for and what to do to complete their application. This layer turns the platform's verification and eligibility determination components from something that speeds up a single application into an engine for proactive, automatic service delivery.

The federal government should build this platform the way any digital product gets built these days: iteratively, applying Agile development principles, defining a Minimum Viable Product (MVP), shipping a thin, working slice first, and scaling out from it once that slice is proven and stable.

The MVP should start with the pieces already closest to existing in some form inside the federal government today (already in development) and the pieces most directly held hostage by commercial vendor monopolies (require new development).

- **Already in development:** identity verification (Login.gov); notifications (Notify.gov)[69]; a narrower, consent-based version of income verification (CMS's Emmy[70]).
- **Requires new development:** income verification (continuous, employer-fed pipeline), privacy-enhancing data infrastructure, eligibility rules engine.

MVP Components Already in Development

Identity verification. The public option for identity verification already exists and doesn't need to be built from scratch: Login.gov. As of August 2026, OMB requires most federal public-facing websites that require sign-in to offer Login.gov, with full adoption due within two years.[71] That is real progress, but it shouldn't turn into a rule that makes Login.gov the only choice. Having several vendors to choose from, with a public option as one of them, makes for a truly competitive market, and prevents the government-run option from becoming a single point of political control.

The mandate has two gaps that a future administration should address. First, it comes with no dedicated funding, and therefore allows agencies with tight budgets to use that as an excuse to stick with commercial vendors. Second, it only applies to federal agencies. The state-run websites that people actually use to access benefits like Medicaid, SNAP, unemployment insurance, and childcare assistance aren't covered. A

[69] Notify.gov was decommissioned in early 2025, following the second Trump administration's federal staff layoffs. However, its codebase is still available on Github.
[70] As of July 2026, CMS plans to fold Emmy into its existing Federal Data Services Hub, a central federal system used to determine eligibility for Medicaid and health insurance marketplace coverage.
[71] Vought, Memorandum M-26-18.



future administration should fund M-26-18's implementation and extend an equivalent requirement to state-administered benefits programs.

Notifications. Revive Notify.gov, which was shut down in June 2025 due to the Trump administration's early efforts to downsize the federal government. This was a text messaging service offered by GSA's Technology Transformation Services (TTS) to help federal, state, local, tribal, and territorial governments more effectively communicate with the people they serve. Before it was shuttered, 13 federal and federally funded agencies sent over 400,000 messages in more than 20 languages. This kind of proactive outreach works. A 2026 study by the National Bureau of Economic Research found that supplementing standard Medicaid renewal notices with reminder phone calls increased renewal rates by 1 percentage point and cut procedural denials—people losing coverage over paperwork, not because they're no longer eligible—by 1.1 percent.[72] Notify.gov applies the same logic through text messaging, and could be further developed to enable automated phone calls. It can be used not only for status updates and renewal reminders, but also eventually for the eligibility notifications and enrollment prompts that a more automated safety net requires.

GSA built Notify.gov as an open-source project, and its core repositories are still publicly available on Github. A new administration should resume the largely intact open-source project, making updates to dependencies and infrastructure as needed before relaunching.[73]

Based on rough estimates of the cost of setting up and managing UK Notify, the UK version of this digital public infrastructure, TTS estimated that operating Notify.gov as a single, government-wide shared service could save more than $350 million per year across government of what would otherwise be duplicative program spending if each agency were to create their own version of this functionality.[74]

MVP Components That Require New Development

Income verification. Right now, most wage verification for benefits programs relies on one of two things: quarterly wage reports pulled from state databases, or the applicant manually submitting recent pay stubs. Neither gets benefits into someone's hands faster, and neither is paperwork-free. Quarterly data means an agency is working off

[72] Rebecca Mary Myerson, Allison Espeseth, and Laura Dague, "Navigating Medicaid: Experimental Evidence on Administrative Burden and Coverage Loss," NBER Working Paper 34191 (National Bureau of Economic Research, August 2025, revised July 2026), https://nber.org/papers/w34191.
[73] General Services Administration, "notifications-api," GitHub repository, https://github.com/GSA/notifications-api; "notifications-admin," GitHub repository, https://github.com/GSA/notifications-admin; "notifications-utils," GitHub repository, https://github.com/GSA/notifications-utils.
[74] GSA Technology Transformation Services Public Benefits Studio, *The Story of Notify.gov* (US General Services Administration, May 2025), https://digitalgovernmenthub.org/wp-content/uploads/2026/02/The-Notify-Story.pdf.



stale information that can be three to six months old, adding delay before an eligibility decision can be made. Manual pay-stub submission puts the burden of proof on the applicant, which is exactly what we are trying to eliminate. On top of slowing things down and piling on paperwork, the status quo causes earnings-related errors. In unemployment insurance specifically, failing to accurately report earnings while collecting benefits accounted for 39 percent of overpayments in 2024.[75] More frequent, automated wage reporting solves all three problems at once—enabling faster eligibility determinations, reducing paperwork burden on applicants, and catching income changes close to when it happens rather than a quarter later.

As of July 2026, the Trump administration's Department of Labor (DOL) has already directed state unemployment insurance agencies to seriously consider collecting wage data on a more frequent basis.[76] States are independently considering legislation that would require pay-period wage reporting for unemployment insurance, and some have the authority to make this change via executive action. There is both federal and state-level appetite for this, and the federal government has an opportunity to facilitate and fund a more streamlined, governed implementation.

There are two federal precedents for doing this voluntarily rather than through a new mandate. Last year, SSA rolled out a system called Payroll Information Exchange (PIE), which lets SSDI and SSI recipients opt in to having their payroll processor report wage changes to SSA automatically and monthly, instead of self-reporting.[77] Of note, PIE is powered by Equifax's The Work Number, the same vendor whose monopoly pricing that we are trying to get agencies out from under. CMS's Emmy (Eligibility Made Easy) is a consent-based verification tool that lets Medicaid applicants connect their own payroll accounts to verify their income. CMS built it in-house and made the code open source, so it doesn't run through Equifax. But Emmy only works when an applicant logs in and makes the connection themself.

What we are proposing goes further. The federal government should build its own wage-reporting system that payroll processors, employers, and state workforce agencies can automatically feed directly into, so that individuals don't have to do anything. At the core of that system is a reusable ingestion and validation service: a shared piece of infrastructure that actually receives incoming wage data from employers and payroll processors, checks it for completeness and basic errors, puts it

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[75] Jack Malde and Aaron Till, *Unemployment Insurance Improper Payments: The Federal Role* (Bipartisan Policy Center, 2026), https://bipartisanpolicy.org/report/unemployment-insurance-improper-payments-the-federal-role.
[76] Luke Timmons, Deputy Assistant Secretary for Unemployment Insurance, US Department of Labor, Employment and Training Administration, to State UI Directors, letter, "Model National Unemployment Insurance Standards," July 6, 2026, https://content.govdelivery.com/attachments/WIGOV/2026/07/09/file_attachments/3709611/ETA%20Letter%20070626.pdf.
[77] Social Security Administration, "SSI Spotlight on the Payroll Information Exchange (PIE)—2026 Edition," accessed August 30, 2026, https://ssa.gov/ssi/spotlights/spot-pie.htm.

into a standard format, and routes it directly into the custody of the state UI agency it belongs to. The service processes and forwards the data, but does not retain a permanent, centrally queryable copy of its own. This is important, because moving from quarterly to pay period reporting isn't just a policy change. It requires state UI agencies to modify their IT systems to receive, process, and validate wage submissions at very different volume and frequency than they are currently set up for. Building that intake infrastructure from scratch is exactly the type of duplicative technical work that the public option digital infrastructure platform aims to eliminate. Instead of every state building its own version, any state can use this one shared service to implement pay period reporting, while the resulting wage data stays in that state's custody rather than pooled centrally. The income verification component would be built on top of this pipeline, using the same privacy-enhancing techniques described earlier. Together, the wage-reporting intake, powered by the ingestion and validation service, and the income verification layer built on top of it are the public option—a government-run alternative to Equifax's The Work Number.

Privacy-Enhancing Data Infrastructure. This core piece makes every component in the platform possible without agencies handing each other raw records. In an era where trust in government is low and surveillance technology is ubiquitous, it is absolutely critical that the public option digital infrastructure platform is built with privacy preservation in mind.

Earlier, we described the techniques that make this privacy preservation possible. Secure multiparty computation (MPC), zero-knowledge proofs, and verifiable credentials are all established fields of cryptography research backed by both rigorous academic studies and real-world implementations. For example, the Boston Women's Workforce Council already uses MPC to enable roughly 90 employers to jointly produce an aggregate wage-gap report while each of the employers keep its own payroll data private from the others and from the council itself, and has released the underlying software as open packages.[78] In 2022, researchers Anunay Kulshrestha and Jonathan Mayer (also former chief science and technology advisor and chief AI officer at the US Department of Justice) published a peer-reviewed protocol, built on MPC, that lets US intelligence agencies and communications providers jointly estimate how much of the government's warrantless surveillance sweeps up Americans' communications—without either side disclosing classified intelligence sources and methods or private user data

[78] Trusted CI: National Science Foundation Cybersecurity Center of Excellence, "Transition to Practice Success Story: Boston University—Secure Multiparty Computation and the Boston Women's Workforce Council," Trusted CI Blog, January 21, 2020, https://blog.trustedci.org/2020/01/transition-to-practice-success-story.html. The Boston Women's Workforce Council has released the underlying software as open packages, and we recommend that the new administration evaluate using those as the basis for its own tool kit build out.

to the other.[79] If this technique is sound enough to be proposed for classified national-security surveillance oversight, it should also be applied to benefits eligibility.

Kulshrestha and Mayer are now turning this same approach toward exactly the problem our digital infrastructure platform must solve: how agencies each holding a piece of someone's eligibility picture—income, household composition—can jointly determine eligibility without pooling their data. Their protocol for this specific application hasn't been published yet, so we're not able to endorse its particular mechanics here—but the direction is a strong signal that this is a live, active area of applied research that can and should be applied to the digital infrastructure platform.

The purpose of this layer in the platform is to make these techniques something agencies don't have to build in-house or understand at the cryptographic level to use. The federal government should develop and maintain open-source, reusable software that implements these techniques as ready-to-use building blocks—the same way Login.gov already lets any agency offer secure sign-in without building its own identity verification system from scratch. An agency wouldn't need to understand how the privacy-preserving math works any more than it needs to understand how Login.gov verifies identity under the hood. It would just plug into a tool the federal government built, maintains, and keeps secure.

Every component and layer of the platform must use these techniques by default. Privacy-enhancing technologies aren't just tools to be applied once, but rather a design principle that is architected into every aspect of the platform.

Eligibility Determination. Instead of every state agency paying to reverse-engineer the same rules from scratch, the federal government should build a public-option rules execution engine, publish each program's federal rules as a "rules-as-code" package, and let any agency plug into both.

Every program's rules currently have to be translated and interpreted from legal language into working software by each agency, one program at a time. "Rules-as-code" is the concept of translating a program's actual legal rules, such as income thresholds and exceptions, into a computer-readable form. The federal agency that owns a program should build and maintain the authoritative rules-as-code package for the program's federal-level rules, setting the baseline that every state starts from. States can then layer their own state-specific rules-as-code packages on top, reflecting whatever additional options or variations their federal rule permits. The federal government shouldn't try to own every state's interpretation, but it also shouldn't leave

[79] Anunay Kulshrestha and Jonathan Mayer, "Estimating Incidental Collection in Foreign Intelligence Surveillance: Large-Scale Multiparty Private Set Intersection with Union and Sum," in *Proceedings of the 31st USENIX Security Symposium* (USENIX Association, 2022), 1705–22, https://usenix.org/system/files/sec22-kulshrestha.pdf.

states to code their own versions independently and inconsistently. Instead, it can play the critical role of actively coordinating the harmonization and codification of state-level rules. In practice, this could look like a federal set of test cases that any state's rules-as-code package has to pass, thus confirming that a state's added rules build on the shared federal package and don't drift out of line with federal requirements. This shouldn't be treated as a one-time retrofit applied to existing rules, either. Every future rule change to a program—e.g., a new regulation, a new statute, a state's new eligibility option—should be written in both plain language and a machine-consumable format from the start, as a standard part of the rulemaking process. This has the potential to shift how the government writes rules and how everyone else, from state agencies to the community organizations helping people apply, can act on them.

The rules execution engine is the piece of software that takes a program's eligibility rules, written in a form that a computer can read (rules-as-code), and automatically checks a specific applicant's information against those rules to determine whether they qualify. Today, caseworkers manually check a rulebook against someone's paperwork by hand, or, more likely, a government agency pays an outside contractor hundreds of millions of dollars to build and maintain custom software to do that.

This concept isn't just theoretical. New York City's ACCESS NYC uses a rules engine to run eligibility screening across more than 40 benefit programs.[80] mRelief, a nonprofit software company, has used the same approach to help more than 2.7 million people access SNAP, unlocking over $1 billion in benefits nationwide. Benefits Data Trust and Alluma, both nonprofit organizations, have used the same model to process tens of millions of applications and screenings across dozens of states and counties. Internationally, France uses its open source rules execution engine to power Mes Aides, a public tool that checks eligibility for more than 30 government benefit programs, and New Zealand uses a similar approach in SmartStart, its tool for new parents.[81]

The federal government has also tried this before, though at a much smaller scale. Between 2017 and 2020, GSA's 18F team built a prototype rules-as-code tool for SNAP, funded through the agency's 10x innovation program. The prototype worked well enough that outside groups built on top of it for years afterward. Unfortunately, it did not materialize into a fully backed, production federal service, and then the office that

[80] NYC Mayor's Office for Economic Opportunity, "NYC Benefits Platform: Dataset and Screening API," accessed August 31, 2026, https://nyc.gov/site/opportunity/portfolio/nyc-screening-api.page.
[81] Ariel Kennan and Sara Soka, *Benefit Eligibility Rules as Code* (Beeck Center for Social Impact + Innovation, Georgetown University, February 2022), https://beeckcenter.georgetown.edu/wp-content/uploads/2022/05/Benefit-Eligibility-Rules.pdf; *Mes Droits Sociaux* (French government website), accessed September 1, 2026, https://mesdroitssociaux.gouv.fr/accueil.

built it was eliminated altogether by the Trump administration last year.[82] The federal government should build, fund, and institutionalize this Eligibility Determination layer at production scale. To start, this layer could run reactively, triggered when someone applies to a specific program. But future iterations of the engine could run proactively, checking a person's already-verified facts against other programs' rules to make cross-program discovery and enrollment possible.

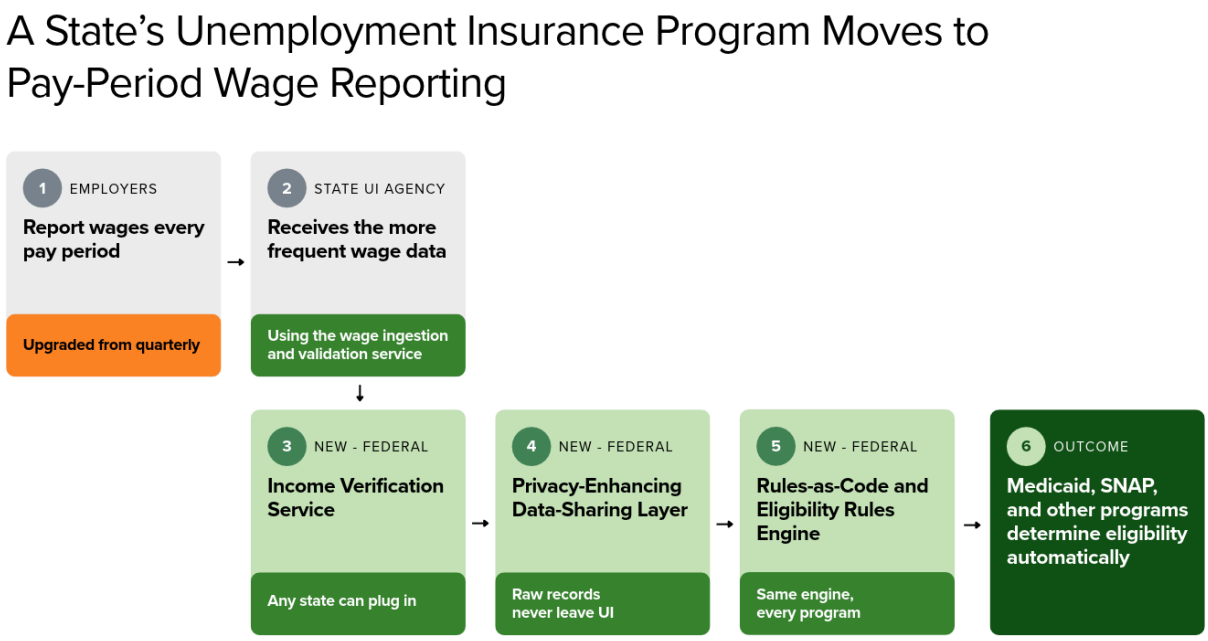
What the Digital Infrastructure Platform Unlocks

Figure 6 walks through an example end-to-end of how government agencies can use the digital infrastructure platform to deliver benefits more cost-efficiently and more effectively. Imagine a state's unemployment insurance program moves from quarterly to pay-period wage reporting. Employers report wages every pay period instead of every quarter, feeding into the wage ingestion and validation service in the platform, which checks that data and puts it into a standard format for the state UI agency to process without the state having to build its own intake pipeline to handle the new volume and frequency of wage data.

From there, three pieces of the federal digital infrastructure platform work together to do something no one agency can do alone: let Medicaid, SNAP, and other benefit programs verify an applicant's income eligibility without ever seeing the UI agency's raw wage data and without that data ever leaving the UI agency's own systems. A Medicaid or SNAP agency plugs into the income verification service to ask: "Is this person income-eligible?" The privacy-preserving data-sharing layer makes it possible to get a verified answer back, without the underlying wage records changing hands. The eligibility rules engine, loaded with each program's own federal rules-as-code package and state-specific packages, applies Medicaid's rules or SNAP's rules to that answer to make an actual determination. The result is a public-option alternative to paying Equifax, Deloitte, and other vendors, program by program, state by state, for versions of the same basic functions.

[82] Virginia Poverty Law Center built a state-specific SNAP calculator on top of it, and SNAPScreener.com adapted it into a tool covering every state and territory. Ariel Kennan and Elizabeth Bynum Sorrell, "Project Snapshot: 18F's Eligibility APIs Initiative," Digital Government Hub, Beeck Center for Social Impact + Innovation, Georgetown University, October 18, 2022 (updated September 26, 2024), https://digitalgovernmenthub.org/publications/18fs-eligibility-apis-initiative; Merici Vinton, Lynn Overmann, and Jeremy Barofsky, "Introducing Digital Service Retros: Back to the (Digital) Future," Federation of American Scientists, January 28, 2026, https://fas.org/publication/digital-service-retros.

Figure 6



Public option alternatives to Equifax, Deloitte, and other for-profit vendors that overcharge the government and waste American taxpayers' time and money

Building the Platform in One Term

By the end of the term, the administration should have the entire platform built and in production, with at least two government agencies actively using every component. The strategy is to build the platform, offer it at cost, invest in adoption and partnerships with agencies, and design incentives and enforcement to get more agencies to adopt this platform.

Day 1

Scale up adoption of Login.gov, the federal public option identity verification solution.

- Identify dedicated funding for agency migration to Login.gov.[83]

[83] Potential funding mechanisms: the Technology Modernization Fund, established by the Modernizing Government Technology Act of 2017; CMS's 90/10 federal match for Medicaid eligibility-and-enrollment system design and development; the Federal Citizen Services Fund, established through the E-Government Act of 2002.

- Direct state-run portals for all economic relief programs (e.g., SNAP, Medicaid, Unemployment Insurance, Child Care Assistance) to offer Login.gov as a sign-in option.

Relaunch Notify.gov, and scale up adoption.

- Reestablish the Notify.gov product development team, staffing with a mix of veterans from the original product development team.
- Direct GSA technical staff to make the minimal set of updates to the codebase to prepare for a production relaunch.
- Clarify the legal pathway for State, Local, Tribal, and Territorial (SLTT) government agencies to use Notify.gov.
- Encourage all public-facing federal and state government agency-run portals to adopt Notify.gov as their method for sending notifications to applicants and beneficiaries.

Develop the income verification MVP.

- Establish standard definitions for what counts as reportable wages, hours, and exemptions, to be used by DOL and all state-level agencies that use this data.
- Direct GSA to develop the wage and ingestion validation service, the shared infrastructure that enables a state agency to implement pay period wage reporting without having to build their own intake pipeline from scratch.
- Convene a working group that brings together GSA, DOL, the state workforce agencies (SWA) already furthest along on more frequent wage reporting, Medicaid and SNAP agencies, and the technical staff that will build the privacy-preserving data-sharing protocol described earlier in this section. On Day 1, this working group should scope and begin work on a pilot applying that protocol to enable the Medicaid and SNAP agencies to verify an applicant's income directly against the SWA's wage data, without the SWA ever handing over the underlying wage records. This will be the first real-world implementation of the income verification and privacy-enhancing data components working together. The states that succeed in this pilot become the premier implementations that later phases of the road map build on.
- Scope the income verification MVP to work two different ways, so that agencies can pick the version that fits their own technical capacity and needs. In the self-hosted version, the federal government builds and publishes the underlying software as open source, meaning the code is publicly available for any agency to download and modify to fit its needs. An agency with its own technical staff and infrastructure installs and runs that software on its own services over its own data and uses the eligibility determination and privacy-enhancing data infrastructure components, described below, to enable other agencies to query off of its data. In the federally hosted version, the federal government runs the

software itself, the same way it runs Login.gov today, and an agency simply subscribes to use it, without installing or maintaining anything on its own end. The self-hosted option serves agencies that would rather keep the software running on infrastructure they control, for their own security, procurement, or reliability reasons.

Develop the eligibility determination and privacy-enhancing data infrastructure MVPs.

- Establish a standard technical schema, or shared format, for how rules-as-code packages are written and structured, so that every program's federal package and every state agency's package layered on top of it are built the same way and can plug into the Eligibility Rules Engine.
- Direct GSA to develop the Eligibility Rules Engine and the privacy-enhancing data infrastructure.
- Publish the federal-level rules-as-code package—the coded version of eligibility rules—for every economic relief program. This is the "baseline" version of each program's rule, owned and maintained by the federal agency that oversees the program. States will build their own variations on top.
- Publish guidance that, moving forward, any change to a benefits program's rules, whether from a new law or new regulation, must be published both in plain language and in the standard rules-as-code format.
- Scope both an open source, self-hostable release and a federally hosted, subscription version of the Eligibility Rules Engine.

First 100 Days

Scale up adoption of Login.gov and Notify.gov. States retain the ability to use additional or alternative tools suited to their populations or use cases that Login.gov and Notify.gov may not serve well, such as noncitizens eligible for state benefits, who may be wary of a federally run identity verification system, and use cases where Notify.gov, still a nascent product, may not meet an agency's needs.

- Actively recruit new agencies during the Notify.gov relaunch, starting with lower-stakes use cases, such as general updates and non-time-sensitive reminders. Once Notify.gov has established a track record of reliability for these use cases, expand to higher-stakes use cases that impact benefits delivery and continuity, such as renewal and recertification reminders.[84]
- Direct CMS to require that state Medicaid eligibility systems offer Login.gov and integrate with Notify.gov for lower-stakes use cases, as a condition of the 90/10 federal match for state Medicaid eligibility systems. Extend the same condition

[84] General Services Administration, Office of Evaluation Sciences, "Increasing Medicaid Renewals with Text Message Reminders," 2025, https://oes.gsa.gov/projects/2406-increasing-medicaid-renewals-with-texts.

to other federal IT-modernization funding streams tied to state benefits systems (e.g., USDA, Housing and Urban Development).
- Direct federal funding agencies to require that any renewed state contract with a commercial identity verification vendor include a defined plan for integrating Login.gov as an additional option.
- Issue federal guidance on acceptable use of identity verification tools across all state benefits systems, specifying where in the application process they can be required. This guidance should prevent states from placing identity verification earlier in the process than necessary, where it risks functioning as an administrative barrier that discourages eligible people from applying. Guidance should apply to any federal funding stream that touches state identity-verification requirements.

Iterate on the eligibility determination and income verification components.

- Encourage, incentivize, and, where possible, direct state agencies to publish their own state-level rules-as-code packages, capturing whatever state-specific options or variations their program allows (such as SNAP's Broad-Based Categorical Eligibility).
- Require, as a condition of any federal funding used to build it, that a state's rules-as-code package is delivered with an open license and full government rights, not owned or controlled by any vendor or contractor involved in writing it. This ensures that states that pay an outside contractor to help build their package still own the product, and can switch vendors later without needing to rebuild it from scratch.
- The privacy-enhancing data infrastructure and protocols are in production use for the income verification and eligibility determination components of the platform.
- Launch a pilot hosted version of the Eligibility Rules Engine and income verification service for a small number of states, drawn from the states already working with GSA and DOL in the Day 1 SWA-Medicaid-SNAP pilot.

Carrots and Sticks for Adoption of the Digital Infrastructure Platform

- Redirect USDA's existing Earnings Verification Support (EVS) grant program, which currently distributes up to $38 million a year to state SNAP agencies to test third-party income verification vendors, into an incentive-payment pool that instead rewards states for adopting pay-period wage reporting.[85] Modeled after the 2009 stimulus package, which made up to $7 billion available to states who adopted specific UI eligibility provisions into their own law, this pool should reward states based on outcome (adoption of pay period reporting) rather than

[85] "FY 2026 SNAP Earnings Verification Support Grant," USDA Food and Nutrition Administration, https://fna.usda.gov/grants/snap/earnings-verification-support-fy26.



dictate how a state gets there, whether it's through new legislation, administrative action, or voluntary adoption among employers.[86]
- Release the wage and ingestion validation service MVP.
- Formally designate the states that come out of the Day 1 SWA-Medicaid pilot working group as premier implementations, and fund them to directly support other states adopting the same pay-period wage reporting process.
- Establish a general safe harbor such that agencies that can demonstrate that they've adopted the digital infrastructure platform (e.g., privacy-enhancing data infrastructure, eligibility rules engines, income verification) receive relief from improper-payment penalties. This rewards agencies that are using the best available tools.
- Begin development of remaining platform components post-MVP, identifying any existing federal systems each could build upon rather than starting from scratch.

By End of Term

- Login.gov is offered as the default, publicly funded identity verification solution at every in-scope federal agency, alongside any other vendor that meets the public option digital infrastructure platform's bias, accessibility, and privacy standards.
- All 50 states plus DC offer Login.gov as an identity verification option for their Medicaid, SNAP, and UI portals.
- Notify.gov is adopted by all federal agencies administering economic relief programs.
- All 50 states plus DC have adopted Notify.gov for their Medicaid, SNAP, and UI portals.
- The wage ingestion and validation service is live and adopted by all 50 state UI agencies plus DC.
- The privacy-enhancing data infrastructure and protocols are used in production in at least 20 agency-to-agency data exchanges.
- The eligibility determination component of the platform has been adopted by at least 40 state agencies across at least 25 states, covering multiple programs each.
- The cross-program discovery and enrollment layer is live for at least five high-overlap program pairs (e.g., SNAP/WIC, SNAP/LIHEAP, Medicaid/SNAP), and adopted by at least 40 state agency-pairs across at least 25 states.

[86] Congressional Research Service, *Unemployment Insurance Provisions in the American Recovery and Reinvestment Act of 2009*, CRS Report R40368, June 17, 2010, https://congress.gov/crs_external_products/R/PDF/R40368/R40368.7.pdf.



Revive and Scale Direct File, Proof That the Public Option Model Works

Direct File is the clearest proof that this lever works. The IRS built and ran its own public option tax filing software, and it garnered industry-leading customer satisfaction ratings.[87] Despite glowing reviews from users, and even the GAO's recommendation to expand it further, the Trump administration shut down Direct File before the 2026 filing season.[88] Direct File was a permitted but not statutorily mandated service, which made it legally easier to eliminate in a changing administration. It was also nascent at the time of a changing administration; it had only been in place for a short time and only available for half of the country. All of this made it less durable. We propose five moves: three specifically aimed at preventing the failure mode that allowed Direct File to be shut down in the first place despite glowing reviews from its users, and two aimed at accelerating adoption and expanding coverage to those eligible for refundable tax credits like the Earned Income Tax Credit (EITC) and the Child Tax Credit (CTC).

1. Expand tax scope. People with gig and self-employment income should be able to use Direct File to submit their personal federal tax return. This way, Direct File's user base includes not just W-2 filers with standard deductions but also the fastest-growing, least-served segment of the workforce.
2. Expand state integrations to all 50 states. Only 25 of 50 states plus DC participated in Direct File's 2025 filing season.
3. Staff an in-house, interdisciplinary product team within the IRS. Crucially, bring back members of the original team who have institutional memory that is vitally important to bringing Direct File back online and implementing points 1 and 2.
4. Restore and expand pre-population. By the 2025 filing season, Direct File was already auto-filling filers' W-2 wage data, 1099-INT interest income, and prior-year return details directly into their returns. Direct File should continue to expand pre-population to include more data sources and data items.[89]
5. Institutionalize a simplified version of Direct File designed specifically for non-filers eligible for EITC, CTC, and other refundable tax credits that often go undelivered. A nonprofit is currently developing and managing this system, but the federal government should offer it directly along with Direct File.[90]

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[87] Jory Heckman, "IRS Direct File Sees Higher Scores Among Users, Despite a Push to Shutter It," Federal News Network, May 30, 2025, https://federalnewsnetwork.com/it-modernization/2025/05/irs-direct-file-sees-higher-scores-among-users-despite-a-push-to-shutter-it.
[88] US GAO, *IRS Successfully Piloted Online Tax Filing but Opportunities Exist to Expand Access*, GAO-25-106933, highlights page, December 2024, https://gao.gov/assets/gao-25-106933-highlights.pdf.
[89] Gabriel Zucker and Chris Given et al., *The Future of Tax Filing* (Economic Security Project, May 2026), https://economicsecurityproject.org/wp-content/uploads/260513-The-Future-of-Tax-Filing.pdf.
[90] Code for America, "GetYourRefund," accessed August 31, 2026, https://getyourrefund.org/en.



On Refundable Tax Credits

Refundable tax credits are one of the primary benefits Congress has authorized that do not reach the people who qualify for them. EITC, for example, is a credit for people who work but earn a low to moderate income. It is refundable, meaning that if the credit is worth more than someone owes in taxes, the IRS sends the difference to them. CTC works similarly for families with children, worth up to $2,200 per child for 2025, of which up to $1,700 per child is refundable the same way. Both exist specifically to put money directly in the pockets of working people and families. But an estimated $7 billion in EITC alone goes undelivered every year to roughly 5 million eligible people, including 3.3 million who don't file a tax return at all. Other refundable credits, like the American Opportunity Tax Credit for education expenses, face the same basic problem on a smaller scale. These credits largely go undelivered because they are triggered by an action (filing taxes) rather than delivered automatically.

Code for America's Get Your Refund, originally developed for the 2021 Advance CTC, already does what we're proposing. It's a free, simplified filing tool built in partnership with IRS VITA sites across the country, designed to reach people who don't typically file on their own. Since it first launched in 2020, it has helped 345,000 people claim over $612 million in refunds and save an estimated $39 million in filing fees, working through more than 100 community organizations in every state and DC.[91] It proves that the model we're proposing already works, at scale. What's missing is institutionalization. Get Your Refund exists because a nonprofit, year after year, secured the funding, maintained the partnership with IRS, and sustained the community relationships that make it work. That is a structural weakness. Non-filers deserve a public option: a permanent, statutorily backed piece of government infrastructure that exists regardless of who's willing to fund and operate it in a given year. A government-run non-filer portal could be built with Code for America, VITA, and other community-based organizations as delivery partners and users of that infrastructure.

Day 1

Capacity

- Restore funding and rebuild the team, ideally including veteran staff from the original team, and get them started on scope-expansion and state-integration work.

[91] Cole Wolf, "Code for America Opens GetYourRefund for 2026 Tax Filing Season," Code for America, January 27, 2026, https://codeforamerica.org/news/code-for-america-opens-getyourrefund-for-2026-tax-filing-season.

Development

- Begin gig/self employment scope-expansion development.
- Begin developing a public option non-filer portal for the EITC, CTC, and other commonly undelivered refundable tax credits.

Adoption

- Launch state integration outreach to the remaining 25 states that were not part of the 2025 filing season.
- Offer a pre-built, reusable state-return connector, modeled after Code for America's FileYourStateTaxes tool) to make it easier and cost-effective for a state revenue department to integrate with Direct File.
- Establish funding to provide technical assistance to states integrating with Direct File.

First 100 Days

- Gig/self employment MVP developed and piloted.
- Use existing W-2 and 1099 data to identify likely eligible non-filers for the EITC, CTC, and other refundable credits, and launch proactive Notify.gov outreach to that population.
- State-return integration live in a first cohort of at least 15 additional states using the reusable state-return connector.
- IRS designates Direct File as the default free-filing option across IRS.gov, taxpayer correspondence, and W-2 and 1099 distribution guidance. It should be structured as a pre-selected default, easy to find on the IRS website, unlike existing IRS Free File partners.[92]
- States that integrate early should be named and celebrated publicly as early adopters.

By 2030 Tax Filing Season

- Public launch of Direct File, available in all 50 states plus DC, for filers with W-2, gig, and/or self-employment income.
- Direct File is used by at least 90 percent of EITC filers.
- At least 25 percent of the estimated 3.3 million annual EITC non-filers are identified and reached through the non-filer portal and proactive Notify.gov outreach.

[92] Justin Elliott and Paul Kiel, "TurboTax and H&R Block Saw Free Tax Filing as a Threat—and Gutted It," *ProPublica*, May 2, 2019, https://propublica.org/article/intuit-turbotax-h-r-block-gutted-free-tax-filing-internal-memo.



Expand Capacity Through Community Delivery

Everything discussed so far is tech or policy: a platform, a rules engine, a statute that the administration could lean on harder. None of it reaches a person who doesn't have reliable internet, doesn't trust a government website, or just needs someone across a table to walk them through a form. This is not a problem distinct from the digital infrastructure platform in the road map. This section answers how that platform reaches everyone who is eligible for these programs, not just the people who are online and know how to navigate a government portal on their own.

The more immediate problem is that administrative capacity itself—the staff who actually process SNAP applications or answer a call on the Social Security Administration's hotline—has been deliberately and systematically gutted. By the end of 2025, the Social Security Administration had lost more than 11 percent of its staff, while HHS and USDA lost 18 percent each.[93] Whoever takes office in January 2029 will need to contend with that. Rebuilding federal and state agency head count could take years even with full use of direct hiring authorities. Community-based organizations that are already funded, staffed, and running today, such as libraries, social services agencies, and food banks, are a capacity lever that is ready to deploy on Day 1.

The opportunity is bigger than substituting missing state capacity though. The Roosevelt Institute's Keene argues that we should consider the people the safety net reaches not merely as recipients to be served but as a constituency to be organized—a power base that has collective bargaining power to design the shape of the safety net and going all the way back to the origins of Community Action Agencies (CAAs) in the War on Poverty's mandate for the "maximum feasible participation" of the people they served.[94] Delivering benefits through institutions a community trusts, rather than only through anonymous digital portals and confusing government bureaucracy, can build that same kind of durable constituency. Alongside codification and widespread adoption of existing burden-reducing policies, building public option digital infrastructure, and the public scorecard, community delivery is one more way this road map is designed to survive a future administration not aligned with this vision.

The organizations best positioned to do this are ones that have already earned a community's trust. The goal of this lever is to formally certify them as benefits navigators—trained, credentialed delivery partners who can not only tell someone what they're likely eligible for but actually get them enrolled. The three specific networks called out below are proven, already funded, and ready to take on this role.

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[93] Molly Weston Williamson, "The Social Security Administration Is Bleeding Staff," Center for American Progress, January 30, 2026, https://americanprogress.org/article/the-social-security-administration-is-bleeding-staff.
[94] Keene, *From Safety Net to Power Base*.

The IRS's Volunteer Income Tax Assistance program (VITA) is the clearest existing model of what a "trusted-agent" network looks like in practice. IRS trains and certifies volunteers at community tax sites to prepare returns for free for low-to-moderate income filers. Today, VITA's mandate stops at tax prep, even though its volunteers are already interfacing with exactly the population most benefits programs are trying to reach, often with that person's full income picture already in front of them. In addition to expanding VITA's tax-preparation capacity, we recommend training and certifying VITA volunteers as benefits navigators, equipping them to help clients enroll in other public benefits programs like SNAP, Medicaid, and WIC alongside their tax filing, using the cross-program discovery and enrollment layer of the digital infrastructure platform. This turns VITA sites into genuine one-stop shops rather than single-purpose tax clinics.

Another existing, already funded national network sized for exactly this capacity expansion is Community Action Agencies. More than 1,000 CAAs operate across the country and Puerto Rico, funded through the Community Services Block Grant (CSBG).[95] Formally deputizing a CAA as a benefits navigator means: proactively identifying households in its service area likely eligible for SNAP, Medicaid, or other programs; screening them using the same Eligibility Rules Engine a state agency's own portal runs on; helping them complete, verify, and submit an application; and following up on renewals, re-verifications, and appeals. While this specific action does not directly reduce paperwork, it speeds up relief and makes it more structurally resistant to data misuse.

Libraries are also a natural fit. Nearly every community in the country has a public library branch that residents visit regularly, which makes it exactly the kind of low-friction, trusted location a benefits-navigator certification could and should extend to. There are multiple city-level examples of this to build upon and take nationwide. San Francisco Public Library has piloted a version of this since 2009, when its Main Library partnered with the city's Department of Public Health to place trained on-site staff who connect patrons to CalFresh, General Assistance, and Social Security benefits.[96] Texas's Health and Human Services Commission (HHSC) shows what this looks like at scale across multiple types of institutions at once. Its Community Partner Program certifies local organizations, including libraries, food banks, health clinics, churches, and schools, to help residents apply for food, financial, and healthcare

[95] US Department of Health and Human Services, Administration for Children and Families, Office of Community Services, "About CSBG," accessed August 30, 2026, https://acf.gov/ocs/programs/csbg.
[96] Leah Esguerra and Jennifer Keys, "San Francisco Public Library Social Service Program," presentation, San Francisco Public Library, accessed September 13, 2026, https://media.api.sf.gov/documents/SFPL_Social_Service_Program_Presentation.pdf.



assistance online.[97] Today, the program covers 252 of Texas's 254 counties through more than 500 community partners.

Rather than having these trusted agents be a workaround that sits outside the government-run portals and the digital infrastructure platform, these community-based organizations can be a second front door to the same backend. A certified CAA caseworker, cross-trained VITA volunteer, or librarian should be able to produce the same real-time eligibility determination a self-service online applicant would get, because the state agency has built its own case management tool on the eligibility determination and verification components of the digital infrastructure platform.

Identity verification is a strong use case to make this even more concrete. Login.gov offers in-person identity proofing at more than 18,000 US Postal Service (USPS) retail locations nationwide, and 99 percent of Americans live within 10 miles of a post office. That same in-person proofing model could extend to certified community partners so that anyone without a smartphone, without a photo ID that scans cleanly, or who simply trusts their local food bank or library more than a federal building or website has another place to turn.

The privacy-enhancing data infrastructure and eligibility determination components of the platform help make community-based organizations more effective as well. A librarian helping someone apply for SNAP, Medicaid, and TANF all at the same time shouldn't have to manually collect and mail the same set of documentation to multiple state agencies. The same cross-agency verification should occur regardless of whether the applicant reaches it through the government web portal themself or through a conversation with their librarian.

This only works if community organizations are treated the same way as any government caseworker when it comes to who can see what and why. Government agencies that build their systems using building blocks from the digital infrastructure platform get the platform's privacy protections built in, such as limits on how much information gets shared, who it gets shared with, and how long it's kept. A benefits-navigator credential should carry those same protections with it as a scoped, logged grant of access that lets someone do a specific job on the certifying agency's system.

Precedence for this type of access-control in government programs exists. Most notably, Affordable Care Act health insurance marketplaces run a version of this, where Navigators and Certified Application Counselors are individually certified and

[97] Texas State Library and Archives Commission, "Libraries Benefit Communities through Partnerships: Texas Health and Human Services Commission's Community Partner Program," January 28, 2025, https://tsl.texas.gov/ld/librarydevelopments/2025/01/28/libraries-community-partner-program.

background-checked before they get their own access to a consumer's account, separate from the consumer's own login. Federal guidance requires a signed consumer authorization first and limits assisters to the minimum data needed for the task at hand.[98] A benefits-navigator credential should meet that same bar, and go further, by maintaining an audit trail of what was accessed and when.

Spreading delivery this way also reinforces the durability this road map requires. A benefits system accessible through thousands of trusted local organizations that depend on it to serve their own communities is a much harder thing for a hostile administration to shut down without a visible, politically costly fight.

Day 1

- Establish a single, cross-agency Benefits Navigator Program. This program should be led by HHS's Administration for Children and Families' Office of Community Services, which administers CSBG and oversees the CAA network. Other agencies that oversee economic relief programs, including other HHS agencies, USDA's Food and Nutrition Administration, SSA, and IRS, should join through an interagency agreement. The program should set one national certification standard, open from day one to CAAs, VITA sites, libraries, food banks, health clinics, schools, churches, and tribal organizations, following the Texas HHSC Community Partner Program model.
- Direct and fund the CAA network to formally take on the benefits-navigator role described above—proactive outreach eligibility screening, application assistance, and follow-up on renewals and appeals.
- Direct IRS to expand VITA grant funding and begin designing a cross-training curriculum so that VITA volunteers can screen for and help enroll filers in SNAP, Medicaid, and other benefits.
- Establish a public "Certified Benefits Navigator" directory. CAAs, VITA sites, libraries, and other organizations that earn the credential get listed publicly, which drives foot traffic, volunteer recruitment, and funder confidence in those organizations.

First 100 Days

- National benefits-navigator certification and training curriculum finalized and open to applications from any qualifying community organization.

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[98] Centers for Medicare & Medicaid Services, *Obtaining Consumer Authorization and Handling Consumers' Personally Identifiable Information (PII) in the Federally-facilitated Marketplace* (FFM), CSG-202509, September 2025, https://cms.gov/marketplace/technical-assistance-resources/consumer-authorization-and-handling-pii.pdf.

- Establish a grant program for capacity-expansion, to support VITA site expansion and capacity expansion for CAAs, libraries, and any other certifying community organization.
- At least 2,000 organizations and their trained personnel are certified as benefits navigators.
- Certified benefits navigators established as an in-person identity verification option for Login.gov, alongside USPS locations.
- Certified benefits navigators are given credentialed, role-scoped access to the Eligibility Rules Engine and verification components wherever a certifying agency has adopted them.

By End of Term

- All ~1,000 CAAs formally certified as benefits navigators and connected to agencies' systems built using the digital infrastructure platform.
- VITA site capacity has at least doubled, with cross-trained benefits navigator services available at every site.
- Benefits-navigator certification adopted by library systems nationwide, reaching at least 5,000 branches.
- Certified benefits navigators, across every eligible organization type, operating in at least 90 percent of US counties, matching the near-universal county coverage that Texas' Community Partner Program has achieved.

Chapter 5: Estimated Impact

As stated at the top of this paper, over $227 billion in benefits Congress has already authorized go undelivered each year. This is not the only problem this road map aims to solve though. Too many people never get real access to the programs meant to serve them, and the government spends billions of dollars a year on contractors and duplicative systems that could otherwise fund benefits directly. Each mechanism in the road map falls into one of three categories addressing these problems:

- **Expanding Enrollment.** An expansion of who is enrolled in or retains the benefits they already qualify for, directly translated into additional benefits dollars that would have otherwise gone undelivered to genuinely eligible people. We estimate that our road map could secure $49 billion a year in benefits for eligible people.
- **Expanding Reach.** Expansion of direct service delivery capacity through free tax filing and in-person benefits navigation—reaching people the existing system overlooks. We estimate that our road map could enable 18 million additional people to get direct help claiming the benefits they're eligible for.
- **Reducing Wasteful Government Spending.** A redirection of government spending away from commercial vendors and toward reusable public infrastructure—resulting in real cost savings that can go toward providing direct



benefits to the people who need them. We estimate that our road map could redirect $6 billion a year from fragmented, duplicative commercial contracts and concentrated markets to government-owned public options.

The estimates in this chapter are rough order of magnitude figures, meant to show whether an opportunity is worth tens of millions, hundreds of millions, or billions of dollars.[99]

Expanding Enrollment: $49 Billion a Year in Benefits Secured for Eligible People

This category most directly addresses that $227 billion in undelivered benefits. Together, the mechanisms below represent as much as $49 billion a year in benefits reaching or staying with people who qualify for them today, whether by newly enrolling them or protecting coverage they'd otherwise lose to red tape.

Broad-Based Categorical Eligibility (BBCE) in SNAP. Seven states—Kansas, Mississippi, Missouri, South Dakota, Tennessee, Utah, and Wyoming—have not yet adopted BBCE, which lets states raise SNAP's income and asset limits and eliminate the asset test altogether. It may sound counterintuitive at first, but BBCE actually reduces costs for the states that adopt it. A 2019 USDA study found that BBCE reduces state administrative expenses per case by about 7 percent, by simplifying eligibility determinations and eliminating redundant asset verification.[100] Under H.R. 1, states face a 25 percent increase in their share of SNAP administrative costs, so adopting BBCE would lessen the burden.

Researchers Xingguo Wang et al. use Callaway and Sant'Anna Difference-in-Differences (CSDD) modeling to show that adopting BBCE would increase SNAP participation by 15.3 percent and at a long-run plateau would reach roughly 25 percent seven years post-implementation.[101] Applying this statistical model to current SNAP participation in the seven non-adopting states—2,187,828 people, the combined FY 2025 average monthly participant count across all seven—we would expect roughly 334,738 new SNAP participants, rising to roughly 546,957 over the course of the seven years that it takes for the policy to be fully implemented and mature. At the federal government's

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[99] Our full calculations, assumptions, and sourcing are available in this supplementary spreadsheet: https://docs.google.com/spreadsheets/d/1ZbCtO1T7iD0jRZBxhDDIyYcXcY5d-LtErQx4Y7V2z9M/edit?usp=sharing.

[100] Daniel Geller et al., *Exploring the Causes of State Variation in SNAP Administrative Costs* (US Department of Agriculture, Food and Nutrition Service, June 2019), https://fns-prod.azureedge.us/sites/default/files/media/file/SNAP-State-Variation-Admin-Costs-FullReport.pdf.

[101] Xingguo Wang et al., "Broad-Based Categorical Eligibility Policy and SNAP Participation," *Journal of Policy Analysis and Management* 45, no. 1 (2026): e70063, https://onlinelibrary.wiley.com/doi/10.1002/pam.70063.

average SNAP benefit of $2,259 per person per year, that represents approximately $756 million a year in SNAP benefits reaching people who qualify for them, rising to roughly $1.2 billion a year in the long-run.[102]

States Not Currently Using BBCE	Base SNAP Population	Number of New Enrollees	Additional Benefit Dollars Delivered Per Year	Number of New Enrollees (7 Years Post-Implementation)	Additional Benefit Dollars Delivered Per Year (At Long-Run Plateau)
Kansas	187,181	28,639	$64,694,807	46,795	$105,710,470
Mississippi	363,309	55,586	$125,569,400	90,827	$205,178,758
Missouri	662,382	101,344	$228,937,104	165,596	$374,080,235
South Dakota	75,176	11,502	$25,982,855	18,794	$42,455,646
Tennessee	696,071	106,499	$240,580,932	174,018	$393,106,097
Utah	176,220	26,962	$60,906,390	44,055	$99,520,245
Wyoming	27,489	4,206	$9,500,941	6,872	$15,524,413
Total	**2,187,828**	**334,738**	**$756,172,428**	**546,957**	**$1,235,575,863**

SSI-to-Medicaid adjunctive eligibility. Sixteen states do not automatically extend Medicaid to Supplemental Security Income recipients, even though the federal legal flexibility exists.[103] Eight of these states require SSI to meet separately defined, sometimes more restrictive criteria, and nine require a separate Medicaid application. Roughly 1.09 million SSI recipients live in those jurisdictions.[104] Closing even a modest share of the resulting take-up gap—for example, 5 to 30 percent—would extend automatic Medicaid access to between roughly 54,000 to 326,000 people who qualify today but do not receive it. Medicaid coverage for this population, which is predominantly aged and disabled, costs an average of roughly $20,572 per enrollee per year.[105] Therefore, this lever represents between roughly $1.1 billion and $6.7 billion a year in coverage reaching people who qualify for it.

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[102] US Department of Agriculture, Food and Nutrition Administration, "National and/or State Level Monthly and/or Annual Data," FY 69 through FY 26 (.zip), https://fna.usda.gov/pd/supplemental-nutrition-assistance-program-snap.
[103] Congressional Research Service, *Medicaid Eligibility: Older Adults and Individuals with Disabilities*, CRS Report R46111, December 9, 2019, https://congress.gov/crs-product/R46111.
[104] Social Security Administration, "SSI Recipients by State and County, 2025," table 1, accessed August 30, 2026, https://ssa.gov/policy/docs/statcomps/ssi_sc/2025/table01.html.
[105] Rhiannon Euhus and Jessica Mathers, "A Look at Variation in Medicaid Spending per Enrollee by Group and across States," KFF, October 6, 2025, https://kff.org/medicaid/a-look-at-variation-in-medicaid-spending-per-enrollee-by-group-and-across-states. Blended average of aged ($20,194) and disabled ($20,950).

States	Number of SSI Recipients	5% Auto-Enrolled in Medicaid	30% Auto-Enrolled in Medicaid
Connecticut	66,312	3,316	19,894
Hawaii	20,858	1,043	6,257
Illinois	244,025	12,201	73,208
Minnesota	90,436	4,522	27,131
Missouri	125,586	6,279	37,676
New Hampshire	15,275	764	4,583
North Dakota	8,094	405	2,428
Virgina	148,709	7,435	44,613
Alaska	10,166	508	3,050
Idaho	27,858	1,393	8,357
Kansas	44,078	2,204	13,223
Nebraska	28,185	1,409	8,456
Nevada	52,948	2,647	15,884
Oklahoma	92,965	4,648	27,890
Oregon	81,950	4,098	24,585
Utah	30,418	1,521	9,125
Total	**1,087,863**	**54,393**	**326,359**
Additional Benefit Dollars Delivered Per Year		**$1,118,975,882**	**$6,713,855,291**

Unlike BBCE, this isn't a cost that states can offset through administrative efficiency. Expanding coverage will meaningfully impact state budgets. Medicaid's regular federal match for the non-adopting 16 states ranges from 50 percent to 67.6 percent for FY 2025, meaning states would bear roughly $485 million to $2.9 billion a year of this cost themselves.[106] This is a real fiscal headwind that the federal incentive and enforcement mechanisms described in the road map can potentially address. For example, HHS

[106] Medicaid and CHIP Payment and Access Commission (MACPAC), "Exhibit 6. Federal Medical Assistance Percentages and Enhanced Federal Medical Assistance Percentages by State, FYs 2022–2025," in *MACStats: Medicaid and CHIP Data Book*, https://macpac.gov/wp-content/uploads/2024/09/EXHIBIT-6-FMAP-and-Enhanced-FMAP-by-State-FYs-2022%E2%80%932025.pdf.

could condition a state's eligibility for existing discretionary funding streams on adoption of mechanisms like this. This gives non-adopting states a financial incentive to act.

Increasing automation of Medicaid administrative renewals. A 2025 Health Affairs study of USDS technical-assistance interventions in South Carolina, New York, California, and Wisconsin found that automating renewals cut procedural denials (meaning people who lost coverage for paperwork reasons even though they were technically eligible) by 8.3 percentage points.[107]

KFF and the Georgetown University Center for Children and Families's 2025 state survey shows 29 states automate more than half of their administrative renewals—but the rest do not.[108] Extending the same intervention to bring those states to median performance, and applying the 8.3 percent effect found in the Health Affairs study, would help an estimated 1.7 million people retain coverage at each annual renewal cycle. If we aim even higher and get all states to automate 75 percent or more of their administrative renewals, an additional 3.4 million people would retain coverage—for a total of ~5 million people. At Medicaid's national average spending of $7,909 per enrollee per year, that represents $13.4 billion to $40.4 billion a year in coverage that would otherwise lapse for administrative churn reasons alone.[109]

Beyond the value of the coverage itself, churn carries a direct administrative cost for states. Disenrolling and then reenrolling one person costs $400–$600.[110] Applying that range to the 1.7 to 5 million people impacted here saves states an estimated $680 million to $3 billion a year in avoided reprocessing costs alone.

This is by far the largest dollar figure impact, but it differs from the dollar estimates for increased usage of Broad-Based Categorical Eligibility for SNAP and the SSI → Medicaid auto-enrollment mechanism because it represents already enrolled people retaining benefits rather than undelivered benefits.

Express Lane Eligibility (Medicaid/CHIP). Currently authority for Express Lane Eligibility (ELE) ends with CHIP funding at the end of FY 2027.[111] This road map assumes

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[107] Herd et al., "Interventions to Automate Medicaid Renewals," https://healthaffairs.org/doi/10.1377/hlthaff.2025.00316.
[108] Brooks et al., "Medicaid and CHIP Eligibility."
[109] KFF, "Medicaid Spending per Full-Benefit Enrollee by Enrollment Group," State Health Facts, accessed August 30, 2026, https://kff.org/medicaid/state-indicator/medicaid-spending-per-full-benefit-enrollee.
[110] Jennifer Wagner and Judith Solomon, "Continuous Eligibility Keeps People Insured and Reduces Costs," Center on Budget and Policy Priorities, May 4, 2021, https://cbpp.org/research/health/continuous-eligibility-keeps-people-insured-and-reduces-costs.
[111] MACPAC, "Federal Legislative Milestones in Medicaid and CHIP," last modified April 2022, https://macpac.gov/reference-materials/federal-legislative-milestones-in-medicaid-and-chip.



CHIP and ELE's statutory authority is reauthorized before the next administration takes office in 2029. While we are not able to find existing prior research about ELE's impact on uptake, we propose measuring the impact of this road map item as an adoption target. Currently, only 7 states are actively using ELE. Our road map aims to triple that number, reaching at least 21 states by the end of the term. This reflects the safe-harbor guidance, technical assistance, and funding conditions proposed in the road map that did not exist in prior efforts to increase adoption of ELE. Our road map directs states to measure what share of renewals and enrollments across Medicaid and CHIP used ELE.

Cross-program discovery and enrollment. As described in the road map, trained and certified community partners such as CAAs, VITA volunteers, and libraries will be some of the primary users ensuring this proactive cross-program enrollment can be delivered at scale. We were not able to find existing prior research to produce a realistic estimate for the impact of this component of the platform, combined with our proposal to integrate community partners as benefits navigators. The best available evidence was too limited in scope and scale: a cross-program data-matching pilot that ran in Colorado, Massachusetts, Montana, and Virginia and only looked at enrolling Medicaid and SNAP enrollees in WIC.[112] Even at that limited scale, however, the results were promising. In Virginia, families already enrolled in Medicaid were 5 percent more likely to enroll in WIC as a result of the pilot, and families enrolled in more than one program were 8.9 percent more likely. This is a real signal that cross-program outreach works.

Refundable tax credit take-up through Direct File and community-partner-driven outreach. An estimated $7 billion goes undelivered to approximately 5 million people eligible for the EITC. Among eligible non-claimants, 1.7 million filed taxes but did not claim the credit, while the other 3.3 million individuals did not file a federal tax return.[113] While we were not able to find a similar breakdown of estimated CTC payments not delivered, the IRS estimated that in 2021, up to 2.3 million children did not receive their advance CTC payments.[114] The public option non-filer portal and proactive Notify.gov outreach in the road map are aimed specifically at reaching the 3.3 million non-filers eligible for EITC and the 2.3 million children whose households are eligible for CTC.

The best available causal evidence for what proactive outreach can do for non-filers comes from a randomized IRS mailing experiment, where letters were sent to likely non-filers and found that among those who were newly induced to file through this

[112] Jess Maneely and Zoë Neuberger, "Matching Data across Benefit Programs Can Increase WIC Enrollment," Center on Budget and Policy Priorities, April 27, 2021, https://cbpp.org/research/food-assistance/matching-data-across-benefit-programs-can-increase-wic-enrollment.
[113] Tax Policy Center, "Do All People Eligible for the EITC Participate?" *Tax Policy Center Briefing Book*, last modified January 2024, https://taxpolicycenter.org/briefing-book/do-all-people-eligible-eitc-participate.
[114] "2.3 Million Low-Income Children are at Risk of Being Left out of the Child Tax Credit," Economic Security Project, June 3, 2021, https://economicsecurityproject.org/resource/2-3-million-low-income-children-are-at-risk-of-being-left-out-of-the-child-tax-credit.



intervention, 43 percent claimed the EITC, averaging $861, and 29 percent claimed the Child Tax Credit (CTC).[115] A single mailed letter is a much lighter-touch intervention than our combination of simplified non-filer portal, proactive Notify.gov text outreach, and expanded in-person, benefits-navigation support with community-based organizations, so we treat this as a conservative basis for the estimate. Assuming a 43 percent take-up rate and reaching at least 25 percent of the non-filers who are eligible for EITC and CTC, we estimate that our road map could yield 521,500 new claims for EITC and CTC, worth roughly $468 million. This should be treated as the floor and could be significantly higher due to the much higher-touch nature of our intervention.

Estimated Impact

	Total New Claims	Additional Benefits Delivered
EITC Take-Up	354,750	$305,439,750
CTC Take-Up	166,750	$162,748,000
Total	**521,500**	**$468,187,750**

The table below summarizes how the road map expands enrollment and benefits delivered. Most represent people newly enrolled and new benefits dollars delivered—capturing a portion of the $227 billion in congressionally mandated benefits that go undelivered today. Automating Medicaid administrative renewals represents coverage and dollars retained that would otherwise be lost to red tape.

Road Map Lever	People Impacted	Benefits Dollars Delivered
100% adoption across all states plus DC of Broad-Based Categorical Eligibility in SNAP	546,957 new SNAP enrollees	$1,235,575,863
Auto-enrolling SSI recipients in Medicaid	326,359 people enrolled in Medicaid, no application required	$6,713,855,291
Keeping eligible people enrolled by automating more Medicaid administrative renewals	5,109,298 people retain coverage	$40,409,435,106 (These are benefits *retained.*)
Refundable tax credits take-up through public-option non-filer portal and proactive outreach	521,500 non-filers claim EITC and CTC	$468,187,750
Total	**6,504,114**	**~$49B/year**

[115] Jacob Goldin et al., "Tax Filing and Take-Up: Experimental Evidence on Tax Preparation Outreach and Benefit Claiming," *Journal of Public Economics* 206 (2022): 104550, https://sciencedirect.com/science/article/abs/pii/S0047272721001869.

Expanding Reach: ~18 Million Additional People Get Direct Help Claiming the Benefits They're Eligible For

Direct File. Before its future was thrown into question, the Direct File product team's internal modeling projected a clear path to significant scale. Starting from the 140,000 returns filed in the 2024 pilot, a 0.9 percent take-up rate among the 15.4 million eligible tax units in participating states, the team's own projections showed usage climbing to 1 million returns in 2025, reaching 2.7 million in 2026, achieving what the team called "baseline maturity" at 7.3 million returns (a 10 percent take-up rate) in 2027, and growing to 9.3 million returns (12 percent take-up) in 2028.[116] These projections assumed Direct File would become the default option gradually, alongside a slower state-by-state rollout year over year.

Our road map proposes reaching genuine default status within the first year of a new administration, through expanding the scope of Direct File to gig and 1099 workers, developing of a simplified non-filer portal, conducting proactive outreach and messaging through Notify.gov, and supporting in-person benefits navigation with community-based organizations. Taking the product team's own 2027–28 projected range, 7.3 to 9.3 million returns filed, as a conservative basis for what our accelerated strategy could achieve and adding the non-filer portal's targeted reach of at least 25 percent of the estimated 5.6 million non-filers eligible for EITC and CTC, we estimate Direct File and the non-filer portal together could reach up to 10.7 million users a year at full maturity.

Community delivery capacity. Our road map proposes training and certifying VITA volunteers, CAA staff, libraries, and other community-based organizations to also help their clients enroll in other public programs such as SNAP, Medicaid, WIC, and other public benefits programs. We also propose certifying new sites for this role: 5,000 library branches and 9,500 additional VITA sites, doubling VITA's current footprint. This results in a total of 25,000 sites serving as certified benefits navigators. The IRS's VITA program completed approximately 2.8 million returns across roughly 9,500 sites in 2025, a productivity rate of 295 returns per site.[117] Applying that productivity rate to our 25,000 benefits-navigator sites yields an estimate of approximately 7.37 million people receiving in-person benefits navigation support a year.

Taken together, Direct File's expanded reach and expanded community delivery capacity suggest that this road map could expand direct-service delivery capacity to reach approximately 18 million additional people per year.

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[116] Zucker and Given, *Future of Tax Filing*.
[117] Internal Revenue Service, *Quality Statistical Sample Review Results for SPEC Partners and Employees*, Publication 5347 (Rev. 7-2025), https://irs.gov/pub/irs-pdf/p5347.pdf.

Reducing Wasteful Government Spending: $6 Billion Redirected from Duplicative Contractor Spending to Benefits Delivery and Taxpayers' Own Pockets

The same handful of commercial vendors builds and rebuilds much of the government safety net's backend infrastructure, at an aggregate cost in the billions of dollars per year. Federal and state agencies spend a total of $9 billion annually on Medicaid eligibility and enrollment systems, 82 percent of it flowing to contractors like Deloitte, Accenture, and Optum.[118] The people these systems serve are worse off for it. Deloitte-run Medicaid systems have wrongfully denied benefits to disabled Michiganders, and states remain locked into renewing contracts with these same under-delivering vendors because the market for these services and infrastructure is so concentrated.[119]

Every public option component in the road map, and every government agency (federal, state, local) that adopts these components, redirects that money toward infrastructure that the government owns and can improve, and reduces the leverage that these companies hold over how benefits get delivered.

Login.gov and Notify.gov adoption. GAO identified $209 million in current federal spending on commercial identity verification solutions like ID.me.[120] Our road map's target of Login.gov and Notify.gov as the default identity-verification and notifications solutions for every in-scope federal agency would consolidate the bulk of that spend into government-owned platforms and contracts, as opposed to dozens of agencies separately negotiating their own contracts with commercial vendors. Though Login.gov itself relies on commercial subcontractors for various aspects of its functionality, it is a government-owned platform that the public can hold accountable. Even a conservative 75 percent shift redirects roughly $157 million a year toward a consolidated, more publicly accountable model.

Before Notify.gov was shut down last year, the program estimated roughly $350 million per year in cost avoidance across 13 federal agencies, sending over 400,000 messages in about 20 languages.[121] Expanding to three times that agency footprint and assuming costs and reach scale roughly linearly with agency count (an oversimplification given

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[118] MACPAC, *State Medicaid Enterprise Systems*, issue brief, July 2026, https://macpac.gov/wp-content/uploads/2026/07/Issue-Brief-State-Medicaid-Enterprise-Systems-FINAL.pdf.
[119] Rachana Pradhan, Samantha Liss, and Kate Wells, "A Deloitte-Run System Denied Medicaid Benefits for Michigan's Disabled. Now Trump's Law Piles On." *KFF Health News*, July 21, 2026, https://kffhealthnews.org/health-industry/deloitte-medicaid-eligibility-system-denials-michigan-trump-policy-piles-on.
[120] US GAO, *Identity Verification: GSA Should Demonstrate Its Implementation of Policies for Testing Data Backups on Login.gov*, GAO-25-107000, June 3, 2025, https://files.gao.gov/reports/GAO-25-107000/index.html.
[121] GSA Public Benefits Studio, *Story of Notify.gov*.

how much agencies vary in size) yields approximately $1.05 billion per year in cost avoidance.

Our road map also calls for all 50 states plus DC to integrate their Medicaid, SNAP, and UI portals with Login.gov and Notify.gov. The scale of state-level spending on commercial solutions for identity verification and notifications can be substantial, even in a single state and program. Arizona's Department of Economic Security paid ID.me just over $1 million for unemployment insurance identity verification alone.[122] This type of spending is not centrally tracked or disclosed the way Medicaid technology spending is, but this one data point suggests that the scale of state agencies moving away from commercial identity verification and notification products that the road map targets could result in a meaningful multiple of the federal numbers described above being redirected to public options.

Public option income verification. Commercial income-verification vendors extract significant, and growing, sums from government budgets. States collectively spend as much as $362 million on these vendors, per an internal analysis led by the Institute for Responsive Government.[123] By another estimate, Equifax's The Work Number, the dominant player in the market, is part of a broader government income- and employment-verification market worth roughly $800 million a year in federal and state government contracts combined. The road map's wage ingestion and validation service, when adopted by all 50 state UI agencies and DC, targets this dependency on commercial solutions.[124]

Public option eligibility determination. States currently spend at least $2.81 billion a year nationally on Medicaid eligibility and enrollment (E&E) systems alone.[125] The same small set of vendors dominates this market. Kentucky pays Deloitte more than $157 million over five years to run its integrated eligibility system. Vermont pays Optum $125.6 million. Iowa pays Accenture more than $60 million.[126] We see this same concentrated market across other government programs as well. Michigan signed a $78 million, 10-year contract with Deloitte in 2022 to replace its Unemployment Insurance

[122] Monica Williams and Joe Ducey, "ID.me Paid More Than $1M by the State Without Going Through Traditional Bidding Process," ABC15 Arizona, May 3, 2021, https://abc15.com/news/let-joe-know/id-me-paid-more-than-1m-by-the-state-without-going-through-traditional-bidding-process.
[123] Institute for Responsive Government (IRG), unpublished material shared directly with the author.
[124] Ferrell, "Means-Testing Industrial Complex."
[125] MACPAC, *State Medicaid Enterprise Systems*.
[126] Samantha Liss and Rachana Pradhan, "States Pay Deloitte, Others Millions to Comply with Trump Law to Cut Medicaid Rolls," *News from the States*, April 5, 2026, originally published by *KFF Health News*, https://newsfromthestates.com/article/states-pay-deloitte-others-millions-comply-trump-law-cut-medicaid-rolls.

system.[127] During the pandemic-era modernization push, 11 states spent $173.8 million combined on UI system contracts with Accenture, Deloitte, and EY.[128]

The road map's target of 40 state agencies across 25 states adopting the public option eligibility determination component, covering multiple programs, would put a meaningful share of this multibillion-dollar spending in scope for redirection. States don't report these costs consistently enough programs like Medicaid, SNAP, UI, and other programs, but the Medicaid E&E and UI systems spending data described above represent a floor for how much could be redirected from the fragmented, duplicative contracts agencies hold with the Deloittes and Accentures of the world and reinvested into the public option, government-owned digital infrastructure platform.

Direct File (public option tax filing). Unlike the mechanisms above, Direct File's savings accrue to taxpayers rather than government budgets, because it means taxpayers aren't paying commercial tax-prep monopolies like Intuit and H&R Block to file their taxes. The average cost to file with a paid preparer is approximately $160. At the road map's projected 7.3 to 9.3 million Direct File users a year, that represents $1.168 billion to $1.488 billion a year staying in people's pockets rather than lining the coffers of commercial tax-prep companies.

Together, these public option alternatives redirect billions of dollars a year away from fragmented, duplicative commercial contracts and concentrated markets. Most of that money moves within government budgets, from contracts directly with companies like ID.me, Deloitte, and Equifax, toward public option infrastructure that the government owns and controls. Direct File is the exception in that its savings stay with taxpayers.

Estimated Impact (Rough Order of Magnitude)

Public Option Component	Dollars Redirected from Fragmented Commercial Contracts
Identity Verification (Login.gov)	$157,000,000
Notifications (Notify.gov)	$1,000,000,000
Income Verification	$800,000,000
Eligibility Determination	$2,800,000,000
Direct File	$1,488,000,000 (consumer savings, not government spending)
Total	**$6,245,000,000**

[127] Colin Wood, "Michigan Selects Deloitte for $78 Million Unemployment System Upgrade," *StateScoop*, November 16, 2022, https://statescoop.com/michigan-deloitte-unemployment-system-2022-78-million.
[128] Chris Marr and Alex Ebert, "Deloitte, Others Reap Big Contracts from Unemployment Deluge," *Bloomberg Law News*, July 29, 2020, https://news.bloomberglaw.com/tech-and-telecom-law/deloitte-others-reap-big-contracts-from-unemployment-deluge.

Chapter 6: Risks to Mitigate

This road map is meant to reach more people with less friction and verify eligibility more automatically. However, moving toward a more automated safety net can exacerbate some existing problems. This chapter names and offers ways to mitigate them.

Eroded trust in the federal government puts the entire premise of faster, more automated benefits enrollment and delivery at risk. Trust in the federal government is at an all-time low. As of late 2025, only 17 percent of Americans said they trust the federal government to do what is right "just about always" or "most of the time," down from 22 percent the year before and among the lowest levels recorded in nearly seven decades of polling.[129] The Trump administration has given people concrete reasons to distrust it. Since 2025, the State Department has eliminated the option to list "X" as a passport sex marker and now requires transgender applicants to list their sex assigned at birth, and the Department of Justice has issued subpoenas to doctors and clinics demanding the names, dates of birth, Social Security Numbers, and intake forms of patients tied to gender-affirming care.[130] In this climate, handing government agencies faster, more connected access to one's information, even when the stated purpose is to get the benefits you are owed, may not be worth the risk. Policymakers and government agencies must build systems and processes that repair this broken relationship between the government and the American people.

Mitigations:

- The digital infrastructure platform's design principles (see Chapter 4) do not fully prevent an administration from weaponizing benefits data for surveillance and enforcement—but they are built to raise the cost and visibility of doing so. No technical architecture can truly stop an administration willing to compel access, but it can put more friction into that process. Data minimization and zero-trust architecture limit what data is available to be misused, such that no system holds more data than is needed for its discrete purposes and no system trusts another by default. Deletion on request lets people ask that their data be purged from systems that have touched or stored their data, rather than relying on a default retention window. And use of the platform should be continuously audited for adherence to the design principles, with real penalties for noncompliance. These principles offer checks and balances for how the platform is used and how individuals can protect themselves.

[129] "Public Trust in Government: 1958-2025," Pew Research Center, December 4, 2025, https://pewresearch.org/politics/2025/12/04/public-trust-in-government-1958-2025.
[130] Katelyn Ringrose et al., "Gender Politics and the Weaponization of Personal Data," Tech Policy Press, December 22, 2025, https://techpolicy.press/gender-politics-and-the-weaponization-of-personal-data.

- Community-based organizations as benefits navigators allow people to interface with the government through a channel they actually trust. These navigators can also operate as an early-warning system and a check against government overstepping. A trained community member may notice a form is asking for something it shouldn't, like a household member's immigrant status, and can advise the applicant on whether they can decline to answer. They can also flag the form to the benefits-navigator certifying body so that the agency who owns it can address it. Furthermore, they can help people understand and use the privacy protections built into the platform, like requesting their data be deleted.

Mixed-status households and automatic enrollment. Faster, more automatic enrollment can pose a real risk to households with mixed citizenship statuses, because a citizen household member's enrollment in a benefits program could create a paper trail to a noncitizen member of the household. This information, in the wrong hands, can cause these families real harm.

The stakes of that exposure are especially high right now. In July 2026, the Department of Homeland Security issued a final rule that grants its officers "almost unlimited discretion" to weigh a household's use of public benefits in deciding whether a noncitizen applying for a green card or admission to the US is likely to become a "public charge," or dependent on the government in the future.[131] That is a separate legal mechanism from data being exposed to enforcement, but it is part of the hostile climate that makes protecting mixed-status families' data matter so much right now.

Mitigations:

- **Test every feature against this question before it goes live:** If an administration decided it wanted this data for a purpose it wasn't originally collected for, would this feature make it easy or hard to do that? Every automated pre-fill, cross-agency data match, or no-touch enrollment component this road map enables should be stress-tested against this question before it goes live.
- **Preserve the ability to opt out, without creating a new way to find mixed-status households.** Where a system would otherwise sign someone up automatically, it should default to an affirmative opt-in step when it detects or cannot rule out that a household includes both citizens and noncitizens. The system should be architected such that it cannot keep a list anywhere of "the households we think are mixed-status." The way to avoid that: make the yes-or-no decision using the same privacy-protecting technology already built into the digital infrastructure platform, so that the decision gets made and used

[131] Joan Alker, "Trump Administration Issues Final Public Charge Rule, Ignores Public Comments on the Harm to Children," Georgetown University Center for Children and Families, July 24, 2026, https://ccf.georgetown.edu/2026/07/24/trump-administration-issues-final-public-charge-rule-and-ignores-public-comments-on-the-harm-to-children.

in the moment, without it being stored afterward. A step further could add the opt-in step to a random sample of other households, so that an outside observer watching enrollment patterns cannot reliably tell which households were flagged as mixed-status vs. randomly offered the opt-in. This means some families won't get the more automated, zero paperwork experience, but it may be a trade-off worth making to avoid putting anyone at legal risk without their knowledge.

- **Architect who gets access directly into the system—but recognize the limits of that architecture.** The privacy-enhancing data infrastructure and protocols baked into the digital infrastructure platform allow a data-owning party to granularly control which parties and what data can be seen or used for verification checks. For example, a state UI agency controls what a state Medicaid agency can and can't learn from its own wage data. This only works when the party setting the rules and the party being restricted are actually different from each other. It breaks down when a single administration controls both ends, since whoever controls the system can simply rewrite the permission rules themselves. This is why the digital infrastructure platform is designed as a catalog of reusable components that other agencies buy and integrate into the systems they themselves own and operate. However, this protection is narrower for agencies that choose the federally hosted version of the digital infrastructure platform. These agencies would still be relying on the same privacy-enhancing protocols to keep the federally hosted system from holding their raw data, but a hostile administration could, in theory, change how it responds to a subscribing agency's queries in a way it couldn't do to an agency running its own instance. To truly close the remaining gap, Congress must state plainly, in statute, and enforce that data collected to administer benefits cannot be repurposed for any other action, regardless of which agency's investigative authority is invoked to request it and whether that data sits in an agency's self-hosted system or a federally hosted one.
- **Coordinated outreach campaign.** HHS, USDA, and DOL should issue explicit public guidance on exactly which programs and which household members' benefit receipt can be weighed in a public charge determination, and work with CAA and other community organizations to coordinate an outreach and education campaign to counter the chilling effects of this public charge policy.

Benefit cliffs become more visible and more immediate. A benefit cliff is the point where earning even a little more money causes someone to lose a benefit or have it cut so sharply that they end up with less total income than before the raise. Moving to faster, more frequent income verification means a recipient finds out almost immediately when a raise pushes them off a benefit cliff, instead of getting a temporary buffer before the system catches up to the change in their income.[132]

[132] Angela Rachidi et al., *Stranded by the Safety Net: How to Fix the Benefit Cliff Problem* (American Enterprise Institute, 2025), https://aei.org/research-products/report/stranded-by-the-safety-net-how-to-fix-the-benefit-cliff-problem.

Mitigations:

- Direct agencies to give beneficiaries a transition period before a change in their financial circumstances costs them to lose a benefit outright. Transitional Medical Assistance is a mandatory Medicaid provision that does exactly this, by giving working parents up to 12 months of continued Medicaid coverage so that a raise doesn't cost them their coverage outright. Every safety net program should have an equivalent transition period.
- Build graduated benefit-reduction features into the Eligibility Rules Engine and make them a default feature. For example, the engine could consider a short income-averaging window rather than make a determination from a single high pay period.[133]

Benefit cliffs compound for people enrolled in multiple programs. Most programs calculate eligibility in a vacuum, with no system checking whether a change driven by their processing impacts a person's benefits in other programs. To add to that, each program has differing definitions of what counts as income, and that impacts the benefit amount a person receives across multiple programs. For example, Supplemental Security Income takes a maximalist approach to defining income, counting other benefits toward one's income, and factors this into their SSI benefit amount nearly dollar-for-dollar. This creates an adverse effect where a gain in one program can create unintended loss in another. More automated benefits and real-time data verification could potentially exacerbate this issue.

Congress has already legislated one specific fix for this problem in 26 U.S.C.§6409, which excludes federal tax refunds such as EITC and CTC from counting as income or resources for any federal means-tested program for 12 months after receipt. This legislation was specifically designed to prevent a refundable tax credit from pushing someone over an asset limit for SSI or TANF. Beyond legislative fixes, some technology mitigations could address this problem.

Mitigations:

- **Build the Eligibility Rules Engine to be interaction-aware.** Before it finalizes a benefit or program determination, it should check whether the household is enrolled in other programs where the change could trigger a corresponding loss. This can be implemented using the privacy-preserving query model proposed for

[133] Peter Ganong et al., "The Impact of Pay Period Reporting on Improper Redeterminations for Medicaid: Problems and Implications for Implementation," Becker Friedman Institute for Economics at the University of Chicago, July 21, 2026, https://bfi.uchicago.edu/insights/the-impact-of-pay-period-reporting-on-improper-redeterminations-for-medicaid-problems-and-implications-for-implementation.



income verification. The rules engine should then return its findings to the end-user (for example, a caseworker or the applicant/enrollee).
- **Direct agencies to use existing regulatory authorities** to make their programs' income-counting rules more generous—e.g., exclude federal benefits from counting against eligibility.

Increasing uptake may cause state budgeting issues that our road map doesn't fully solve for. Take Medicaid, for example. Under its cost-sharing structure, states cover anywhere from 18 to 50 percent of the cost of covering everyone in the traditional Medicaid population—the population Medicaid has always covered, as opposed to the additional adults states can choose to cover under the Affordable Care Act (ACA)—with the exact share dependent on a state's income level. That means that every eligible person a state successfully keeps enrolled is a direct cost on that state's own budget, as well as the federal government's. The one meaningful exception is the ACA expansion population, of which the federal government covers 90 percent of the cost, so a state's added cost per person for that population is much smaller. A version of this problem is now opening up for SNAP as well. Starting in FY 2027, H.R. 1 dramatically reduces the federal government's share of the cost of running state SNAP programs and delivering direct food benefits to enrollees.

Mitigations:

- Existing federal levers, like SNAP's Process and Technology Improvement Grants, are competitive but modest. These levers can reward early adopters of the road map, but cannot offset the structural cost that each state faces as it increases uptake of programs and benefits.

Unfortunately, this road map doesn't have a clean fix for this. The most straightforward and direct solution is to have the federal government cover more of a state's cost specifically when that state improves uptake—but this requires Congress to appropriate new funds to support this. A future administration should tackle this head-on, and pursue congressional action.

Chapter 7: Congressional Actions to Codify the Road Map

This road map is deliberately built to be executable using existing legal authorities and flexibilities. But a guidance memo only survives until the next one comes along. An operational program with no statutory footing survives only as long as political will exists. So it's worth highlighting what congressional actions an administration should push for to make the road map and its expected impacts more durable. What follows is



not a legislative agenda but rather a brief list of specific actions Congress should take to lock in the outcomes and successes of the road map.

Make Direct File permanent, with its own dedicated funding. Congress could enact a statute to establish Direct File as a permanent, free electronic-filing option, along with a multiyear or permanent, mandatory appropriation specific to Direct File.

Require the uptake-and-admin-overhead scorecard by statute. The Payment Integrity Information Act of 2019 already requires every agency to estimate and publish payment accuracy data with independent inspector-general audits and consequences for repeat noncompliance. Congress could pass a direct companion statute requiring this same rigor and ongoing funding, but for uptake rates and admin-overhead ratios. That statute should carry real sticks and carrots. On the carrot side, states that hit strong uptake targets or meaningfully improve their administrative overhead should receive a funding bonus. On the stick side, the penalty for noncompliance or poor performance should be losing access to enhanced federal match dollars. In addition, poorly performing states should be made to send a senior official to testify before the relevant congressional oversight committee, and the state's program leadership must include firsthand testimony from people harmed by that state's poor performance as part of the hearing record.

Set a statutory purpose-limitation floor for benefits verification data. The Privacy Act of 1974 is too broad today in its exceptions and exacerbates the risk of cross-agency data sharing for extraneous purposes.[134] In 2025, the Social Security Administration, Treasury, IRS, and the Office of Personnel Management invoked these exceptions to justify sweeping data access for so-called Department of Government Efficiency–affiliated staff, arguing that broad access qualified as a "need to know" for their duties.[135] As Chapter 6 lays out, a narrower, benefits-specific statute must state plainly that data collected to administer benefits cannot be repurposed for any other action, regardless of which agency's investigative authority is invoked to request it, and regardless of whether that data sits in an agency's self-hosted system or a federally hosted one. Codifying that with accompanying enforcement would lock in the road map's zero-trust design principles and protect people who are simply trying to get the economic relief they are entitled to.

Codify the digital infrastructure platform's compliance audits and penalties by statute, and assign audit authority to GAO, a legislative branch agency that continues to operate and publish findings independent of the executive branch it may be auditing. Every agency's use of the platform must be continuously audited for adherence to its

[134] Congressional Research Service, *The Privacy Act of 1974: Overview and Issues for Congress*, CRS Report R47863, December 7, 2023, https://congress.gov/crs-product/R47863#ifn92.
[135] Congressional Research Service, "Privacy Act Lawsuits and the Department of Government Efficiency (DOGE)," Legal Sidebar LSB11370, September 17, 2025, https://congress.gov/crs-product/LSB11370.



design principles, with real statutorily defined penalties for noncompliance that trigger automatically on an audit finding. Like the uptake-and-admin-overhead scorecard, that only holds up if it's required by law rather than left to an agency's discretion. Congress should extend the same statutory audit-and-enforcement model it already uses for payment integrity and that we propose for the scorecard above. GAO should independently, regularly audit whether an agency's implementation of the platform follows the platform's zero-trust, data minimization, deletion-on-request, and purpose-limitation principles. Audit findings should result in automatic loss of access to federal discretionary funding and a mandatory hearing before the relevant congressional oversight committee and Inspectors General. No statutory design can fully guarantee compliance from an administration determined to bulldoze through it, but placing audit authority outside the executive branch and making penalties automatic helps.

Federal support of public option income verification and other digital infrastructure. Congress could require, by statute, that employers report wages every pay period rather than quarterly. This is the same shift that the UK made in 2014 when its tax revenue agency's Real Time Information system began requiring a payroll report each time an employer pays its staff, rather than once a year. The UK's Department of Work and Pensions now uses that data feed to calculate Universal Credit amounts automatically every month without claimants having to self-report their pay at all.

A comparable mandate, run through the federally mandated, state-administered Unemployment Insurance program, would give the reusable income verification service in the road map the comprehensive, near-real-time wage data that a purely voluntary, state-by-state rollout can't match. Getting all states to implement pay period reporting through their UI program would provide the scale needed for a real public option alternative to commercial products like Equifax's The Work Number, whose advantage rests on payroll access built over decades.

The same need for federal legislative backing and funding applies to the other shared digital infrastructure in the road map. Each faces the same adoption challenges that income verification does and deserves federal support to reach real scale.

Increase SNAP's Process and Technology Improvements Grants (PTIG) and index them to inflation. PTIG is one of the few existing federal funding streams that states can draw on today to modernize SNAP systems, but it has been capped at $5 million a year, split competitively across 6 to 12 state agencies, since at least FY 2016. Congress should raise the base appropriation and index it to inflation going forward, so that states can actually use PTIG to offset their costs to implement the road map.

Give CSGB's trusted-agent role the same statutory permanence Congress has already given VITA, and fund it accordingly. VITA existed for decades as a discretionary IRS

grant program until the 2019 Taxpayer First Act codified it permanently into the tax code.[136] CSBG itself has not been reauthorized since its authorization lapsed at the end of FY 2003. Congress has funded it through annual appropriations every year since, without actually renewing the underlying statute. That long-overdue reauthorization, yet to be scheduled as of this writing, is the natural vehicle to do the same for the benefits-navigation role that CAAs should formally take on. This should be paired with a funding increase to account for the new responsibility CAAs are taking on.

Create a Department of Economic Relief Programs and Services. A recent proposal for restructuring how the federal government operates calls for a Cabinet-level Department of Services, a single department consolidating government-wide management functions currently split across the Office of Personnel Management, the General Services Administration, and OMB's own management offices, under one accountable Chief Operating Officer.[137] We propose an office scoped specifically to oversee delivery of economic relief programs, including but not limited to SNAP, Medicaid, TANF, unemployment insurance, and refundable tax credits. This organization's mission would be to marshal policies, resources, and investments across every agency that touches those programs toward higher uptake and lower administrative overhead. This could also include standardizing definitions for key eligibility criteria across programs. This department should have the power to reward agencies that hit uptake and overhead targets and penalize those who miss them. This keeps incentives aligned on outcomes, rather than process compliance. This department would play a standard-setting role, not a data-holding one. The department would define thresholds, criteria, and policies, not receive or store wage data or other Personally Identifiable Information. States would continue to hold and administer their own program data, and would apply the standards set by this department.[138]

Today, the Office of Information and Regulatory Affairs (OIRA), a statutory office within OMB, reviews and approves federal information collection under the Paperwork Reduction Act (PRA). OIRA has a fast-track "umbrella clearance" framework for

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[136] Taxpayer First Act, H.R. 3151, 116th Cong. (2019), https://congress.gov/bill/116th-congress/house-bill/3151.

[137] Amira Boland and Tara McGuinness, "Reinvention Blueprint No. 1: A Government That Works for People," *Just Security*, August 11, 2026, https://justsecurity.org/149053/reinvention-blueprint-no-1-government-works-for-people.

[138] Arabella Crawford and Christopher Whitaker, *Standard Definitions: Reducing Administrative Burden by Ensuring Interoperability* (Searchlight Institute, 2026), https://searchlightinstitute.org/research/standard-definitions-reducing-administrative-burden-by-ensuring-interoperability. This distinction matters more once pay-period wage reporting is in place. State agencies already redetermine eligibility using information already in their own possession. If wage data starts arriving every pay period instead of quarterly, a single anomalously high paycheck (e.g., overtime, a bonus) could trigger redetermination and force a recipient to document continued eligibility. The standards that this department sets should account for this—for example, by requiring a change to hold across more than one pay period before it counts it as a qualifying change in circumstances.

streamlining PRA approval at the department-level, which could easily be extended to benefits-related collections.[139] This new department should work with OIRA to secure standing umbrella clearances across the economic relief programs under its purview.

Stand up a Department of Public Option Products and Services, a distinct entity separate from the Department of Economic Relief Programs and Services described above—which would be a primary customer of this department but not its only one. Any government agency building any service, public-facing or not, could benefit from using public option products and services. Today, the identity verification, income verification, eligibility rules engine, notifications, and privacy-preserving data-sharing components this paper proposes have typically lived within GSA's Technology Transformation Service, which has no statutory footing of its own. That's why 18F could be eliminated and Notify.gov could be shut down by an internal staffing deficit, with no public vote or change in law. The US should aspire to the UK's Government Digital Service (GDS)—a Cabinet Office specifically designed to steward public digital infrastructure such as GOV.UK Notify, which GSA's own team explicitly built Notify.gov on top of, and GOV.UK One Login, the UK's identity-verification equivalent to Login.gov. GDS owns and maintains both products. A Department of Public Option Products and Services, created by statute and funded appropriately, would give the technology lever in the road map the kind of protected institutional home that GDS gives the UK's.

Congress should also give this new department blanket statutory authority to make its products and services available to any State, Local, Tribal, or Territorial government (SLTT). As it stands today, only Login.gov is available to SLTT, through the Intergovernmental Cooperation Act. GSA's other public option products, such as Cloud.gov and Notify.gov, have historically only been available to other federal agencies and have faced challenges in securing the same legal footing to reach SLTT agencies. An umbrella statutory grant covering the department's entire product catalog would address this issue.

Bigger Swings That Congress Could Take

In the course of our research, we heard a number of bolder ideas that would likely require congressional action to implement. We share them here so that the field can continue to develop and debate ways to move toward a more user-friendly, truly automated, and universal government benefits system.

Community-based eligibility. The same logic behind the Community Eligibility Provision—treat an entire community as eligible once enough of its members are

[139] US Office of Management and Budget, "Section 280 - Managing Customer Experience and Improving Service Delivery," in *OMB Circular No. A-11* (Executive Office of the President, 2022), https://performance.gov/cx/assets/files/2022-OMB-Circular-A11-Section-280.pdf.

already known to qualify, rather than means-testing each person individually—could extend well past school meals. LIHEAP could cover everyone living in a zip code with an average income below a set threshold. SNAP could cover everyone in a zip code that is designated a food desert. Childcare assistance could work the same way for zip codes below an income threshold. Each version would need its own eligibility formula and an answer for how to handle above-threshold households inside a qualifying area and below-threshold households outside a qualifying area—but the school-meals precedent shows that the basic mechanisms can run at national scale without collapsing into fraud or unsustainable cost.

Universal enrollment. Every child could be automatically enrolled in CHIP at birth and remain covered through age 26, with coverage becoming secondary any time a family also carries private insurance. A real precedent for this kind of no-individual-application-necessary coverage already exists in federal policy. The National School Lunch Program's Community Eligibility Provision lets any school in which at least 25 percent of students are already identified as low-income through SNAP, TANF, or similar programs serve free meals to every enrolled student, with no household application required at all. More than 55,000 schools serving 27.6 million students now operate this way.[140]

Extending that same logic to children's health coverage would be a much bigger step. It would mean making provider participation mandatory (it is voluntary today), having CMS build shared, open source billing and compliance tools so providers can plug CHIP claims into their existing electronic health record systems, and identifying a funding mechanism. One option raised was a penalty on employers with more than 50 workers (contracted or W-2) that don't offer benefits or a living wage, similar in spirit to the ACA's employer mandate.

Automatic enrollment at key moments. Unemployment insurance is a natural candidate for automatic enrollment at the moment of a mass layoff. In specific scenarios, the Worker Adjustment and Retraining Notification (WARN) Act requires employers to notify a state's Dislocated Worker Unit before a mass layoff.[141] Today, that notice triggers rapid-response support services, but the laid-off worker still has to separately file their own UI claim. That same WARN notice could pre-populate or even auto-file a UI claim for every named worker. One idea raised in our research conversations was to deputize unions and labor organizations to help manage that handoff directly, given their existing relationships with affected workers.[142] For situations where the WARN Act is not triggered, our road map's proposal of a

[140] Food Research & Action Center, "Community Eligibility," last modified September 1, 2026, https://frac.org/community-eligibility.
[141] US Department of Labor, Employment and Training Administration, "WARN Act Compliance Assistance," accessed August 30, 2026, https://dol.gov/agencies/eta/layoffs/warn.
[142] Alexander Hertel-Fernandez, "A Solidarity Net, Not a Safety Net," *Democracy Journal* 80 (Spring 2026), https://democracyjournal.org/magazine/80/a-solidarity-net-not-a-safety-net.

continuous, employer-fed wage-reporting pipeline can fill that gap. Once employers are reporting wages every pay period instead of quarterly, a state UI agency's systems can flag when someone's wages stop appearing and treat that the same way it would treat a WARN notice.

Natural disasters and national emergencies are also good candidates, and COVID-19 is the clearest example of that. After the president declared COVID-19 a national emergency in spring 2020, the IRS worked with Treasury and SSA to deliver Economic Impact Payments automatically, using existing tax return data and cross-agency data sharing to maximally reach those eligible for the payments—with no application required from individuals at all. As another example, the IRS already provides tax and payment relief to people living in areas impacted by natural disasters, also without individuals applying directly. When the president issues a major disaster declaration, the Federal Emergency Management Agency (FEMA) notifies the IRS of the affected areas, and the IRS automatically flags any taxpayer whose address of record falls within the declared zip codes as eligible for filing and payment relief, without that taxpayer having to apply.[143] The same address- and record-matching approach applied to COVID relief and IRS tax postponements could be extended to other economic relief programs.

Chapter 8: Conclusion

Congress has enacted programs entitling eligible Americans to food assistance, health coverage, unemployment insurance, tax credits, and more. Yet these programs vastly underperform in actually delivering economic relief to the people entitled to those benefits. This paper argues that a future pro-democracy administration can close that gap, in a single four-year term, using authorities that it already has. Chapters 3 through 6 outline how: by building a public-option digital infrastructure platform to power the systems that support benefits administration at all levels of government, and a road map of concrete mechanisms that together could deliver tens of billions of dollars of relief to millions more people, without waiting on Congress.

But an administration can only plant so much. Chapter 7 is where this road map turns what one administration can do into what Congress should do, because our vision for a safety net that is genuinely automatic, paperless, and applied to everyone who is eligible cannot be built through executive action alone. It requires durable funding, real enforcement, and institutions built to outlast a four-year presidential term. Chapter 7 goes further still, toward a reimagined safety net that truly meets the needs of the American people.

[143] Internal Revenue Service, "Tax Relief in Disaster Situations," last reviewed September 16, 2026, https://irs.gov/newsroom/tax-relief-in-disaster-situations.

Organizers in the civil rights tradition have long understood that the work of building a more just, equitable, and prosperous country is intergenerational. You plant seeds you may not live to see bloom, with the hope that people who come after you will get to harvest what you planted. We hope the road map this paper outlines is seed enough for one administration to act on immediately. The congressional actions and the bigger swings in Chapter 7 are the seeds for the advocates, technologists, and lawmakers who pick this work up next. This road map would give that work solid ground to grow out of.



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