Minnesota Association of County Social Service Administrators

What Policy Makers Need to Know About Administrative Simplification

Key Messages for MACSSA Members

Simplification, Uniformity and Alignment of Eligibility Processes:

- Will result in better customer service and enhanced client outcomes.
- Is an essential step in advance of human services technology systems modernization.
- Will provide administrative cost avoidance, improve error rates, and enhance program integrity.

Administrative Simplification Will Improve Client Access and Outcomes

- Simplification, alignment and uniformity of eligibility processes will improve ease of program navigation and access for clients (who are often in crisis).
- Reducing complexity in the system will cut down on the need for clients to participate in multiple appointments to provide documentation to verify assets and income which will improve the timeliness of needed services.
- Faster receipt of needed services will result in improved outcomes and less utilization longer, more costly interventions.

Administrative Simplification, Alignment and Uniformity Will Have a Positive Impact on County Operations

- The average amount of time to recruit and train new county financial workers ranges from one to two years. Much of this training time is attributable to the complex program eligibility requirements that new staff must learn.
- County income maintenance staff spends a significant amount of day-to-day time determining and redetermining eligibility for programs. For example, an average caseload for a metro county financial worker is 320 cases, which allows for less than one half hour per case per month.
- The degree of program complexity increases the probability that errors will occur, which jeopardizes program integrity and increases the amount of time spent on administrative functions.
- To illustrate the benefits of simplification, a large county recently requested a number of new FTEs to administer the increased caseload resulting from Minnesota's expansion of the Medicaid program. The request for additional FTEs would have been almost double if not for new efficiencies built into the expansion, primarily elimination of the asset test.

New Statutory and Regulatory Requirements Increase Complexity in the Human Services System

- Since 1985, the amount of human services related statutes has more than tripled and state administrative rules has more than doubled[1]-each new statute and rule results in increased complexity.
- Legislative decisions to add or change program requirements are a major factor in program complexity. Particularly when consideration is not given to how changes will align or fit with existing program requirements.
- DHS frequently issues program procedure bulletins that county staff is responsible for implementing, adding yet another layer of complexity. Again, this is problematic when consideration is not given to how changes will align or fit with existing program requirements.
- The result is a system of convoluted rules that are increasingly unmanageable to administer.

What Can Policy Makers Do?

- Support and resource efforts to simplify and streamline human services programs in advance of implementing new technology systems. Simplified programs will help contain costs and ensure better functionality of new systems. Policy makers took a huge step toward an enhanced human services system in 2013 by financing technology systems modernization. Counties want to thank policy makers for this action and ask for continued support in this effort.
- Support recommendations to align or reduce differential treatment of income, assets, and household composition within and across programs.
- Refrain from creating additional asset and income categories for program eligibility.
- Support efforts that focus on outcomes and oppose new requirements that do not improve client outcomes.
- Focus on system wide (including local) impacts when developing and analyzing policy.

MACSSA
Minnesota Association of County Social Service Administrators

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[1] State of Minnesota, Office of the Legislative Auditor, Program Evaluation Division (January, 2007). *Minnesota Evaluation Report: Human Services Administration.* http://www.auditor.leg.state.mn.us/ped/pedrep/hsa.pdf

Program Uniformity and Simplification

It's not simple...

Why Pursue Uniformity and Simplification?

- Cash assistance programs have evolved in an uncoordinated fashion over the years.
- County workers and recipients are faced with a bewildering variety of eligibility tests and criteria.
- No public policy goals are accomplished by measuring assets or income or other standards in many different ways.
- It is confusing to recipients, difficult to administer, wasteful of public dollars, and prevents county workers from focusing on important tasks such as program integrity and assisting recipients with goals such as becoming employed.

Programs under consideration

- Minnesota Family investment Program (MFIP)
- General Assistance (GA)
- Minnesota Supplemental Aid (MSA)
- Group Residential Housing (GRH)

Items Considered

- Assets
- Earned Income Disregards
- Unearned Income Disregards/Exclusions
- Reporting
- Budgeting
- Eligibility Methodology
- Household Composition
- Temporary Absences

ASSETS

- Chapter 15 of the Combined Manual has 40 chapters on just assets. This is 45 pages and 11,863 words of differing regulations.

ASSETS

0015	ASSETS
0015.03	ASSET LIMITS
0015.06	AVAILABILITY OF ASSETS
0015.06.03	AVAILABILITY OF ASSETS WITH MULTIPLE OWNERS
0015.06.06	AVAILABILITY OF TRUSTS
0015.06.06.03	SUPPLEMENTAL NEEDS TRUSTS
0015.09	EXCLUDED ASSETS FOR SELF-SUPPORT
0015.11	EXCLUDED ASSETS - CONTRACTS FOR DEED
0015.12	EXCLUDED ASSETS - REAL PROPERTY
0015.12.03	EXCLUDED ASSETS - HOMESTEAD
0015.12.06	REPAYMENT AGREEMENTS ON REAL PROPERTY
0015.15	EXCLUDED ASSETS - HOUSEHOLD/PERSONAL GOODS
0015.18	EXCLUDED ASSETS - PENSION & RETIREMENT PLANS
0015.21	EXCLUDED ASSETS - BURIAL FUNDS
0015.24	EXCLUDED ASSETS - BURIAL CONTRACTS
0015.27	EXCLUDED ASSETS - INCOME
0015.30	EXCLUDED ASSETS - PAYMENTS UNDER FEDERAL LAW
0015.33	EXCLUDED ASSETS - STUDENT FINANCIAL AID
0015.36	EXCLUDED ASSETS - FUNDS TO FIX/REPLACE ASSET
0015.39	EXCLUDED ASSETS - VEHICLES
0015.42	EXCLUDED ASSETS - LIQUID ASSETS
0015.45	EXCLUDED ASSETS - SPECIAL GROUPS OF PEOPLE
0015.48	WHOSE ASSETS TO CONSIDER
0015.48.03 864	WHOSE ASSETS TO CONSIDER - SPONSORS W/I-
0015.48.06 134	WHOSE ASSETS TO CONSIDER - SPONSORS W/I-
0015.51	EVALUATION OF INSURANCE POLICIES
0015.54	EVALUATION OF VEHICLES
0015.57	EVALUATION OF REAL PROPERTY
0015.58	MORTALITY TABLE
0015.60	EVALUATION OF LUMP SUMS
0015.63	EVALUATION OF PENSION AND RETIREMENT PLANS
0015.69	ASSET TRANSFERS
0015.69.03	ASSET TRANSFERS FROM SPOUSE TO SPOUSE
0015.69.06	IMPROPER ASSET TRANSFERS
0015.69.09	IMPROPER TRANSFER INELIGIBILITY
0015.69.12	IMPROPER TRANSFERS - ONSET OF INELIGIBILITY
0015.69.15	MULTIPLE ASSET TRANSFERS
0015.72	EXCESS ASSETS - APPLICANTS
0015.75	EXCESS ASSETS - PARTICIPANTS
0015.78	WAIVERS OF ASSET RULES

ASSETS

- Minnesota counts over 10 categories of assets for our economic assistance programs.
- Minnesota has 4 different asset limits for 4 programs.
- Minnesota is one of 15 states that have a vehicle value asset limit (MFIP).

ASSETS

Program	Limit	Homestead	Household Goods	Vehicles	Pension Retirement	Life Insurance	Financial Aid
MFIP	$2,000 Applicant $5,000 Participant	Exclude	Exclude pets, furniture, clothing, jewelry, appliances and tools.	Exclude first $10,000 of loan value. Additional vehicles up to $7,500 loan value. Exclude if vehicle is used for self-employment; or 50% of its use produces income. Exclude one vehicle for each person with a physical disability.	Count if available in a lump sum payment.	Exclude	Exclude Pell grants, SEOG, Perkins loans, SELF loan, Guaranteed Student Loans, MN student loans, State Student Incentive Grants, MN state scholarships and grants, federal college Work Study and other financial aid funded by Title IV.
GA	$1,000	Exclude	Exclude pets, furniture, clothing, jewelry, appliances and tools.	Additional vehicles up to $7,500 loan value.	Include	Count cash value	Include as income
MSA (Follows SSI)	$2,000 Individual $3,000 Married	Exclude	Exclude	Exclude if: vehicle is used for self-employment; or 50% of its use produces income.	Include	Exclude $1,500 per person.	If HEA or BIA, exclude completely. All other exclude up to nine months if used for educational expenses.
GRH	$2,000 SSI eligible $1,000 GA eligible	Exclude	Follow basis of eligibility, GA or SSI.	Exclude one vehicle for each person with a physical disability.	Include	Follow basis of eligibility, GA or SSI	Follow basis of eligibility, GA or SSI

ASSETS

Asset Limits for Applicants, July 2010	
Georgia	$1,000
Indiana	$1,000
Missouri	$1,000
New Hampshire	$1,000
Oklahoma	$1,000
Pennsylvania	$1,000
Rhode Island	$1,000
Texas	$1,000
Washington	$1,000
Arizona	**$2,000**
Florida	**$2,000**
Idaho	**$2,000**
Iowa	**$2,000**
Kansas	**$2,000**
Louisiana	**$2,000**
Maine	**$2,000**
[redacted]	[redacted]
Mississippi	**$2,000**
Nevada	**$2,000**
New Jersey	**$2,000**
South Dakota	**$2,000**
Tennessee	**$2,000**
Utah	**$2,000**
Vermont	**$2,000**
West Virginia	**$2,000**
Kentucky	**$2,000** [10]
Illinois	$2,000/$3,000/+$50[7]
Alaska	$2,000/$3,000[1]
California	$2,000/$3,000[1]
D.C.	$2,000/$3,000[1]
New York	$2,000/$3,000[1]
Oregon	$2,500 [21]
Massachusetts	$2,500
South Carolina	$2,500
Wisconsin	$2,500
Wyoming	$2,500
Arkansas	$3,000
Connecticut	$3,000
Michigan	$3,000
Montana	$3,000
North Carolina	$3,000
North Dakota	$3,000/$6,000/+$25[20]
New Mexico	$3,500 [17]
Nebraska	$4,000/$6,000[15]
Hawaii	$5,000
Delaware	$10,000
Colorado	$15,000
Alabama	No Limit
Ohio	No Limit
Virginia	No Limit
Maryland	State has no asset test

Vehicle Exception by State, July 2010	
Georgia	$1,500/$4,650[5E]
Tennessee	$4,600[E]
Texas	$4,650 of all vehicles owned by household[25F]
Idaho	$4,650[6F]
New York	$4,650[F]/$9,300[19F]
California	$4,650[F]/one vehicle per licensed driver[3]
Oklahoma	$5,000[E]
Washington	$5,000[26E]
Indiana	$5,000[E]
Florida	$8,500[E]
Connecticut	$9,500[4E]
Wisconsin	$10,000[E]
Oregon	$10,000[E]
Massachusetts	$10,000[F]/$5,000[11E]
[redacted]	**$15,000[12F]**
New Hampshire	One vehicle per licensed driver
South Carolina	One vehicle per licensed driver[23]
Colorado	One vehicle per employed adult
Vermont	One vehicle per adult
Rhode Island	One vehicle per adult[22]
Pennsylvania	One vehicle per household
Maine	One vehicle per household
Nevada	One vehicle per household
West Virginia	One vehicle per household
Arkansas	One vehicle per household
Montana	One vehicle per household
North Dakota	One vehicle per household
Missouri	One vehicle per household[14]
Nebraska	One vehicle per household[16]
South Dakota	One vehicle per household[24]
Wyoming	One vehicle per household[27]
Illinois	One vehicle per household[8]
Iowa	One vehicle per housheold[9]
Kansas	All vehicles owned by household
Arizona	All vehicles owned by household
Louisiana	All vehicles owned by household
Michigan	All vehicles owned by household
Hawaii	All vehicles owned by household
Delaware	All vehicles owned by household
Kentucky	All vehicles owned by household
D.C.	All vehicles owned by household
Alabama	All vehicles owned by household
Ohio	All vehicles owned by household
Virginia	All vehicles owned by household
Utah	All vehicles owned by household
North Carolina	All vehicles owned by household
Mississippi	All vehicles owned by household[13]
New Mexico	All vehicles owned by household[18]
Alaska	All vehicles owned by household[2]
New Jersey	All vehicles owned by household[F]
Maryland	State has no asset test

ASSETS

- Recommendation Options
  - **Low Cost** – Allow for self-attestation. Maintain current limits and categories.
  - **Pragmatic** – Reduce asset categories to two categories, bank accounts/cash and vehicles (one vehicle per licensed driver). Increase asset limit for all programs to $5,000 or $10,000. Include windfall provisions. Self-attestation.
  - **Ideal** – Align with SNAP, no asset limits.

EARNED INCOME DISREGARDS

- Currently Minnesota uses 4 different earned income disregard approaches for our 4 programs.

Program	Disregard
MFIP	Fluctuates yearly with FPG. Currently at 38%. Will be fixed 50% in 2015
GA	First $50 disregarded
MSA (Follows SSI)	First $65 disregarded, 50% thereafter
GRH	Follow basis of eligibility (GA or SSI)

EARNED INCOME DISREGARDS

State	Earned income disregard
Alabama	20% [1]
Alaska	$90 [2]
Arizona	
All, except JOBSTART	$90 and 30% of remainder
JOBSTART	100% of subsidized wages[3]
Arkansas	20%[4]
California	$90
Colorado	$90 [5]
Connecticut	$90
Delaware	$90 [6]
D.C.	$160
Florida	$90 [7]
Georgia	$90
Hawaii	20%, $200, and 36% of remainder[8]
Idaho	No explicit net income test
Illinois	Varies; difference between 50 percent of the current federal poverty level for the applicant's family size and their TANF payment level
Indiana	$90 [6]
Iowa	20% [9]
Kansas	$90
Kentucky	No explicit net income test
Louisiana	$120
Maine	No explicit net income test
Maryland	20%
Massachusetts	$90
Michigan	No explicit net income test
Minnesota	18% [10]
Mississippi	$90 [11]
Missouri	$90
Montana	$200 and 25% of remainder
Nebraska	No explicit net income test
Nevada	No explicit net income test
New Hampshire	20%
New Jersey	No explicit net income test
New Mexico	No explicit net income test
New York	$90
North Carolina	No explicit net income test
North Dakota	No explicit net income test
Ohio	No disregards allowed
Oklahoma	$240 [12]
Oregon	No explicit net income test
Pennsylvania	$90 [13]
Rhode Island	No explicit net income test
South Carolina	No explicit net income test
South Dakota	No explicit net income test
Tennessee	No explicit net income test
Texas	$120 and 33.3% of remainder[14]
Utah	$100 [15]
Vermont	No explicit net income test
Virginia	
VIEW	No explicit net income test[16]
All, except VIEW	$142 and 20% of remainder[17]
Washington	No explicit net income test
West Virginia	No explicit net income test
Wisconsin	No explicit net income test
Wyoming	No explicit net income test

EARNED INCOME DISREGARDS

- Recommendation Options
  - **Low Cost 1 –** Establish same methodology throughout programs with consideration for cost neutrality. Winners and losers.
  - **Low Cost 2 –** Status Quo
  - **Pragmatic –** Align with SSI. First $65 disregarded, 50% disregard afterwards.
  - **Ideal –** Increase to higher disregard for the first X months of employment. Move to SSI standard afterwards.

EXCLUSIONS

- There are a total of 58 different unearned income disregards/exclusion among our programs. MFIP alone has 48 exclusions named in statute (MN Stat. 256J.21 Subd. 2)

Exclusions	MFIP	GA/MSA/GRH (SSI Basis)
Family foster care payments to children or adults	X	X
Employment training reimbursements under WIA	X	X
Reimbursements for expenses for volunteer service	X	X
Educational assistance	X	X
Loans	X	X
State income tax refunds	X	X
Federal income tax refunds	X	X
Federal earned income credits	X	X
MN Working family credits	X	X
State homeowners/renters credit	X	X
Federal or satate tax rebates	X	X
Funds for reimbursement, replacement or rebate of personal or real property.	X	X
Insurance settlements for medical, funeral, burial, or repair/replace property	X	X
Reimbursements for medical expenses not paid by MA	X	X
Payments by a vocational rehab program administered by the state	X	
In-kind income	X	
Assistance payments to correct underpayments	X	X
Payments for short-term emergency needs	X	X
Funeral and cemetery payments	X	X
Nonrecurring cash gifts of $30 ($60 for GA) or less, per participant per year	X	X (per quarter)
Energy assistance	X	X
SSI, incl. retroactive SSI	X	X
MSA, incl. retroactive	X	X
Proceeds from sale of real or personal property	X	
State adoption assitance payments	X	X
Family subsidy payments for care of children with disabilities	X	
Interest payments/dividends from property not excluded and not exceed asset limits	X	X
Gifts to children with life-threatening illness		X
State annuities for certain veterans		X

Exclusions	MFIP	GA/MSA/GRH (SSI Basis)
Rent rebates	X	X
Income from minor caregiver, minor child through age 6, child in school half-time	X	
Income earned by caregiver under 20 and in school half-time	X	
MFIP child care payments	X	
All othe payments by MFIP that supports economic stability	X	X
Income related to shared living expenses	X	X
Reverse mortgages	X	
Benefits from child nutrition act	X	
Benefits from WIC	X	
Benefits from National School Lunch Act	X	
Relocation assistance for displaced persons	X	X
Benefits from trade act of 1974	X	X
War reparations payments to Japanese Americans and Aleuts	X	X
Payments to veterans as a result of legal settlements to Agent Orange and other chem.	X	X
Income otherwise specifically excluded from MFIP in state or fed. law/regulation	X	X
Security and utility deposits	X	X
American Indian tribal land settlements	X	X
Income of minor parent's parents and stepparents for minor parent grant	X	
Income of minor parent's parent and stepparents 200% FPG for family size not incl. the minor parent's child in household	X	
Payments made to child for relative custody assistance	X	
Vendor payments for goods and services on behalf of client, unless cash option available	X	
Principal portion of contract for deed payments	X	
Cash payments for individuals enrolled in AmeriCorps, VISTA...	X	X
1/3 of child support payments by absent parent		X
Interest earned on burial funds		X
Commercial transportation ticket received as gift not converted to cash		X
Crime victims compensation		X
Hostile fire pay		X

EXCLUSIONS

- Recommendation Options
  - **Low Cost –** Single, exhaustive list of disregards/exclusions for all programs. Maintain full SSI list of exclusions.
  - **Pragmatic 1 –** Create a list of unearned income that would be **included** for counting income (next slide)
  - **Pragmatic 2–** Align with MAGI/Non-MAGI/health care approach upon systems modernization.

INCLUSIONS?

- Recommended list of included income.
  - Investment income
  - Income from property (ongoing, rent, sales)
  - Income from savings
  - Income from trusts (Exclude special needs and supplemental needs)
  - Income from loans
  - Prizes and winnings
  - Child support
  - Gifts exceeding $60 per quarter
  - Unemployment Insurance income
  - Earned income

REPORTING

- There are 33 different reporting standards throughout our programs and 36 for SSI.
- Many similarities between reporting standards but with slight differences, ie: program X must report when:

Receipt of unearned income	Recurring change in unearned income
Non-recurring change of more than $30 in unearned income	Recurring change of more than $50 month of net earned or unearned income
Change of more than $100 month in gross earned income	Change of more than $50 of unearned income, unless related to public assistance

REPORTING

Changes required to be reported

Adult or child starts/terminates job, works more/fewer hours, gets a raise.
Change in employment status
Unit member starts/stops a business
Receipt of unearned income
Recurring change in unearned income
Non-recurring change of more than $30 in unearned income
Recurring change of more than $50 month of net earned or unearned income
Change of more than $100 month in gross earned income
Change of more than $50 of unearned income, unless related to public assistance.
Receipt of lump sum
An increase in assets
Change in citizenship/immigration status
Change in household composition
A pregnancy terminated before birth when there are no other minor children
Change in non-custodial parents address, visitation schedule.
Marriage, legal separation, or divorce
Death of unit member
Change in address/residence
New or change in rent subsidy.
Sale, purchase, or transfer of property
Transfer of property if done to establish or maintain eligibility
Change in school attendance of a parent under 20 or employed child
Change in physical or mental status of a unit member
Filing of lawsuit, worker's comp. or monetary claim against a 3rd. Party
Drug felony conviction
Information affecting a shared household exception
Household moves out of state
Income exceeds 200% of FPG
Shelter expenses
Utility expenses
Decrease in income
Initial employment
Change in legal obligation to pay child support

Reporting

- Recommendation Options
  - **Low Cost** – Create a single list for reporting standards among programs (next slide)
  - **Pragmatic** – Use single list for reporting. Allow for 30 day reinstatements. Use same day reporting for all programs, ie: 8th. Day of the month.
  - **Ideal** – Pragmatic approach, plus: Move to 3 month reporting. Limit overpayment collection to more than $50 month. Require immediate reporting for significant change.

REPORTING

Preliminary recommended uniform list

Change in any income ($50 for pragmatic option)
Change in employment status, hours, wage
Change in household composition
Change in address/residence
Receipt of lump sum payment
Increase in assets
Change in citizenship/immigration status
A pregnancy terminated before birth when there are no other minor children
Change in non-custodial parents address, visitation schedule.
Marriage, legal separation, or divorce
New or change in rent subsidy.
Sale, purchase, transfer of property
Change in school attendance of a parent under 20 or employed child
Change in physical or mental status of a unit member
Filing of lawsuit, worker's comp. or monetary claim against a 3rd. Party
Drug felony conviction
Shelter expenses
Utility expenses
Change in legal obligation to pay child support

Other Items

- Budgeting
  - 48 states use prospective budgeting for their TANF programs.
  - Minnesota uses prospective budgeting with 6 month reporting for SNAP
  - **Recommendation:** Move to prospective budgeting upon systems modernization. Current systems can not cost effectively absorb this recommendation. Complements 3 month reporting recommendation.

Other Items

- Eligibility Methodology
  - Considered using FPG as the basis for initial eligibility basis for all programs.
    - Conflicts with certain SSI waivers.
    - GA could easily adopt a FPG basis of eligibility, however GRH and MSA would have difficulties.

Other Items

- Repeal of the MFIP shared household standard
  - Current policy adds unneeded complexity and case errors.
  - Affects 2% of cases.
- Self-employment income
  - Count 50% of gross self-employment income, or;
  - Use submitted tax returns.
- Uniform temporary absence policy
  - Politically sensitive and potentially controversial
- Separate MFIP cash from SNAP
  - Would aid in the implementation of systems modernization

Recommendation Approach

- Many considerations must be considered:
  - Policy complexity...unintended consequences
  - Systems modernization
- Multi-year approach to achieve greatest uniformity and simplification.
  - 2014 – Pursue policies that will be easiest to implement, with fewest complications while maximizing positive impacts on simplification and clients. Receive legislative authority to pursue future recommendations.
  - 2015 – Pursue policies that need more time to develop as to minimize unintended consequences.
  - Systems modernization – Pursue policies that can only be reasonably be operationalized once systems modernization is implemented.

2014 Recommendations

- Self-attestation for assets and reduce categories to 2, cash/bank accounts and vehicles, $10,000 asset limit.
  - Current policy results in high level of case errors and include over 10 asset categories.
  - Combined manual include 40 chapters on assets alone.
- Align to SSI earned income disregard. First $65 and 50% thereafter.
  - Currently our four programs use 4 different disregard policies.
  - Rewards/incentivizes work.
- Allow for 30 day reinstatements.
- Same reporting date, 8th. day of the month.
- Repeal MFIP shared household standard.
- Simplified self-employment income reporting, incl. SNAP

2014 Recommendations

- Obtain legislative authority to pursue or prepare for systems modernization:
  - Prospective budgeting
  - 3 month reporting
    - Including no retrospective overpayment collection if reporting done in "good faith".

2015 Recommendations

- Single list for what income is included when determining household/client income.
  - Replace current practice of income exclusions. Currently there are 58 different exclusions. 48 exclusions named in statute for MFIP.
  - Included income could be simplified to approx. 10 items
- Single list of reporting standards.
  - State programs have 33 different reporting standards, along with 36 reporting standards for SSI.
  - A uniform list of reporting standards could be reasonably reduced to 19 categories and align with all four state programs.

Future Recommendations

- Healthcare, MAGI/Non-MAGI approach for income determination(s). (systems modernization)
  - Monitor
- Uniform temporary absence policy

Committee Members

External Members	Internal Members
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Jessica Webster – Legal Aide	Lea Glad
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INPUT WELCOME

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IMPACTS ON COUNTIES

Proposal	County	Client
Assets: Allow for self-attestation of assets	High	Medium
Assets: Reduce counting of assets to two categories (cash and vehicles) and increase asset limit (ie: $10,000), allow for self-attestation.	High	High
Assets: No asset limits, similar to SNAP	High	High
Earned Income: Align to SSI standard for all programs. First $65 disregarded then additional earnings disregarded at 50%..	Medium	High
Unearned Income: Singular, uniform, exhaustive list of all items excluded for countable income.	Medium	Low
Unearned Income: Singular, Uniform, condensed list of what income would be countable income.	High	Low

IMPACTS ON COUNTIES

Proposal	County	Client
Reporting: Singular, uniform list of reporting standards for all programs.	Medium	Medium
Reporting: Singular uniform list. Allow for 30-day reinstatements, reporting on 10th. day of the month following changes.	High	High
Budgeting: Transition to prospective budgeting using 3 month reporting.	High	Medium
Budgeting: Limit changes to $50 or more change in income. Limit overpayment collections to $50 or more a month.	High	High
Eligibility Methodology: Use FPG as the common method for determining client eligibility.	Low	High
Other: Repeal the shared household standard for MFIP	Medium	Medium
Other: Single policy for temporary absences.	Medium	Medium