Coalition of California Welfare Rights Organization
Welfare Rights Organizations, Inc.

December 4, 2017

Advocate Response to DSS Options for Replacing the Statewide Fingerprint Imaging System (SFIS)

CCWRO position on DSS Option #1- SUPPORT

Option number one (1) would use the existing MEDS system, that for decades has successfully identified duplicate Medi-Cal, CalFresh and CalWORKs participation. Duplicate issuance of aid is rare in the 21st century, given the technological advances made. MEDS spots duplicate participation of not only the parents, which is all Option #4 will do, but also the children. It would also be less intrusive, cost effective and efficient.

"**Authentication of identity**" is not a legal requirement for CalWORKs. Moreover, KBA relies on precise recall of secret information that is not a strong point of human cognition, especially adults living in deep poverty. This is also especially unreliable when it applies to people new to the U.S. or who are young, as they don't have much public data built up.

CCWRO position on DSS Option #4 – OPPOSE

Option number four (4) creates a new bureaucracy and costs that will exceed $10 million annually when history has shown that there is no need for a new bureaucracy and costs to prevent the issuance of duplicate aid that can better be used to alleviate the homelessness ravaging CalWORKs children.

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SUMMARY

Chapter 24, Statutes of 2017 (SB 89, Committee on Budget and Fiscal Review) provides that the department shall implement and maintain an automated, nonbiometric identity verification method in the CalWORKs program to identity verification and prevent duplicate aid and aids in the efficiency and efficacy of the file clearance process.

There is no mention of "authentication" in SB 89. The federal law for Medi-Cal and CalFresh only requires that identity be verified. CalWORKs has no federal verification requirements. Moreover, there is nothing in Chapter 24, Statutes of 2017 (SB 89, Committee on Budget and Fiscal Review) that requires "authentication of identity" as a new condition of eligibility for CalWORKs.

The following four (4) options were discusses during the single consultation meeting with DSS:

1. Continue with the existing verification process used for CalFresh and Medi-Cal;

2. Make Knowledge Based Authentication (KBA) a requirement for all applicants;

3. Make KBA a requirement only for applicants applying remotely (by phone or online); and

4. Hybrid of Options 1 and 3 along with an Application Hub for prompt electronic verifications.

NO FISCAL ANALYSIS - Some of the stakeholders requested a fiscal estimate for each option. The Department report failed to include any fiscal impact analysis of the four (4) recommendations that the Department put forth in their report to the Legislature.

TIMELINE OF IMPLEMENTATION - During one of the stakeholder meeting on July 19,2017, DSS representative assured the workgroup that DSS would be reporting to the fiscal committees of each house before going ahead with implementation of the alternative to SFIS. This meant that DSS would not be taking definitive steps to implement Option #4 without presentations to the Legislative Assembly Budget Sub #1 and Senate Budget Sub #3.

It was disappointing to see the proposed implementation plan for KBA that would do a Request for Proposal (RFP) November of 2017. The RFP has not been shared with advocate stakeholders.

The DSS November 2017 report states: "The schedule below shows the major milestones related to the implementation of Option 4, Remote KBA in combination with an Application Hub. Any necessary funding will be sought through the annual budget process.

DSS Intended Remote KBA Timeline

- November 2017—Request for Proposal (RFP) and scope of work development
- November/December 2017—Risk code refinement and stakeholder input
- December 2017—RFP published
- February 2018—Evaluate vendor proposals and award contract
- April 2018—Execute KBA service contract
- April 2018—Develop business process and procedure for remote KBA service
- May 2018 – Implementation instructions ACL following stakeholder review
- Summer 2018—Remote KBA service available for counties opting out of face-to-face interviews"

The CalWORKs consumer representatives recommend **Option #1**, the most cost-effective option that saves over $10 million annually. Option #1 will provide nonbiometric identity verification methods in the CalWORKs program to identity verification and prevent duplicate aid and aids in the efficiency and efficacy of the file clearance process for all assistance unit members, including children. Options #'s 2,3, and 4 only address adults.

History of SFIS in California

The history of statewide finger imaging system (SFIS): The SFIS system was enacted in 1996 added by a 1996 trailer budget bill SB 1780 (Stats. 1996, Ch. 206, Sec. 1.5.) to allegedly identify and prevent duplicate participation in the CalWORKs and Food Stamp program (now CalFresh).

On average, SFIS detects about 65 cases of potential duplicate aid fraud each year (about 0.01percent of all applications). Assuming that such duplicate aid would not have been detected by any other means, the benefit loss associated with these 65 cases could be up to $400,000 per year based upon the average benefit and duration of a CalWORKs case.

SFIS is wasteful: In 2003, the Bureau of State Auditor General released a report about SFIS which concluded "…most of the matches that SFIS identified have turned out to be administrative errors made by county staff, and the level of detected duplicate-aid fraud has been small." After this revelation of waste, California's welfare system still continues to spend taxpayer money to demonstrate that California is concerned about program integrity. To date, California may have spent about $200 million on this failed system.

SFIS eliminated for CalFresh: On October 6, 2011, Governor Jerry Brown signed AB 6, Chapter 501, Statutes of 2011, which eliminated the Statewide Finger-Imaging System (SFIS). Effective January 1, 2012 California stopped using SFIS to identify duplicate participation in the CalFresh program and started to use the Medical Eligibility Data System (MEDS) to make sure that an applicant for CalFresh was not receiving CalFresh in another county.

In the past five years MEDS addressed CalFresh duplicate participation: Neither the State Auditor General's office or any other entity have found widespread duplicated participation in CalFresh. MEDS has been very effective in combating duplicate participation.

MEDS has been the system addressing potential duplicate Medi-Cal participation: Since 1983, way before the enactment of SFIS, MEDS has served as the system that provides automated, nonbiometric identity verification method in the Medi-Cal program to identity verification and prevent duplicate aid and aids in the efficiency and efficacy of the file clearance process for all Medi-Cal recipients.

KBA was not designed for our CalWORKs Caseload: The main weakness of knowledge-based authentication is that it relies on **precise recall** of the secret information. If the user makes a small error in entering the secret, the authentication

fails. Unfortunately, precise recall is not a strong point of human cognition. Studies have shown that people are much better at imprecise recall, particularly in **recognition** of previously experienced stimuli. Much of the information that KBA asks for can be found on a number of social networks, such as what city was your mother born in? KBA is especially unreliable when it applies to people new to the U.S. or who are young, as they don't have much public data built up.

Given the demographics of our caseload, we believe this would have a horrific impact on our child-only cases which are 29% of the CalWORKs caseload and about 20% of the applications. One could imagine the questions (on column 2) being asked of the ineligible relative caretaker of the child-only caseload.

Appendix #2 is a list of questions KBA would ask CalWORKs applicants that are designed for whole different demographic of our population and would certainly be demeaning and frustrating for parents trying to raise children in deep poverty .

Analysis of DSS and Advocate Recommended Options

OPTION #1 RECOMMENDED BY ADVOCATES - Continue with the existing verification process used for CalFresh. Utilize the existing Applicant IEVS process for identity verification. The information provided by the client would be matched against MEDS. This process validates a client's identity, but does not authenticate the identity. CDSS would issue guidance to counties reminding them of the need to verify documents of all applicants.

PROS

• Verifies identity of all assistance members, including children;

• Detects duplicate aid, including children, which KBA does not;

• It has been used successfully for the Medi-Cal program since 1983;

• It has been used successfully for the CalFesh program since 2011;

• It is efficient in that it would save taxpayers about an estimated $15 million annually.

CONS: (DSS Cons)

DSS Cons	Advocate Response to DSS Con
Does not authenticate identity	Authentication of identity is not a legal requirement for CalWORKS. Moreover, KBA relies on precise recall of secret information that is not a strong point of human cognition, especially adults living in deep poverty. This is also especially unreliable when it applies to people new to the U.S. or who are young, as they don't have much public data built up.
Does not facilitate remote applications	MEDS has facilitated remote applications for Medi-Cal for several decades with evidence of increased fraud. This has also been true for CalFresh for several years. It can do the same for CalWORKs.
Will not enable same-day eligibility determination	MEDS has facilitated remote applications for Medi-Cal for several decades. This is also true for CalFresh. It can do the same for CalWORKs.

Will not reduce the risk of overpayments and recoupments	DSS has no objective study to prove this claim

OPTION #4 RECOMMENDE BY DSS - Option # 4, that is a Hybrid of Options #1 and #3 along with an Application Hub for prompt electronic verifications. A hybrid of Options #1 and #3, while developing an Application Hub for expedited eligibility determination and identity verification. In the short-term, CDSS would implement Option #1 as outlined above, and counties offering remote applications under Senate Bill 947 (Chapter 798, Statutes of 2016) would utilize KBA once that service is competitively procured. All counties would allow clients the opportunity for in-person application, and that process would not require KBA. In the long-term, CDSS would work with stakeholders to develop an Application Hub for real-time eligibility determination for CalWORKs and CalFresh, ensuring benefits are issued on time and with significantly fewer errors. The Application Hub would ping state and federal sources, such the Franchise Tax Board and the Employment Development Department, to verify information so that clients can more easily complete their applications. More accurate benefit determination will reduce client burdens from collections/grant reductions. Development of the Application Hub was the top priority identified by county, advocate and other stakeholders for the $13 million in CalFresh bonus funds awarded to the state in 2015-16.

DSS Pros:

DSS Pro	Advocate Response to DSS Stated "Pro"
Maximizes client choice for the application process	Remote applications have been done for CalFresh for several years without any increase in the State's error rate. Counties have the discretion to accommodate CalWORKs families, many of whom are homeless, or erect barriers on their path to get relief from California's safety net program for impoverished families of California-many of them homeless. This is a county choice and there is no evidence that KBA would lead to all counties opting for the SB 947 option.
Verifies identity	MEDS also verified identity. It has been verifying identity for decades
Authenticates identity	Authentication of identity is not a legal requirement for CalWORKS. It is not required by SB 89. Moreover, KBA relies on precise recall of secret information that is not a strong point of human cognition, especially adults living in deep poverty. This is also especially unreliable when it applies to people new to the U.S. or who are young, as they don't have much public data built up.

Detects duplicate aid	MEDS detects duplicate participation for all assistance unit members in CalWORKs, CalFresh and Medi-Cal, whereas this option only applies to adults and not children.
Facilitates remote applications	MEDS has facilitated remote applications for Medi-Cal for several decades with evidence of increased fraud. It can do the same for CalWORKs.
Enables same-day eligibility determination	MEDS has facilitated remote applications for Medi-Cal for several decades. This is also true for CalFresh. It can do the same for CalWORKs.
Reduces the risk of overpayments and recoupments	DSS has no objective study to prove this claim.
Some clients find the questions to be intrusive or difficult to answer	The main weakness of knowledge-based authentication is that it relies on **precise recall** of the secret information. If the user makes a small error in entering the secret, the authentication fails. Unfortunately, precise recall is not a strong point of human cognition. Studies have shown that people are much better at imprecise recall, particularly in **recognition** of previously experienced stimuli. Lot of the information that KBA asks can be found on a number of social networks, such as what city was your mother born in? KBA is especially unreliable when it applies to people new to the U.S. or who are young, as they don't have much public data built up. Given the demographics of our caseload, we believe that this would have a horrific impact on our child-only cases which are 29% of the CalWORKs caseload. One could imagine the questions (on column 2) being asked of the ineligible relative caretaker of the child-only caseload.

CONCLUSION

What a KBA-like system proposes to do, MEDS has been doing for the CalFresh program for the past five years without spending $13.2 million a year, and for Medi-Cal since 1983.

We suggest that in the absence of any major duplicate participation in the CalFresh program after 5 years of no fingerprinting, it is time to treat CalWORKs families just like we treat CalFresh and Medi-Cal families in California. There is no evidence of a slew of duplicate CalFresh and Medi-Cal participation. Moreover, it is our view that MEDS is more than capable of identifying duplicate participation as it is an instrument to verify identity of non-citizens for Medi-Cal. Moreover, while KBA only identifies duplicate participation of adults, MEDS captures not only adults, but children too.

Advocates suggest that the Legislature adopt Option #1 which has a proven track record of combating any alleged duplicate participation for adults, but also for children. This option is also the most effective option of the four (4) options of the October 2017 DSS report.

The $13.2 million that is planned to be wasted for SFIS or a similar system in the Governor's 2018-2019 proposed budget, can better be used to help CalWORKs homeless families by upgrading the Homeless Assistance Program.

APPENDIX 1

10831. (a) The department shall implement and maintain an automated, nonbiometric identity verification method in the CalWORKs program. It is the intent of the Legislature to codify additional details regarding this method so that recipients of aid, other than dependent children, will be required, as a condition of eligibility, to cooperate with this method.
(b) The department shall update the Legislature, no later than November 1, 2017, regarding options for the design, implementation, and maintenance of an automated, nonbiometric identity verification method in the CalWORKs program.
(c) The options developed under this section shall be for use in California counties and shall include procedures and a schedule for implementation.
(d) Prior to the update to the Legislature, the department shall do both of the following:
(1) Consult with stakeholders, including legislative staff, representatives of counties and county human services agencies, current or former CalWORKs clients, advocates for clients, and other stakeholders, as appropriate.
(2) Consider how any new methods of identity verification would impact applicant or recipient experiences and make application and eligibility practices more efficient.
(e) (1) A method implemented and maintained pursuant to this section shall be reviewed annually, with an update to the Legislature in the course of the annual spring budget subcommittee process, according to the following criteria:
(A) The extent to which the method improved identity verification and prevented duplicate aid.
(B) The extent to which the method improved the client experience.
(C) The extent to which the method aided in the efficiency and efficacy of the file clearance process.
(2) A method implemented and maintained pursuant to this section shall be evaluated, and a written report shall be submitted to the appropriate fiscal and policy committees of the
Legislature, addressing the criteria in paragraph (1) by April 1, 2019.
(f) Notwithstanding any other law, contracts necessary pursuant to this section shall be exempt from both of the following:
(1) The personal services contracting requirements of Article 4 (commencing with Section 19130) of Chapter 5 of Part 2 of Division 5 of Title 2 of the Government Code.
(2) The Public Contract Code and the State Contracting Manual. Contracts necessary pursuant to this section shall not be subject to the approval of the Department of General Services.
(g) Beginning in fiscal year 2018-19, any method implemented and maintained pursuant to this
section shall only be operative in years in which funding is provided in the annual Budget Act for this purpose.

APPENDIX 2

Examples of questions Pondera would ask to determine identity of CalWORKs & CalFresh applicants and recipients. *(These questions assume alternative facts)*

The current industry standard is to present 4 questions, 3 of the 4 questions answered correctly will pass the authentication. If not, then the person would be suspected of welfare fraud and could be subject to investigation, a search of their house by the welfare fraud investigators and more. Our beneficiary concerns are shown below:

KBA Question	BENEFICIARY CONCERN
1. What month were you born?	There are many immigrants who have no idea what month they were born.
How long have you lived at your current residence?	There are many are homeless CalWORKs families that do not have a fixed residence address.
Which of the following people have you known?	This sounds like McCarthyism for our Hispanic brothers and sisters.
Which of the following vehicles have you recently owned or leased?	Less than 25% of CalWORKs families own a car. This question is demeaning in that it assumes the respondent has a car like the person drafting the questions does.
Which of the following streets have you ever lived or used as your address?	There are many are homeless CalWORKs families that do not have a fixed residence address.
What is the color of your current vehicle?	Less than 25% of CalWORKs families own a car. This question is demeaning in that it assumes the respondent has a car like the person drafting the questions does.
Which of the following email addresses have you ever been associated with?	Many CalWORKs parents, especially those from the 29% child-only cases have no email address. It is also an insulting question and the respondent would feel demeaned for not having an email address.
According to your driver's license, approximately how tall are you?	Less than 25% of CalWORKs families own a car. This is a demeaning question in that it assumes that the respondent has a car like the person drafting these questions does. Moreover, many parents do not even have a driver's license.
Which of the following phone numbers have you ever been associated with?	This question implies that folks have the same phone numbers for years and can identify the number. In reality, many CalWORKs beneficiaries are having their telephone services constantly disconnected then getting different numbers.

Summary of Options for Replacing the Statewide Fingerprint Imaging System

October 2017

Director Will Lightbourne
Deputy Director Todd Bland

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Executive Summary

Chapter 24, Statutes of 2017 (SB 89, Committee on Budget and Fiscal Review) requires the California Department of Social Services (CDSS) to implement and maintain an automated, non-biometric identity verification method in the California Work Opportunity and Responsibility to Kids (CalWORKs) program to replace the Statewide Fingerprint Imaging System (SFIS). Chapter 24 repeals SFIS no later than July 1, 2018. After consulting with stakeholders, Chapter 24 requires CDSS to submit a report outlining options for SFIS replacement no later than November 1, 2017.

Pursuant to Chapter 24, CDSS held two stakeholder meetings to obtain input on potential alternatives for SFIS replacement. In addition, at these stakeholder meetings, CDSS reviewed the results of a pilot that used Knowledge Based Authentication (KBA) to verify identity. CDSS noted all comments and concerns from the stakeholder consultations and considered them while drafting this Legislative Report. Building on prior research that begun in 2015 and the recently completed verification pilot, discussed later, four options were developed for replacing SFIS:

1. Continuing with the existing verification process used for CalFresh.
2. Making KBA a requirement for all applicants.
3. Making KBA a requirement only for applicants applying remotely (by phone or online).
4. Hybrid of Options 1 and 3 along with an Application Hub for prompt electronic verifications.

CDSS recommends Option 4, moving forward with the KBA method for remote applications only with the long term vision of an Application Hub. The KBA implementation would start with phone interviews at first and eventually include online applications. During this time, CDSS will be working towards the creation of an Application Hub, supporting real-time eligibility determination for CalWORKs and CalFresh, and ensuring benefits are issued on time and with significantly fewer errors.

Options for Replacing the Statewide Fingerprint Imaging System

I. Introduction and Legislative Mandate

For much of this decade, the policy of requiring applicants of CalWORKs to be fingerprinted as a condition of eligibility has been questioned by the Legislature, advocates, the Bureau of State Audits and the California Department of Social Services (CDSS). Accordingly, Chapter 24, Statutes of 2017 (SB 89, Committee on Budget and Fiscal Review), repeals the fingerprinting requirement no later than July 1, 2018, and requires CDSS to implement a non-biometric identity verification method for CalWORKs. Chapter 24 further requires that CDSS update the Legislature no later than November 1, 2017 on "options for the design, implementation, and maintenance" of the new method. The options are to include "procedures and a schedule" for implementation. Prior to this update, CDSS must consult with specified stakeholders. This paper is submitted pursuant to Section 16 of Chapter 24, excerpted below:

SEC. 16.
Section 10831 is added to the Welfare and Institutions Code, to read:

10831. (a) The department shall implement and maintain an automated, nonbiometric identity verification method in the CalWORKs program. It is the intent of the Legislature to codify additional details regarding this method so that recipients of aid, other than dependent children, will be required, as a condition of eligibility, to cooperate with this method.

(b) The department shall update the Legislature, no later than November 1, 2017, regarding options for the design, implementation, and maintenance of an automated, nonbiometric identity verification method in the CalWORKs program.

(c) The options developed under this section shall be for use in California counties and shall include procedures and a schedule for implementation.

(d) Prior to the update to the Legislature, the department shall do both of the following:

(1) Consult with stakeholders, including legislative staff, representatives of counties and county human services agencies, current or former CalWORKs clients, advocates for clients, and other stakeholders, as appropriate.

(2) Consider how any new methods of identity verification would impact applicant or recipient experiences and make application and eligibility practices more efficient.

II. Background and Reference Documents

CalWORKs Application Process

CalWORKs provides cash assistance and services to low-income families with children. The current CalWORKs application process requires applicants to come into the county office for an in-person interview and go through the SFIS process. The county worker will request an Applicant Income and Eligibility Verification System (IEVS) abstract through MEDS. The county worker will process the Applicant IEVS information and any

documentation provided by the client to determine eligibility. The county will notify the client with a notice of action of the client's approval or denial or pended application. If approved, the notice will provide the client with their benefit amount. If the application is pended, the notice will tell the client when the county will review their eligibility again (when they appear they may be eligible). If denied, the notice will state the reason for the denial.

Applicant Income and Eligibility Verification System (IEVS)

This federally mandated matching system consists of a coordinated data exchange comprised of various cross-matches of applicant name and Social Security Number (SSN) with various databases. These matches include, but are not limited to, Employment Development Department (EDD) Wage and Unemployment/Disability payments, and Social Security and Supplemental Security Income verification. The Applicant IEVS verifies matches that take place at the time of application for public assistance. These matches occur over several days, and confirm income eligibility, assets, citizenship and residency.

Statewide Fingerprint Imaging System (SFIS)

Chapter 206, Statutes of 1996 (SB 1780, Committee on Budget and Fiscal Review) required CDSS to create SFIS in order to detect and prevent the issuance of duplicate aid in CalWORKs and CalFresh. SFIS thereafter was implemented, and is a biometric ID verification system that takes images of applicants' index fingerprints and a photo of the benefit applicant. In 2011, use of SFIS was ended for CalFresh by enactment of Chapter 501, Statutes of 2011 (AB 6, Fuentes).

The SFIS process requires the applicant to be physically present in a county welfare office in order to obtain the fingerprint images and photograph. Because clients are aware of SFIS, there may be deterrent effects to applying for duplicate aid, which cannot be estimated or documented. The results of the fingerprint imaging matching process are used solely to determine whether additional investigation or documentation is required before proceeding with the applicant's case.

On average, SFIS detects about 65 cases of potential duplicate aid fraud each year (about 0.01 percent of all applications). Assuming that such duplicate aid would not have been detected by any other means, the benefit loss associated with these 65 cases could be up to $400,000 per year based upon the average benefit and duration of a CalWORKs case.

Appendix A provides additional background on the CalWORKs eligibility process and SFIS.

Earlier Exploration of an SFIS Replacement

In a 2009 report (2009-101[1]) and related follow up reports, the California State Auditor questioned the cost effectiveness and value of SFIS. Based on this report and the mounting evidence that SFIS costs outweigh its benefits, in May 2015 the CDSS and the Office of Systems Integration (OSI) developed a Request For Information (RFI) to solicit potential less invasive alternatives to SFIS. Seven vendors responded to the RFI. Each of the seven vendors proposed a solution, all of which were based on the KBA method.

The RFI process concluded that the most viable solutions presented for replacing SFIS and deterring and detecting duplicate aid fraud were based on KBA. KBA is the industry standard used for identity proofing, in lieu of using biometric technologies. At its core, KBA is a method of authentication which seeks to prove the identity of an applicant accessing a service – in this case, applying for cash assistance – by requiring the applicant to correctly identify personal information specific to the applicant.

The KBA provides both identity verification and authentication. The software performs identity verification to determine if the identity provided to the program is legitimate (for example, a real SSN, if one is provided, and birthdate, are both tied to the name provided). While identity verification is designed to verify that the identity provided to the program is legitimate, identity authentication then seeks to ensure that the applicant is in fact the individual that they are representing themselves to be. To authenticate an individual, the KBA presents a quiz.

The authentication quiz consists of four multiple choice questions that are designed to be easy for the individual to answer. Questions generally fall into one of the following categories:

- Address and phone history (such as the street you live on)
- Asset history (such as the color of your car)
- Educational History
- Driver's License/ID card data

Identity Verification Pilot

In late 2016, CDSS selected Pondera Solutions, through the Software Licensing Program (SLP), as the vendor to conduct a pilot using the KBA method. The pilot commenced in February in Placer County, and expanded to offices in five additional counties (Los Angeles, Ventura, Riverside, Napa, and Stanislaus) at the end of March 2017. Two of the pilot counties (Los Angeles and Placer) also used this service for their county General Relief/General Assistance programs. The duration of the pilot was approximately three months. The counties were provided in-person training and ongoing monitoring of the service in each of the participating offices.

The goals of the pilot were to: (1) authenticate identity and prevent duplicate aid through the most client-sensitive means that maintains program integrity, (2) allow counties to

[1] California State Auditor – November 2009 Report 2009-101 - *Department of Social Services: For the CalWORKs and Food Stamp Programs, It Lacks Assessments of Cost-Effectiveness and Misses Opportunities to Improve Counties Antifraud Efforts.*

improve intake business processes, and (3) assess potential benefits to clients and their perception of KBA.

The pilot ran parallel to the current-law SFIS requirements. Counties were not allowed to make any case decisions, fraud referrals or conduct investigations based on the KBA results. The KBA service results during the pilot were put into a research queue for future discussion with counties about what the results mean and how they could be resolved.

Appendix B presents the evaluation of the pilot. Overall, the pilot demonstrated that KBA protected program integrity just as well as the combination of SFIS and IEVS today. The service was preferred by clients, and county staff generally found the process easier to learn and use than the current SFIS and IEVS processes.

Additionally, it was noted that the adoption of the KBA solution would support the elimination of the requirement for face to face interviews in the CalWORKs program pursuant to Chapter 798, Statutes of 2016 (SB 947, Pan), by enabling verification over the phone or online. Pending further analysis, it also could facilitate potential reductions in the amount of documentation applicants must provide for eligibility determination.

III. Stakeholder Process

In accordance with Chapter 24, CDSS hosted two consultations with stakeholders, including legislative staff, welfare and immigration Advocates, current CalWORKs participants, California Welfare Fraud Investigators Association (CWFIA), County Welfare Director's Association (CWDA), and county representatives (Pilot and Non-Pilot).

The July 19, 2017 agenda items revolved around possible options for an automated, non-biometric identity verification method in the CalWORKs program. CDSS presented the CalWORKs application process, SFIS overview, process used to identify potential SFIS replacement services and the Identity Verification Pilot results. During the open discussion participants requested follow up information to be shared at the next consultation. These included:

- List of Pilot Office Locations
- CalFresh Application Process
- Overview of Applicant IEVS
- Pilot Demographic Data
- Historical SFIS Data

The September 26, 2017 agenda included a presentation of the CalFresh Application Process provided by Placer County, CalHEERS overview of its Remote Identity Proofing (KBA) process, Pilot Office Location and Demographic Data, and Historical SFIS Data. The primary focus of this consultation was an open discussion of the SFIS Replacement Options identified by CDSS.

These options are:

1. Continuing with the existing verification process used for CalFresh.
2. Making KBA a requirement for all applicants.

3. Making KBA a requirement only for applicants applying remotely (by phone or online).
4. Hybrid of Options 1 and 3 along with an Application Hub for prompt electronic verifications.

A wide variety of opinions were expressed regarding the options. In summary, we noted:

- Concern that KBA was the only alternative service to SFIS;
- Recognition that "authentication" supports program integrity but is not required by statute;
- Concern that KBA is more difficult for some applicants, particularly for minorities;
- Comments in support of a KBA service for preventing fraudulent applications;
- Consensus that KBA is less intrusive to clients than SFIS; and
- Comments from a current CalWORKs client in support of client choice (specifically, options 3 and 4).

IV. The Options

The narrative below summarizes the options and their respective pros and cons. Additionally, these options are subject to the budget and information technology approval processes.

Option 1: Continuing with the existing verification process used for CalFresh.

Utilize the existing Applicant IEVS process for identity verification. The information provided by the client would be matched against MEDS. This process validates a client's identity, but does not authenticate the identity. CDSS would issue guidance to counties reminding them of the need to verify documents of all applicants.

Pros:

- No additional service required
- Verifies identity
- Detects duplicate aid
- County staff and clients are familiar with the process

Cons:

- Does not authenticate identity
- Does not facilitate remote applications
- Will not enable same-day eligibility determination
- Will not reduce the risk of overpayments and recoupments

Option 2: Making KBA a requirement for all applicants.

Utilize the Knowledge Based Authentication method statewide for all in-person and remote applications.

Pros:

- Verifies identity
- Authenticates identity
- Detects duplicate aid
- Facilitates remote applications

Cons:

- Will not enable same-day eligibility determination
- Will not reduce the risk of overpayments and recoupments
- Some clients find the questions to be intrusive or difficult to answer

Option 3: Making KBA a requirement only for applicants applying remotely.

Utilize the Knowledge Based Authentication method for remote applications only. CDSS would issue guidance to counties reminding them of the need to verify documents of clients applying in-person.

Pros:

- Maximizes client choice for the application process
- Verifies identity
- Authenticates identity
- Detects duplicate aid
- Facilitates remote applications

Cons:

- Will not enable same-day eligibility determination
- Will not reduce the risk of overpayments and recoupments
- Some clients find the questions to be intrusive or difficult to answer

Option 4: Hybrid of Options 1 and 3 along with an Application Hub for prompt electronic verifications.

A hybrid of Options 1 and 3, while developing an Application Hub for expedited eligibility determination and identity verification. In the short-term, CDSS would implement Option 1 as outlined above, and counties offering remote applications under Senate Bill 947 (Chapter 798, Statutes of 2016) would utilize KBA once that service is competitively procured. All counties would allow clients the opportunity for in-person application, and that process would not require KBA. In the long-term, CDSS would work with stakeholders to develop an Application Hub for real-time eligibility determination for CalWORKs and CalFresh, ensuring benefits are issued on time and with significantly fewer errors. The Application Hub would ping state and federal sources, such the Franchise Tax Board and the Employment Development Department, to verify information so that clients can more easily complete their applications. More accurate benefit determination will reduce client burdens from collections/grant reductions. Development of the Application Hub was the top priority identified by county, advocate and other stakeholders for the $13 million in CalFresh bonus funds awarded to the state in 2015-16.

Pros:

- Maximizes client choice for the application process
- Verifies identity
- Authenticates identity
- Detects duplicate aid
- Facilitates remote applications
- Enables same-day eligibility determination
- Reduces the risk of overpayments and recoupments

Cons:

- Some clients find the questions to be intrusive or difficult to answer

V. Recommendation

CDSS recommends Option 4, moving forward with the KBA method for remote applications only with the long term vision of an Application Hub. The KBA implementation would start with phone interviews at first and eventually include online applications. During this time, CDSS will be working towards the creation of an Application Hub. Once created, CDSS will pair the remote KBA with the Application Hub. CDSS will develop a budget and implementation plans; a high level implementation plan is presented below.

VI. High Level Implementation Plan

The schedule below shows the major milestones related to the implementation of Option 4, Remote KBA in combination with an Application Hub. Any necessary funding will be sought through the annual budget process. .

Intended Remote KBA Timeline

- November 2017—Request for Proposal (RFP) and scope of work development
- November/December 2017—Risk code refinement and stakeholder input
- December 2017—RFP published
- February 2018—Evaluate vendor proposals and award contract
- April 2018—Execute KBA service contract
- April 2018—Develop business process and procedure for remote KBA service
- May 2018 – Implementation instructions ACL following stakeholder review
- Summer 2018—Remote KBA service available for counties opting out of face-to-face interviews

Intended Application Hub Timeline

- Fall 2017—Issue RFA for consultant to plan and scope for an Application Hub
- Spring 2017/18—Stakeholder discussions regarding an Application Hub
- Summer 2018—Recommendations issued regarding an Application Hub

VII. Additional Considerations

There are a number of factors that need to be considered during implementation. These include:

A) Developing for counties business process instructions, worker training curriculum, and scripts to explain the process to clients

B) Most KBA solutions return risk codes based upon the publicly available information being searched and relied upon for verifications. The question of whether to use, modify, or eliminate the risk codes as part of the KBA system needs further attention and consideration. The SFIS replacement pilot project identified five risk codes which may be of particular value when provided in real time to the eligibility worker. These are:
    - The KBA service was unable to verify the applicant's SSN
    - The input SSN was issued prior to the input date of birth
    - The identity is reported as deceased
    - Address mismatch between the city, state and/or zip code
    - The applicant may reside in a different state

    However, these risk codes usually require further research to resolve, and may not accelerate eligibility determination nor the client experience. CDSS will obtain stakeholder input before incorporating any of these risk codes into the plans for Option 4.

C) Translations into client languages would need to be made and tested. KBA questions are intended to be easy to answer, yet simple questions can be translated with a variety of words, dialects, or conventions that can be imprecise and impede understanding and the best results.

D) Information technology infrastructure for connections and work with clients will depend upon the results of a competitive procurement for the short-term KBA service and longer-term Application Hub.

E) Successful implementation of any solution will depend upon all parties understanding what is being done, when, why, and how.

APPENDIX A

Background Information on the California Work Opportunity and Responsibility (CalWORKs) program and the Statewide Fingerprint Imaging System (SFIS)

I. CalWORKs Eligibility

There are three components to eligibility determination in CalWORKs, following receipt of a paper application:

- **Face to Face Interview** with the applicant--During the interview, the Eligibility Worker will validate the applicant's active aid status, and will verify the applicant's identity through identity verification documentation. The Eligibility Worker will also look for and identify any anomalies in the applicant's information. If a discrepancy cannot be resolved by the applicant, the Eligibility Worker may make an Early Fraud Referral to the Special Investigation Unit (SIU) at the county, for investigation while the intake process continues.

- **SFIS**--The applicant leaves the intake interview and goes to the designated SFIS location within the county office to complete SFIS. The SFIS operator enters the CIN provided by the Eligibility Worker, and scans the fingerprint and takes a photograph of the individual. SFIS then generates either an "expected result" which indicates that the individual is not associated with a different CIN, or an "unexpected result" which indicates the fingerprint matches a different CIN, or does not match the CIN being used. The unexpected results need to be reviewed and investigated to ensure that the result generated is not due to duplicate aid.

- **Applicant IEVS query**--This federally mandated matching system consists of a coordinated data exchange comprised of various cross-matches of applicant name and Social Security Number (SSN) with various databases. These matches include, but are not limited to, EDD Wage and Unemployment/Disability payments, and Social Security and SSI income verification. Applicant IEVS also includes a search for any previous aid in California through MEDS. If previous aid is not found, the county proceeds with establishing a new Client Identification Number (CIN) in the system.

II. Origin of SFIS

In the 1990s some California counties implemented fingerprinting in order to prevent recipients of county General Assistance from obtaining benefits from multiple locations or counties. Los Angeles County expanded these efforts to include Food Stamps (now CalFresh) and AFDC (now CalWORKs) in a system known as AFFIRM. Enacted during the Wilson Administration and modeled on AFFIRM, Chapter 206, Statutes of 1996 (SB 1780) required CDSS to create a statewide fingerprint imaging system (SFIS) in order to detect and prevent the issuance of duplicate in aid in CalWORKs and CalFresh. SFIS thereafter was implemented, and is a biometric ID verification system that takes images of applicants' index fingerprints and a photo of the benefit applicant. In 2011, use of SFIS was ended for CalFresh by enactment of Chapter 501, Statutes of 2011 (AB 6, Fuentes).

III. What SFIS Does

SFIS merely compares fingerprint images to the images of other previous applicants. It is NOT a criminal background check mechanism, as fingerprinting often is commonly used for. Also, as a stand-alone system, SFIS does not share its data with any other system. By law, its data is not available to law enforcement except for purposes of investigations within the program(s) it serves.

The SFIS process requires the applicant to be physically present in a county welfare office in order to obtain the fingerprint images and photograph. Because clients are aware of SFIS, there may be deterrent effects to people applying for aid, which cannot be estimated or documented. The results of the fingerprint imaging matching process are used solely to determine whether additional investigation or documentation is required before proceeding with the applicant's case.

On average, SFIS detects about 65 cases of potential duplicate aid fraud each year (about 0.01 percent of all applications). Assuming that such duplicate aid would not have been detected by any other means, the benefit loss associated with these cases could be up to $400,000 per year based upon the average benefit and duration of a CalWORKs case. (Note that this benefit is far less than the operating costs of SFIS.)

IV. Budget

SFIS has an annual budget $12.3 million ($10.8 million TANF and $1.5 million County). This amount covers vendor costs and state operations at the Office of Systems Integration (OSI). This does not include the county administrative costs for fingerprinting, which are within the CalWORKs Single Allocation to counties. Estimated SFIS decommissioning costs are $2.4 million for a six month phase out of the system. This primarily includes the removal of hardware and ensuring data security.

V. Concerns with SFIS

- The current fingerprinting process is considered by many to be stigmatizing for applicants.
- The application process is cumbersome, requiring significant documentation to be provided by the client and scanned by the county workers.
- SFIS requires applicants to be in the office when applying for aid, and requires a second step in addition to the intake interview. Currently, applicants complete their intake interview and generally must wait in the reception area or schedule a second office visit to complete SFIS.
- Although Applicant IEVS queries MEDS to see if aid already is being received, it cannot authenticate identity. (It cannot validate that the applicant is the person that the applicant says he/she is.)

APPENDIX B

Evaluation of the Statewide Fingerprint Imaging System (SFIS) Replacement Pilot

I. Overview

For much of this decade, the policy of requiring applicants of CalWORKs to be fingerprinted as a condition of eligibility has been questioned by the Legislature, advocates, the Bureau of State Audits and the California Department of Social Services (CDSS). Over the past year, CDSS has conducted a pilot of an alternative identity verification method for CalWORKs applicants in six counties. The alternative method, known as knowledge based authentication (KBA), searches public data bases to create a four question quiz that only the applicant should be able to answer.

Chapter 24, Statutes of 2017 (SB 89, Committee on Budget and Fiscal Review), repeals SFIS no later than June 30, 2018, and requires CDSS to implement a non-biometric identity verification method for CalWORKs. Chapter 24 further requires that CDSS update the Legislature no later than November 1, 2017 on "options for the design, implementation, and maintenance" of the new method. The options are to include "procedures and a schedule" for implementation. Prior to this update, CDSS must consult with specified stakeholders. The purpose of this paper is to provide background information for stakeholders.

The remainder of this white paper is organized as follows:

1. Exploration of an SFIS Replacement
2. The Structure of the KBA pilot (page 2)
3. Pilot Results (page 3)

II. Exploration of an SFIS Replacement

In July 2015, CDSS and OSI issued a Request for Information (RFI) for potential solutions to deter and detect duplicate aid fraud. All vendors made presentations proposing a Knowledge Based Authentication (KBA) service as a potential solution. CDSS did not solicit a biometric solution. KBA is an increasingly common method for accurately verifying an individual's identity, and is used across government, E-commerce, financial, healthcare, insurance and other industries. To authenticate identity, a KBA quiz is generated instantly and draws from a uniquely configured "Question Bank". The multiple choice questions typically relate to address history, assets owned, educational history, known associates, and demographic information. Typical questions displayed by The KBA Service include "Which of the following addresses have you ever been associated with?" and "Which of the following vehicles have you ever owned or leased?" Currently, recipients of Covered California's health benefits may access their benefit information online through a remote identity determination process by answering a KBA quiz.

What is KBA?

The KBA service is a two-step search and verification workflow. Users access the Search Dashboard by entering the applicant's name, address, SSN, and date of birth to search for any MEDS data that matches this applicant-supplied information. After performing this first level search, the second step in the workflow verifies the applicant's identity against public third-party data sources, using a KBA quiz of at least four questions that is produced based upon the public

data sources associated with that information. There are over 10,000 public data sources; these sources, and the quizzes, are described in Attachment A.

KBA service results are displayed as "Risk Codes". These codes can illustrate potential identity-related discrepancies, typically related to SSNs, addresses, and date of birth. The combination of KBA pass/failure and risk codes create a full picture of the validity of a person's identity. These results can be used to make decisions regarding applications based on possible duplicate aid and/or the legitimacy of the applicant's identity. Some risk code results or failed quizzes can be resolved quickly through clarifying questions, and others may require further research. These results are returned to the user in the format of a Green, Yellow, or Red profile:

Green – The individual passed the KBA quiz and had no significant risk codes.

Yellow – The individual passed the KBA quiz but risk codes indicate further research may be needed to authenticate the identity.

Red Passed KBA Quiz – The individual passed the KBA quiz, yet there were significant risk codes indicating further research may be needed to authenticate the identity.

Red Failed Quiz – All failed KBA quizzes generate a red result. Instances where the individual fails the KBA quiz and there are risk codes may indicate the individual is not providing accurate identifying information and further research is needed to authenticate the identity.

Person not found or no quiz produced – This results when the information entered in the KBA service did not produce a strong match in the public record data footprint database. This could be due to the information entered being incomplete or incorrect, or perhaps that the individual is a young adult, homeless, undocumented, or a very scant public records file.

III. Structure of the Pilot

The Pilot had three primary objectives:

1. Authenticate identity and prevent duplicate aid through the most client-sensitive means that maintains program integrity.
2. Allow counties to improve intake business processes.
3. Assess potential benefits to clients, and their perception of KBA.

In February 2017, six counties (Placer, Los Angeles, Ventura, Riverside, Napa, and Stanislaus) began piloting the KBA service in 11 county offices with 200 county staff. Two of the pilot counties (Los Angeles and Placer) also used this service for their county General Relief/General Assistance programs. The duration of the pilot was approximately three months. The counties were provided in-person training and ongoing monitoring of the service in each of the participating counties.

The Pilot ran parallel to the current-law SFIS requirements, and client consent was collected to participate in the Pilot. Counties were not allowed to make any case decisions, fraud referrals or conduct investigations based on the KBA results. The KBA service results during the Pilot were sent into a research queue for future discussion with counties about what the results mean and how they could be resolved. Data that was gathered during the Pilot was assembled solely

for the Pilot, and was not otherwise shared nor stored. The identity of applicants for, and recipients of, public assistance is confidential by law.

Also, zero security incidents were reported. Users of the KBA service had to sign agreements to use the service only for applicants assigned to them. Audit logs were used to monitor compliance.

Business Process of the Pilot

- County eligibility workers log-in into the KBA via a virtual private network secure connection. Workers enter the client's name, social security number, birthdate, and address.
- The KBA checks for receipt of aid in the MEDS system (is the applicant already "known to MEDS").
- The KBA then taps into set of comprehensive and current public data collections. (Again, see Attachment A.)
- The system generates four multiple-choice questions. The questions typically relate to prior address history, assets owned, educational history, known associates, and demographic information. Partway through the Pilot, a fifth and sixth question were added, only for clients having difficulty answering the first four questions.
- Clients answer the multiple choice questions, and the system responds with the appropriate risk code described above.
- The KBA service was administered to about 1,800 applicants for CalWORKs and General Assistance.
- During the Pilot, 1,625 individuals completed the SFIS process.
- Clients completed the KBA service during the intake interview, but some percentage of clients did not yet complete the SFIS process (either a no-show or a return appointment hadn't yet occurred).

IV. Pilot Results

Pilot results pertaining to each objective are summarized below.

Objective 1: Authenticate identity and prevent duplicate aid through the most client-sensitive means that maintains program integrity.

- No duplicate aid was found during the Pilot, by SFIS or the KBA service. Both identified the same 20 cases that were in the process of an inter-county transfer due to a client relocating or having two CINs for an identity.
- Although a MEDS query can detect duplicate aid, it does not authenticate identity. KBA provides additional identity authentication by confirming that the applicant is the individual they claim to be.
- Using the applicant quizzes, initially 80 percent of applicants were cleared by green results in roughly four minutes each. (With the addition of the "bonus quiz" discussed below, the green pass rate reached 85 percent in the final weeks of the pilot.)
- 93 percent of quiz-takers found the questions to be easy to answer.

Objective 2: Allow counties to improve intake business processes.

- The KBA Service provided immediate, real-time identification of potential discrepancies with SSN, name, address, and date of birth, compared to three to five business days for Applicant IEVS processing. The immediate identification may allow the county staff to resolve discrepancies during the initial office visit.

- The KBA service provides more information pertaining to the risk of fraud than the current SFIS and Applicant IEVS/MEDS query system, creating an opportunity to streamline county business practices.
- County users reported that the KBA Service was easy to administer. However, user reactions to the helpfulness of risk codes were less positive. This likely results from counties not being allowed to take actions or seek further clarification using KBA service results.
- 85 percent of CalWORKs applicants were identified by the KBA service as “green” (passed quiz and minimal or no risk codes), so there is an opportunity to reduce application processing burdens and timeframes for counties.
- Four-minute average processing time per applicant with the KBA service, versus current SFIS time of approximately 2.33 hours for results.
- Only 3 percent of applicants have a "thin data file" where the system is unable to generate a quiz, which would require use of the current applicant IEVS process instead.
- The average time to train county eligibility workers to use the KBA service was two hours.

Figure 1: KBA Service Results

CalWORKs Applicants Total: 1,053 Duration: March 23-May 31, 2017		
Green	845	80.2%
Yellow	19	1.8%
Red-Passed Quiz, but risk codes Present	73	7.0%
Red-Failed Quiz	80	7.6%
Person not Found or No Quiz Produced	36	3.4%

The Figure above illustrates that 80 percent passed the KBA quiz with no significant risk codes. No additional actions by the county are needed for these cases. Refinements were made to the KBA quiz process during the last three weeks of the pilot, to generate a “bonus quiz” for those who answered with only two, but not the required three, correct answers to the original four questions. This two-question bonus quiz increased the number of green results to 85 percent during the last three weeks.

Also of note, county General Assistance/General Relief applicants had green results nearly 90 percent of the time during the Pilot.

Objective 3: Assess potential benefits to clients, and their perception of knowledge base KBA.

- The KBA Service found a valid identity and produced a quiz for 97 percent of applicants.
- Because 85 percent of CalWORKs applicants were identified by the KBA service as “green” (passed quiz and minimal or no risk codes), there is an opportunity to reduce application burdens and timeframes for most applicants.
- The KBA Service provided immediate, real-time identification of potential discrepancies with SSN, name, address, and date of birth, compared to three to five business days for Applicant IEVS processing. The immediate identification of potential issues may allow clients to resolve discrepancies during the initial office visit.
- 93 percent of clients found the system easy to use; 7 percent had some difficulty.
- Of clients who expressed a preference, 55 percent preferred the KBA service and 45 percent preferred SFIS. There was wide variation by county in this statistic.

- Applicants who preferred SFIS stated that it was easier for them, and they felt it was more secure than the KBA quiz. Applicants who preferred the KBA service indicated that they didn't have to wait, have their picture taken, and that they thought the questions were easy and/or interesting.

What About Yellow and Red Results?

KBA service results were not acted upon. Instead, the "yellow" and "red" cases were referred to a research queue and a sample of those cases was discussed at Program Integrity Workshops for each pilot county. These red results were reviewed during the workshops with a select group of county staff, including eligibility supervisors and representatives from the fraud prevention units.

The purpose of these workshops was threefold:

1. Create an understanding of the KBA service results and associated risk codes
2. Validate accuracy of risk codes on selected cases
3. Solicit feedback from county staff regarding processes and policies around resolving identity issues to continue the eligibility process

This was accomplished through three workshops with each of the six pilot counties. A total of 88 cases were reviewed. Of these cases, it was determined that 83 could have been resolved by the existing intake process including asking clarifying questions, requesting additional documentation and/or clearing Applicant IEVS. It was determined that five of the cases reviewed may have merited an early fraud referral to investigate discrepancies.

Overall, the counties found some value to the risk codes as they relate to eligibility. This ranged from ensuring the county had accurate information regarding the applicant (address, last name, date of birth, etc.) to potential early fraud referrals. During the pilot, it was agreed that further refinement of the risk codes may be helpful to reduce "false positives", thereby reducing the number of yellow and red results and associated time to resolve them.

County staff reported during feedback sessions that, while they liked the KBA service, they would feel more confident in its use as a statewide tool for duplicate aid prevention if there were clear-cut policies and procedures in place to guide them through the process. CDSS agrees, and this would be part of the policy development process if the KBA service is implemented.

Potential Improvements

The pilot experience provided CDSS and the counties with a wealth of information about how the KBA service could be improved if implemented statewide. Three short-term and two-long term improvements are discussed below.

MEDS Data Upload. Assuming the continuation of importing MEDS data will be required to assist with the identification of applicants, there will need to be a more complete MEDS dataset. The current dataset only includes people that have been on cash aid within the last 15 months. Further, the data is only provided once a month. The frequency of the data is important, as it becomes stale quickly, and already is delayed by the time it is imported. An automated daily feed of MEDS into the KBA service would be much better.

Connection Security. There were times that two counties in the Pilot (Stanislaus and Placer) had their virtual private networks (VPN) connections to the KBA Service go down intermittently. This caused the county to lose access to the KBA service. In conversations with the vendor, it

seems that the use of a whitelist of county's IP addresses may be more reliable for a full statewide implementation.

Risk Code Refinement. Further analysis of the various risk codes is needed to refine the process. Some of the yellow and red results may be reduced by filtering out risk codes that have little impact to granting the case, thereby eliminating some false positives and the associated unproductive workload.

Reduction In Required Documents. For the 85 percent of applicants cleared "green" through the KBA system, there could be statutory changes reducing or eliminating certain paper documentation requirements. Any such changes must be consistent with federal TANF regulations. Such changes could greatly reduce burdens on clients to produce supporting documents.

Building Toward a Verification Hub. Future enhancements to this service *could* include direct access through the KBA service to the California Department of Motor Vehicles, EDD, and other neighboring states' data to improve identity verification and eligibility determinations.

Data Sources and Quiz Questions

KBA services collect public records from dozens of categories and hundreds of jurisdictions. The data is gathered from over 10,000 public sources including, but not limited to:

- Credit "header" data from all three credit bureaus (NOTE: No FCRA protected information is leveraged)
- Government agencies including
    - The Social Security Administration's Death Master File
    - DMVs
    - County Assessors
    - Vital Records
    - Professional licensure agencies
- Business datasets such as utility and telephone companies

KBA services include both Identity Verification and Identity Authentication. The service performs Identity Verification to determine if the identity provided to the program is legitimate (for example, a real SSN, if one is provided, and birthdate, are both tied to the name provided). Addresses are also standardized by the system to avoid misspellings and other common mistakes. While identity verification is designed to verify that the identity provided to the program is legitimate, authentication then seeks to ensure that the applicant is in fact the individual that they are representing themselves to be.
The authentication quiz will consist of four multiple choice questions that are designed to be easy for the individual to answer but challenging to manipulate if the applicant is presenting false identity information. Questions generally fall into one of the following categories:

- Address and phone history (such as the street you live on)
- Asset history (such as the color of your car)
- Educational History of applicant or children
- Driver's License/ID card data
- Demographic details (such as DOB/SSN specifics)