Assessing Best Practices in the Administration of Public and Medical Assistance Programs in County-Administered States

Recommendations

June 2023

PUBLIC CONSULTING GROUP

Solutions that Matter

CONTENTS

BACKGROUND

Senate Bill 22-235 charged the Colorado Department of Human Services (CDHS) and Health Care Policy and Finance (HCPF) with assessing the delivery of public and medical assistance programs in the state. As part of the assessment, the departments were charged with making recommendations in the following two areas:

State and county public and medical assistance program policies, processes, size, and structure of program workforce, and information systems infrastructure to ensure:

1. **Improved access by eligible individuals to public and medical assistance programs,**
2. **Timeliness of applications processing,**
3. **Administrative efficiency, and**
4. **Cost effectiveness**

Ongoing evaluation methods of the recommendations for public and medical assistance program system, including appropriate metrics for determining whether the efficiency and cost-effectiveness of the system has improved as a result of the implementation of recommendations.

This document contains draft recommendations for the departments' review. There are two types of recommendations:

Transformative recommendations: Recommendations that will help transform the system itself or the effectiveness of the system. These recommendations will require a year or more to complete.

Quick win recommendations: These recommendations can be implemented more quickly and would result in substantive changes that will improve service delivery more quickly and more easily. These should take less than a year to complete

RECOMMENDATIONS ORGANIZATION

Description	• Describes the recommendation and the justification for it • Outlines which of the four efficiencies will be helped
What does success look like?	• Describes success for clients, counties, and the state
Implementation Plan	• Outlines the various steps spread across three phases to implement each recommendation
Considerations	• Provides additional details like who should be included, policy constraints, costs, and the duration for implementation
Benchmarks	• Describes the metrics, data needed for tracking, and the approach for tracking and monitoring success

BENCHMARKS

Both CDHS and HCPF currently track and measures a variety of metrics to assess the performance of the counties and the state in the administration of the public and medical assistance programs. The three primary metrics are timeliness, accuracy of eligibility determinations, and customer satisfaction. Additional metrics include, but are not limited to, call center wait times, call center speed to answer, and number of customer complaints.

Each recommendation outlined here is expected to improve the existing metrics – either directly or secondarily. Thus, these existing metrics are not specifically discussed in the benchmarking section of each recommendation. Rather, the benchmarks and metrics identified are those that are important and specific to that unique recommendation and must be tracked and measured separately.

RECOMMENDATIONS OVERVIEW

Transformative Recommendation #	Transformative Recommendation
Transformative Recommendation 1	Develop service delivery standards for public and medical assistance programs
Transformative Recommendation 2	Make work accessible and portable
Transformative Recommendation 3	Improve hiring and retention practices
Transformative Recommendation 4	Optimize PEAK
Transformative Recommendation 5	Improve policy documentation and dissemination
Transformative Recommendation 6	Continue with improvements to the current training model

Quick Win #	Quick Win
Quick Win 1	Create opportunities for state and county collaboration
Quick Win 2	Increase communication and collaboration between CDHS and HCPF
Quick Win 3	Align administrative requirements

Recommendation 1: Develop Business Process Standards for Public and Medical Assistance Programs

Recommendation 1: Develop Business Process Standards for Public and Medical Assistance Programs

Colorado currently does not have business process standards for its public and medical assistance programs. As a result, there are 64 different ways that business is conducted, leading to an uneven and unequitable delivery of these programs.

CDHS and HCPF should establish a series of business process standards that all counties must employ. These business process standards can include both the types of activities as well as the technology that must be used. Implementing these standards will allow for more consistency and equity in the customer experience. They will also make it easier for counties to share work, taking advantage of differences in caseload and staffing. **It is critical that any standards that are created be the same across the two state agencies.**

Why Develop Business Process Standards?

Allowing a county to have significant discretion in designing its business processes makes sense for certain types of services, including those that have little cost or negative impact to a Coloradoan when they are delivered differently. However, inconsistent public and medical assistance program delivery can result in significant costs being placed on Colorado's most vulnerable citizens, such as a delay in the delivery of benefits, an incorrect eligibility decision, and potentially a need to repay benefits that were incorrectly issued to them by no fault of their own. Additionally, the lack of standardized and mandated shared technology systems prohibits the counties from easily sharing work, utilizing staff throughout the state, and ensuring that every customer is given the same standard of care and service regardless of where they live.

What Will be Improved by Developing Business Process Standards?

All four areas of focus will be improved by developing business standards: program access, service delivery, administrative efficiency and cost effectiveness

Example: In-Person Interview Standards

All counties must have a method to offer a same day interview to applicants who can't complete a telephone interview or who can't return to the office due to transportation difficulties.

Same day interviews may be conducted with a remote worker. The client can be interviewed by any eligibility worker, regardless of the county in which the worker works. The focus is a reduction in the potential for the client to miss a scheduled interview.

Recommendation 1: What Does Success Look Like?

The lack of business process standards has resulted in the uneven and unequitable delivery of public and medical assistance programs.

For clients, this can potentially mean a different experience based on where they live, delays in the delivery of benefits, and incorrect eligibility determinations.

For counties, lack of shared business processes can lead to feelings of isolation when faced with high caseloads and low staffing levels.

For clients…
Success looks like a consistent experience regardless of where they live in the state. Every client has the same access, gets the same answer, and a correct decision for their benefits.

For counties…
Success looks like clear instructions and expectations from both state agencies on the types of minimum business processes are required and how their performance will be measured. It also identifies ways in which they can work together to best meet the business process requirements.

For the state…
Success looks like the ability to consistently measure county performance in the delivery of services and track the customer experience.

Recommendation 1: Implementation Plan

Plan

Build a project team

- Identify and build a diverse team of stakeholders.

Identify standards

- Gather any existing business process standards and review
- Identify additional business process standards
- Identify technological standards that can or should be in place. Consider the existing technology used by the counties.

Identify fiscal impacts

- Review both existing and additional business process and technology standards to determine any fiscal impacts to the state or counties.
- Determine the degree to which the costs will be allocated to the counties or absorbed by the state.

Develop

Write standards

- Working across all program areas, write detailed standards that clearly identify the minimum service requirements to achieve the standard. Identify where county discretion is permitted.

Establish criteria and measures for evaluating performance

- Establish the criteria that the departments and counties can use to evaluate their performance against the standard.
- Determine measures for evaluating performance and how that data will be collected and reported.

Test standards

- Pilot standards with a representative sample of counties to assess performance.
- Revise as necessary

Execute

Implement standards

Assess performance against standards

Recommendation 1: Considerations

Parties

Drivers: CDHS & HCPF

Stakeholders: CDHS, HCPF, county agencies, CHSDA, CCI

Related Efforts

HCPF has started to implement minimum business delivery standards through the memo series.

State and federal regulations prescribe certain service delivery standards.

Implementation Duration

1 to 2 years

Procurement of technology and by which agency may impact timelines as well as budget.

Recommendation 1: Considerations

Cost

Financial Cost:
- Low financial cost to establish business process standards.
- Medium financial cost to procure technology.
- Cost may be shared by the state and county or assumed solely by either party.

Cost Savings: Assume high cost savings due to implementation of high performing business processes, which will reduce administrative costs. Also reduced administrative costs at the state in having to track and account for differing processes when analyzing data.

Policy

State Legislative Changes: None

Federal Constraints: Business process standards must comply with federal regulations.

Recommendation 1: Benchmarks

There are no new metrics for tracking success of this recommendation. The state should utilize existing metrics (timeliness, customer satisfaction, etc.) to measure success. Much of the work for this recommendation should be focused on the planning and development phases of the implementation phase. The stakeholders should concurrently develop metrics in these phases.

Recommendation 2: Make Work Accessible and Portable

Recommendation 2: Make Work Accessible and Portable

Colorado should implement a **single statewide document and work management system**. This combined system will improve both the customer experience and allow counties to better view and manage their work.

Additionally, it will give Colorado future possibilities to make work portable, allowing the state and counties to move work around in a dynamic manner. The state can also consider implementing a single appointment system, which would allow interviews to be more easily viewed, tracked, and shared statewide.

The implementation of a statewide work management system is currently underway. It is critical that this system include a statewide document management system as well. Most critically, it is essential that the state makes **adoption and usage of the single system mandatory for all counties**. It is also critical that HCPF and CDHS be given funding from the General Assembly to implement this recommendation.

Why One Document and Work Management System?

A single statewide document management system and work management system is a **critical component of administering public and medical assistance programs regardless of whether the programs are state- or county- administered.**

These systems are essential given increased caseloads, the fact that clients frequently move, and the shift to a remote work environment. Having such a system allows for work to become portable and compatible across counties, maximizing efficiency in resources. Failure to have a single system can adversely impact the customer experience and program access.

What Will be Improved by Implementing One Document and Work Management System?

All four areas of focus will be improved by developing service delivery standards: program access, service delivery, administrative efficiency and cost effectiveness.

Recommendation 2: What Does Success Look Like?

Currently, the lack of a single, statewide document and work management system is frustrating to clients and eligibility workers.

For clients, this can potentially mean increased administrative steps and burden if they move to another county and must resubmit their paperwork.

For eligibility workers, this can mean having trouble accessing client files, and information, and the inability to provide a quality level of service.

For clients…

Success look like reduced administrative burden for clients (i.e., do not need to resubmit documentation or reapply in a different county).

For counties…

Success looks like the ability for eligibility workers to access client files and documentation with ease; the ability to coordinate with other counties with ease; and the ability to process cases timely and accurately with a system that supports them to stay organized.

For the state…

Success looks like the ability to gauge workload and distribution across counties; the ability to move work around dynamically, as needed; one, central system that will support workers statewide to process cases timely and accurately.

Recommendation 2: Implementation Plan

Plan

Build a project team

- Identify and build a diverse team of state and county stakeholders.

Identify system requirements

- Establish tools to support requirements gathering.
- Gather technical requirements and desired functionality. This should include collecting input from all levels of county staff and various state staff positions.

Review requirements

- Review the compiled requirements and desired functionality. Risks, dependencies and limitations should be included in this discussion.

Determine ownership

- Determine ownership of the system, which includes ongoing maintenance.

Develop

Decide on the "right" platform

- Determine if the state should procure a new system entirely or if there is sufficient opportunity to leverage and enhance existing systems further before expanding to the entire state.
- Considerations should include at a minimum: budget/costs, procurement and development timelines, requirements (i.e., data migration) etc.

Develop budget request

- Craft the necessary budget request to secure the funding needed for both initial implementation and ongoing maintenance.

Implement

Build or procure the system

- Procure or build the system.

User testing

- Perform user testing with state and county staff using either new or existing processes that are in place for CBMS.

Training

- Develop and facilitate training to all staff.

Rollout

- Establish a date by when any data from existing county systems needs to be integrated
- Establish a date by when existing county systems should be retired.

Recommendation 2: Considerations

Parties

Driver: CDHS & HCPF

Stakeholders: Counties

Related Efforts

State is currently beginning to implement a single work management system and replacing the current Electronic Document Management System.

A third of counties use a homegrown WMS, which could help provide ideas and functionality for a statewide system

Utilize existing Joint Agency Interoperability (JAI)

Implementation Duration

2-3 years to implement statewide

Recommendation 2: Considerations

Cost

Financial Costs: Medium financial cost that will vary depending on if a new system will be procured or if the state will continue with a home-built system. Costs can range from $1.6 M to $2.25 M for initial procurement.[1]

Cost Savings: Counties will experience cost savings from having to procure and maintain their own systems. Counties and the state will experience cost benefits from having a single system that allows for them to track work, which can translate to reduced administrative costs and more efficient eligibility determinations.

Policy

State Legislative Changes: Potential legislative changes if the state needs to mandate the use of the system and needs that to be promulgated.

Federal Constraints: There are no federal constraints. There may be federal funding opportunities available to leverage.

Recommendation 2: Benchmarks

Metric to Assess Success	Data Needed to Track and Monitor Success	Approach to track and monitor success
100% of counties are using the system	• Number of counties that have the implemented the system	1. Identify how you will collect the data 2. Collect data at specific cadence 3. Monitor progress at existing monitoring or state-level meetings
100% of county eligibility workers are trained on the system	• Total number of county workers • Number of county workers who have been trained	1. Identify how you will collect the data 2. Collect data at specific cadence 3. Monitor progress at existing monitoring or state-level meetings
Worker satisfaction with system	• Answers from worker survey that gauge satisfaction with the system overall and with specific features	1. Administer and analyze a worker satisfaction survey
Ease of use	• Questions that gauge work satisfaction with the system overall and with specific features • Time records that measure the length of time for specific tasks within the system	1. Administer and analyze a worker satisfaction survey 2. Administer and analyze a time study

Recommendation 3: Improve Hiring and Retention Practices

Recommendation 3: Modernize and Customize Eligibility Worker Roles, Career Paths, and Compensation

One way that Colorado can improve its delivery of public and medical assistance programs is by improving the hiring and retention practices for eligibility workers. There are four inter-related recommendations that Colorado should focus on implementing in this area.

- Update classification from clerical to professional grade
- Create a series of positions to improve career ladders and recognize unique skillsets and job requirements
- Update pay ranges to promote statewide comparability
- Enable continuous recruitment and centralized online postings

Why Modernize and Customize Roles, Career Paths, and Compensation?

This series of recommendations would address a number of challenges found as a part of the assessment process. Many counties are facing eligibility workforce shortages and are struggling to recruit. The average tenure of an eligibility worker is three years, which means that critical institutional knowledge is not being retained. Salaries appear to fall considerably below living wages in most counties depending on the family composition of the worker. We also heard anecdotally that workers move between counties based on pay and evolving hybrid workforce policies

What will be improved by Modernizing and Customizing Roles, Career Paths, and Compensation?

- Increased job satisfaction through roles more tailored to employee preferences and skills.
- Increased retention and decreased turnover, along with savings on hiring, training, and other onboarding costs.
- Improved quality, accuracy, and timeliness of service delivery from an experienced and stable workforce.

Recommendation 3: Sub-Recommendations

1 Update job classification from administrative/clerical grade to professional grade

Currently, some counties have eligibility workers classified as professional positions, while others are classified as administrative and clerical. This recommendation proposes moving all eligibility positions into a professional classification to reflect the current complexity of their roles and required skillset. This change will become even more critical as the straightforward, less complex work is increasingly automated to require less worker interaction, while the work that requires human intervention will be increasingly complex. Examples of this dynamic include recommendations to improve PEAK included in this report, as well as the work that has been done to increase the ex parte renewal rate in Medicaid.

2 Create a series of job descriptions to improve career ladders and recognize unique skillsets

Position customization would allow counties to recognize workers skilled in complex cases, with language skills such as Spanish, as well as defining primary duty location based on need, e.g., an in-office position to handle walk-in applications and interviews. Additionally, building in-person, hybrid, and remote standards into the job descriptions mitigates the need to harmonize county telework policies more broadly.

3 Enable continuous recruitment and centralized online postings

If positions are standardized across counties, it could enable continuous recruitment and reduce the time to move from a vacancy to a posting. These positions could also be posted in a central location, such as on the HCPF and CDHS websites, and include which counties were currently hiring for which roles, linking to the county hiring website as well. This is intended to increase the number and diversity of qualified candidates.

4 Review and update salaries to promote statewide comparability

Under this approach, jobs would have the same base pay rate across the state. However, there could also be two types of locality adjustment. The first would be a cost-of-living adjustment to recognize the vast differences between regions of the state. The second could be for under-resourced counties where it is particularly hard to recruit workers. This would create a system where an eligibility worker could afford to live in Eagle or Boulder County but would still provide an incentive for prospective workers in frontier counties.

Recommendation 3: What Does Success Look Like?

The challenges in hiring and retention impact all areas of county-administered programs.

For clients, this can potentially mean a different experience based on where they live, delays in the delivery of benefits, and incorrect eligibility determinations.

For counties, this can mean an overextended workforce, higher turnover, and managers' time increasingly pulled into filling vacancies, all of which contributes to a challenging work environment.

For clients…
Success looks like an improved customer service through a workforce that is more experienced, stable, and has roles increasingly tailored to their skills and preferences.

For counties…
Success looks like higher employee satisfaction, increased ability to hire and retain talented employees, and fewer vacancy-driven backlogs.

For the state…
Success looks like compliance with federal service standards, the ability to partner with the county teams to successfully lift policy and operational initiatives, and increased feedback from and collaboration with an experienced county workforce.

Recommendation 3: Implementation Plan

Plan

Build a project team

- Identify and build a diverse team of stakeholders.

Engage county and state leadership

- Get feedback on proposals and agreement on broad parameters.

Engage county HR teams

- Identify technical and HR policy obstacles at the state level, options to address them and/or tweaks to the approach to make it feasible.

Align on conceptual approach

- Get consensus from stakeholders and decision-makers on the proposal and key attributes.

Develop county staffing and pay plan

- Identify what the new base levels of pay should be, as well as how positions may change and any position gaps that would need to be a priority for filling vacancies.

Develop

Build the budget request

- Based on new staffing and pay plan.
- Include outyear savings estimates to provide context.

Request and respond to budget

- Have phased and reduced scope approaches developed and estimated to support negotiations as needed.

Develop updated position descriptions

- Draft, vet, and approve PDs so implementation can begin if/when budget is approved.
- Begin discussions with current staff on overall plan as well as opportunities for their role to evolve.

Develop implementation plan

- Map out an implementation approach with roles and responsibilities

Execute

Reclassify current employees according to new positions

- Based on identified skillsets and preferences

New rates of pay take effect

- Timing can be calibrated according to available year one funding while the full cost will take effect in year two.

Begin posting updated positions in central location

- Leverage opportunities to share information on vacancies to a broader audience.

Monitor tenure, vacancy rate, and other key metrics to identify changes in trend and outcomes

Recommendation 3: Considerations

Parties

Drivers: CDHS & HCPF & county managers

Stakeholders: Board of County Commissioners, county HR teams, and field staff. County and state budget offices and General Assembly.

Related Efforts

There could be increased efficiencies if this effort were coupled with work-sharing across counties (and its technological requirements). For example, the easier it is for workers with second-language skills to work with applicants of that language, regardless of their county of application, the easier it will be to improve outcomes and drive increased savings in the translation contract.

Efforts to improve the training and onboarding of eligibility workers will further contribute to a productive, stable, and satisfied workforce.

Implementation Duration

2-3 years to implement statewide, including the state budget cycle

Recommendation 3: Considerations

Cost

Financial Cost: Medium to high financial cost, which is dependent on the extent to which the change in classification and customization increases pay and the extent of additional funds appropriated by the General Assembly.

Cost Savings: High cost savings associated with reduced turnover and processing efficiency and accuracy.

Policy

State Legislative Changes: Unlikely but could potentially require HR policy changes or accommodations at the county level.

Federal Constraints: Federal administrative funding estimates should be incorporated into broader budget planning

The Colorado Department of Personnel and Administration may be able to offer technical assistance with this approach, even though the positions would remain with the counties.

Recommendation 3: Benchmarks

Sub-Rec	Benchmark	Metric to Assess Success	Data Needed to Track and Monitor Success	Approach to track and monitor success
1	Number of counties that have eligibility workers classified as administrative positions	Increase in percentage of counties that have re-classified eligibility workers to professional classification by [established date]	Classification determination for EWs for each county	1. Identify mechanism to collect this data 2. Schedule collection 3. Analyze data to measure success
2	None - dependent on county agreement or coalition building	N/A	N/A	N/A
3	Eligibility workers salary by county	Percentage of eligibility workforce that has moved to the new pay standard	Salary ranges by county	1. Identify mechanism to collect this data 2. Schedule collection 3. Analyze data to measure success
3	Eligibility workers staffing levels by county	Percentage of eligibility workforce within each locality adjustment	Staffing levels by county	1. Identify mechanism to collect this data 2. Schedule collection 3. Analyze data to measure success

Recommendation 3: Benchmarks

Sub-Rec	Benchmark	Metric to Assess Success	Data Needed to Track and Monitor Success	Approach to track and monitor success
4	None - dependent on county HR policies	N/A	N/A	N/A
General	Eligibility workers vacancy rate by county	Decrease in number of vacancies by county and locality	Vacancy rate by locality	1. Identify mechanism to collect this data 2. Schedule collection 3. Analyze data to measure success
General	Time to fill an eligibility worker vacancy by county	Decrease in time to fill by county and locality	Length of time to fill by county and by position	1. Identify mechanism to collect this data 2. Schedule collection 3. Analyze data to measure success
General	Average and median tenure for eligibility workers by county	Increase in median tenure	Tenure by county	1. Identify mechanism to collect this data 2. Schedule collection 3. Analyze data to measure success

Recommendation 4: Optimize PEAK

Recommendation 4: Optimize PEAK

Current status of PEAK:

Colorado should make changes to PEAK to **improve how both clients and eligibility workers interact with the platform**. The state has already made numerous changes to improve PEAK's functionality and accommodate both federal and state mandates, but the overall impact of those changes has reportedly been negative, particularly for workers. By implementing a new series of recommended changes, and exploring additional improvements, PEAK can become an even more effective tool in providing seamless access to benefits statewide.

Recommended changes to PEAK include a mix of updates to existing features, and the implementation of new features in collaboration with stakeholders. Another more intensive approach may be to completely redesign or overhaul the system, which would allow the state to better map and integrate PEAK into CBMS and the overall eligibility workflow. If changes are made to PEAK, the state may consider go through a rebranding effort to address the negative views of the system shared by both clients and staff alike.

Why is a Fully Optimized PEAK Crucial to Colorado's Success?

An online system like PEAK can be a tremendous help for both eligibility workers and clients. However, PEAK's current functionality is not designed in a way that is helpful to either party. As a result**, both clients and workers are frustrated by the system and do not find it useful.**

Colorado.gov/PEAK
COLORADO
PEAK™

Recommendation 4: Sub-Recommendations

The following five recommendations address the **most common pain points identified through our assessment by both clients and eligibility workers**. Addressing these five areas will exponentially improve the PEAK experience for all parties. If resources allow, a more in-depth overhaul of PEAK in conjunction with stakeholders would yield further increases in productivity and benefits processing.

1 Restrict the Type of Changes Clients Can Make

Clients can currently edit and delete information that was entered either by a worker or verified through an interface. Interfaces, or information that come directly from another state system, should never be modified or deleted because they come directly from that other system and reflect true and factual information. When mandatory information is edited or deleted by a client, the information needs to be recreated, which requires significant time and effort by the worker. Restricting client changes to fields that do not require worker verification (such as an email or phone number change) will save workers time and prevent a delay in benefits.

2 Restrict the Frequency of Changes Allowed by Clients

Currently there is no restriction on the number of times that clients can submit the *same* change, which results in multiple change report forms for a single edit. By providing a receipt for submitted changes, clients can have peace of mind knowing that their edits are pending verification by an eligibility worker.

3 Simplify Change Reporting

The current change report form generated by PEAK does not call out the actual changes that clients made. A report that highlights just the new additions or edits from clients would speed up the change verification process and address the change report backlog that currently exists in the state.

Recommendation 4: Sub-Recommendations

4 Include Clear Navigational Language

Adding clear navigational language for clients during the application and recertification process will simplify the process for clients and reduce eligibility workers time to rework the information. Client confusion or exhaustion can lead to incomplete applications. Navigational language at each step of the process will lead to an increased number of complete applications and recertifications. This will address the high number of incorrectly expedited applications the state is currently seeing.

5 Aligning PEAK with Paper Forms

Aligning the paper and PEAK application and recertification methods will improve data entry and processing efficiency as eligibility staff will have an easier time moving between two methods found in their daily workflow.

6 Train Staff on PEAK

Eligibility workers currently don't receive any training on PEAK, which limits their ability to provide help to clients. The state should provide PEAK training to eligibility workers, including creating a sandbox environment so that workers can directly interact with the system in the same way as clients. Providing training will ensure that staff are able to address client questions regarding the PEAK platform and to better walk clients through common issues, thereby increasing the client's technical knowledge and increase the number of correct and complete submissions.

Recommendation 4: What Does Success Look Like?

Currently, the shortcomings of PEAK are leading to worker frustration and client confusion.

For clients, this is leading to a high volume of incomplete applications, duplicate change reports, and contact to county offices seeking help with PEAK.

For eligibility workers, aspects of PEAK are leading to increased time spent working cases, delaying benefits, and adding additional tasks to their workflow.

For clients…
Success looks like an easy digital experience where clients understand what they can and can't do within the system, the time frames for when digital information is processed, and that that the platform is failsafe regarding known frequent user errors.

For counties…
Success looks like less time spent fixing client caused errors and finding information on long and unwieldly documents. It also looks like staff celebrating that the technology in their workflow has improved their efficiency instead of slowing them down.

For the state…
Success looks like faster processing time for benefits, staff that feel supported in their workflow, and clients who move through the process faster and with less confusion.

Recommendation 4: Implementation Plan

Plan

Build a project team

- Identify and build a diverse team of stakeholders.

Identify components of features

- Flesh out the required features and functionality.
- Utilize stakeholder workgroups with clients and county workers and supervisors to determine the specific changes and improvements that are needed.

Obtain estimate

- Utilize the existing estimate process to get an estimate of the various changes
- Determine the amount of funding needed

Outline priorities

- Based on available funding, determine which features will be prioritized if cost is a restrictor to the project scope.

Develop

Write business requirement documents

- Prepare the BRD with the necessary functionality.
- Establish criteria for evaluating functionality

Review technical design documents

- Collectively review the TDD and ensure that it meets all requirements.

Test Features

- Test the features using the current test process utilized for CBMS.

Execute

Train workers

- Develop and facilitate training to all workers on PEAK updates
- Develop and facilitate training to all workers on the client side of PEAK

Announce optimized PEAK

- Rebrand PEAK
- Conduct marketing campaign on rebranded PEAK
- Develop standing methods for collecting and documenting feedback and suggestions on future changes for PEAK.

Recommendation 4: Considerations

Parties

Driver: CDHS & HCPF

Stakeholders: CDHS, HCPF, eligibility workers, and clients

Related Efforts

Current work with Code for America

Statewide document and work management system implementation

PEAK team has an annual allotment of 25,000 hours to make changes within the system

Implementation Duration

1-2 years to rollout, continuous upkeep and modifications are recommended

Recommendation 4: Considerations

Cost

Financial Cost: For changes within the existing PEAK system there is a low financial cost, estimated to be less than $1,000,000. The cost would be substantially higher if a new system were to be procured or built.

Cost Savings: High cost savings due to reduced inaccurate information and work coming into the counties. This will translate to more efficiency by workers, which will allow them to determine eligibility for more households.

Policy

State Legislative Changes: None

Federal Constraints: Federal requirements around program access and electronic applications and document submission.

Recommendation 4: Benchmarks

Sub-Rec	Benchmark	Metric to Assess Success	Data Needed to Track and Monitor Success	Approach to track and monitor success
1	Number of changes made in PEAK that do not go through real time eligibility (RTE)	Reduction in the amount of time to process a client generated change	Length of time to process a client generated change by type/category of change	Administer and analyze a time study
1	Number of changes made in PEAK that are not RTE	Reduction in the number of changes that need to be uploaded versus RTE	Number of changes that go through RTE	Identify if currently system reports track this data
2	Frequency with which the same household submits a change on the same day	Reduction in the frequency with which the same household submits a change on the same day	• Number of changes that are submitted on the same day by the same household • Number of instances when the same change was reported	Identify if currently system reports track this data. If not, work with counties to obtain a manual count over a specific period of time
4	Number of applications that are considered complete when submitted	Increase in the percentage of applications that are considered complete when submitted	Number of applications that are not considered complete	Identify if currently system reports track this data. If not, work with counties to obtain a manual count over a specific period of time
4	Number of recertifications that are considered complete when submitted	Increase in the percentage of recertifications that are considered complete when submitted	Number of recertifications that are not considered complete	Identify if currently system reports track this data. If not, work with counties to obtain a manual count over a specific period of time

Recommendation 4: Benchmarks

Sub-Rec	Benchmark	Metric to Assess Success	Data Needed to Track and Monitor Success	Approach to track and monitor success
4	Number of calls coming into PEAK help desk	Decrease in the number of calls coming into the PEAK desk asking for help with completing the application or recertification	Number of calls coming into PEAK help desk	Identify if currently system reports track this data. If not, create report to measure data
4	Drop off rate by page in the application flow	Reduction in the overall drop off rate prior to submission	Drop off rate by page in the application flow	Identify if currently system reports track this data. If not, create report to measure data
4	Drop off rate by page in the recertification flow	Reduction in the overall drop off rate prior to submission	Drop off rate by page in the recertification flow	Identify if currently system reports track this data. If not, create report to measure data
4	Current rating in app store	Increase in the app store rating	Rating in app store	Collect rating from PEAK team
4	Number of PEAK applications that are classified as expedited food assistance	Reduction in the number of PEAK applications that are incorrectly classified as expedited food assistance	Number of PEAK applications that are incorrectly identified as expedited	Identify if currently system reports track this data. If not, work with counties to obtain a manual count over a specific period of time
6	None	Number of eligibility workers who have completed PEAK training	• Total number of eligibility workers • Number of workers that have completed PEAK training	Pull report from CoLearn LMS

Recommendation 5: Improve Policy Documentation and Dissemination

Recommendation 5: Improve Policy Documentation and Dissemination

Policy is the backbone of Colorado's public and medical assistance programs and guides all decisions that workers make each day. At present, policies/regulations and training materials live in different locations, the process to change is different between CDHS and HCPF and is not overly transparent, and the regulations are difficult to understand due to the language used. Based on this, **the state should improve the overall policy documentation and dissemination process.**

Why Improve Policy Documentation and Dissemination?

All levels of county staff rely on Colorado's administrative regulations to guide their work and answer questions. However, the administrative regulations are written in a very formal and legal voice and each program area has their own set of regulations, which may be misaligned (either CDHS or across CDHS and HCPF). Failing to have a single location for all regulations, as well as misaligned regulations that are not written in a straightforward way can negatively impact clients.

What Will be Improved by Improving Policy Documentation and Dissemination?

All four areas of focus will be improved by developing service delivery standards: program access, service delivery, administrative efficiency and cost effectiveness.

What Workers Said about Policy Documentation and Dissemination:

- "I don't know how exactly to say this but **make things more black and white**. The rules are not always clear. and we do not always know how to apply the rule correctly."
- "I think that all of policy is difficult for clients. Because it's written by attorneys, **it's all incredibly difficult and complex language**. Long, complex sentences with a bunch of terminology that is unfamiliar. We deal with a lot of clients who have a lower reading level, so having a clearer way of stating things would be very beneficial to them."
- "I would **make policy clearer to understand** and maybe a little more black-and-white so that there isn't as much room for interpretation between eligibility workers/counties/state."
- "Having rules/regs in a **format that allows workers to process more effectively**." (*When asked what they would change if they were given a magic wand)*
- "Program policy that is **easier to read and understand**." (*When asked what they would change if they were given a magic wand*)

Recommendation 5: Sub-Recommendations

1 Align Common Policy Requirements, Where Possible

Aligning policy requirements, where possible given federal and state constraints or limitations, will be a major improvement for both clients and counties. Examples of elements that fall under this recommendation include interview requirements, change reporting and verification requirements. The West Virginia Department of Health & Human Resources has produced an Income Maintenance Manual that has determined areas of commonality in the SNAP, Medicaid and TANF (WV WORKS) programs as well as designating topics that are program-specific.

2 Align the Process Used to Modify Regulations Across Both Departments

CDHS and HCPF currently update regulations in a different way and these changes are not easily identified in the administrative regulations. The state should implement change notices, which document the reason behind policy changes, provide an overview of the change, and clearly document the change. An example of this can be found in Virginia's shared manual which includes the regulations and links to transmittals with updates to policy, on the same home page. North Carolina and North Dakota's manual also include examples of change notices as well as show how the state has centralized changes, administrative letters, and regulations in one manual.

3 Create a Policy Collaboration Team

Colorado should create a joint Policy Collaboration Team who would be responsible for maintaining the policy manual and also would look at all proposed regulation changes to identify if they are aligned. The team would be composed of members from CDHS and HCPF as well as county representatives and other stakeholders. Arizona instituted a similar team in order to update their new CNAP manual.

Recommendation 5: Sub-Recommendations

4 Create a Single Policy Manual

Having a single policy manual will serve both clients and county staff as being the lone location to find all public and medical assistance policies. This manual should:

a. Use clear and plain language so that the reader can easily and quickly understand it.
b. Take advantage of available formatting such as tables, charts and visual aids such as highlighting examples and reminders to help the reader better comprehend the information. This would also include identifying the dates of a policy's revision.
c. Have multiple methods for searching.
d. Utilize hyperlinks to allow the reader to move between relevant sections more easily. Hyperlinks can also be to reference documents, such as training aids and policy clarification memos would assist workers in their understanding of the topic.
e. Include a glossary and table of acronyms.

An example of policy manual that achieves these goals is Oregon's Programs Eligibility Notebook. Wisconsin's FoodShare and BadgerCare Plus policy handbooks are prime examples of enhanced search functionality.

5 Establish a Central Repository for All Resources

Several states have created online portals or repositories for eligibility workers that house their policy manuals, policy updates change notices, training materials, and answers to questions. The repository may also include a means for the counties to submit policy questions to the state. Minnesota hosts County Link, a website site for all the policy-related resources available to its counties.

Recommendation 5: What Does Success Look Like?

Policy that is unclear, difficult to navigate, and hard to interpret makes the delivery of public and medical assistance programs more challenging.

For clients, not understanding the policies being applied to them can lead to frustration and confusion, sometimes causing them to submit additional and unnecessary documents.

For counties, this leads to inconsistency in the application of policy and a greater prospect of program errors.

For clients…

Success looks like a single place to go to for finding policy questions across the variety of programs that they household may be getting. This place gives clear answers that help the client understand what they need to do or why certain actions are being taken.

For counties…

Success looks like a single location that houses all policy, training materials, policy questions, and memos. This location has a smooth design, is easy to navigate, and has plain language with examples.

For the state…

Success looks like the creation of a single team to produce and maintain a living document that supports both clients and staff. It is also a shared commitment to make changes in a consistent way to smooth out potential confusion.

Recommendation 5: Implementation Plan

Plan

Build a project team

- Identify and build a diverse team of stakeholders.

Map out current change processes and Department requirements

- Identify the current processes used to update policy and the reasoning for those processes
- Identify which processes can be aligned
- Map out the current communication process for policy changes and how they can be aligned

Identify common policy requirements

- Utilize the CO ABP spreadsheet to identify common policies
- Identify which policies can be aligned based on federal and state limitations

Develop

Develop budget request

- Identify if the creation of the single policy manual and central repository will be completed “in-house” or by an outside contractor.
- Identify the number of hours needed and personnel needed if the projects will be done “in-house”. This includes both initial development and ongoing maintenance.
- Some costs are human, and some are technology.

Submit budget request

Create a Policy Collaboration Team

- Create a policy collaboration team comprised of staff from both state departments, the counties, and the Staff Development Division.

Execute

Create integrated policy manual

- Develop manual
- Test manual

Establish central repository

- Pull together all necessary resources
- Create organization for the repository
- Establish methods for searching
- Identify time frame for moving existing content to new repository
- Identify date by when previous locations will be decommissioned.

Develop shared process for policy changes

- Establish a uniform policy update process that makes it easier for counties to understand policy changes

Recommendation 5: Considerations

Parties	Related Efforts	Implementation Duration
Driver: CDHS and HCPF	There are numerous examples of excellent manuals and online repositories that will help reduce the amount of time needed to create the bones of the manual.	12 – 24 months
Stakeholders: CDHS, HCPF, SDD, Counties	As a part of this assessment, the vendor created a comprehensive spreadsheet of common policies across the CBMS programs. This will reduce the amount of initial work needed to find these common policies	

Recommendation 5: Considerations

Cost

Financial Cost: Medium financial cost that is dependent on if the Departments need additional staff to meet the requirements, even if a contractor is used for the initial development.

Cost Savings: Assumed high cost savings resulting from fewer inaccurate eligibility decisions and improved efficiency in case processing. The latter created from policy answers that are easier to find and understand. For state staff, cost savings are from reduced questions to the policy email boxes.

Policy

State Legislative Changes: None

Federal Constraints: Federal constraints will exist in the alignment of certain policies. There are no federal constraints around creating an integrated manual or having a single online repository for documentation.

Recommendation 5: Benchmarks

Sub-Rec	Benchmark	Metric to Assess Success	Data Needed to Track and Monitor Success	Approach to track and monitor success
1	None	Increase in the number of clicks/visits to the manual	Webpage click data	1. Identify mechanism to collect this data 2. Schedule collection 3. Analyze data to measure success
2	None	Increase in the number of clicks/visits to the central repository	Webpage click data	1. Identify mechanism to collect this data 2. Schedule collection 3. Analyze data to measure success
1, 2	Current worker satisfaction with interpreting policy	Increase in worker satisfaction with interpreting policy	Worker satisfaction	1. Administer and analyze worker survey
1, 5	Current worker satisfaction with locating policy	Increase in worker satisfaction with locating policy	Worker satisfaction	1. Administer and analyze worker survey
1, 2, 3	Number of emails received into each program area email box	Decrease in the number of emails that require a simple answer	Count of emails received Classification of emails to allow for assessment	1. Categorize incoming emails for a specific period of time 2. Assess the categories to measure success

Recommendation 6: Continue with Improvements to the Current Training Model

Recommendation 6: Continue Improving the Current Training Model

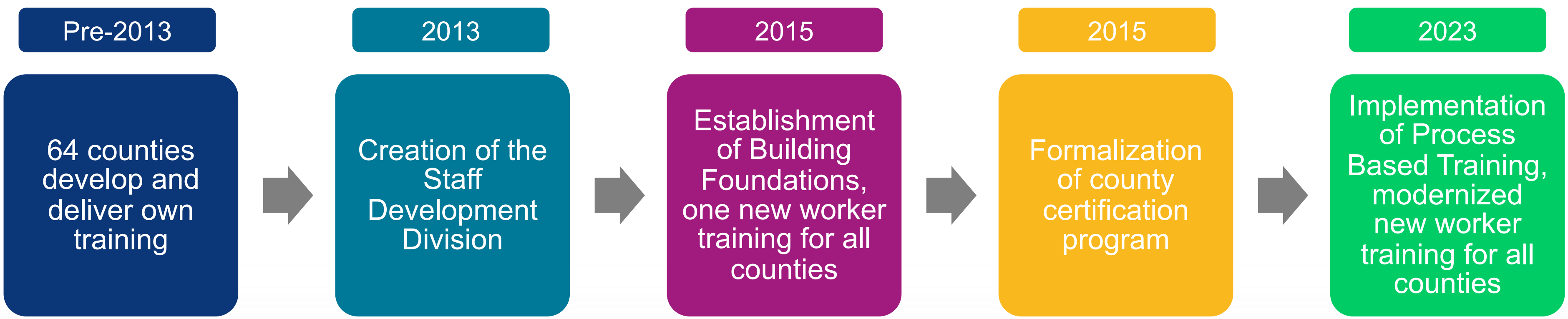
Colorado currently has a quasi-centralized training model for CBMS programs, where the state develops the training content and said content may be delivered by a state trainer or a county trainer who has been certified. This leads to counties delivering the training differently. The inconsistency is largely the result of whether a county has a trainer as part of its staff. Counties reported taking widely varied approaches to the order of programs staff learnt, whether a county utilized a nesting period with new staff and length of time someone would be nesting. **Variation to approach has resulted in work performance differences in new employee' skill level**.

Why Continue with Improvements to the Current Training Model?

While the State's Staff Development Division (SDD) creates standardized content for the onboarding of new staff, the process of training and nesting occurs in an inconsistent manner across counties. The inconsistency is largely the result of whether a county has a trainer as part of its staff. Counties reported taking widely varied approaches to the order of programs staff learnt, whether a county utilized a nesting period with new staff and length of time someone would be nesting. Variation to approach has resulted in work performance differences in new employee' skill level.

What Will be Enhanced by Continuing to Improving the Current Training Model?

All four areas of focus will be improved by developing service delivery standards: program access, service delivery, administrative efficiency and cost effectiveness.



Recommendation 6: Sub-Recommendations

1 Modernize the Sandbox (training) Environment

The sandbox (training) environment should match the functionality of the production system. New workers should be able practice processing of applications for households that previously received benefits as well as ongoing work (recertifications and changes during the certification period). Ideally, the system should allow for staff to practice with interfaces.

2 Integrate Complex Case Scenarios

New worker training should incorporate more complex case scenarios that are similar to those that a worker will see when they leave training. This includes how to read and act on data that interfaces into CBMS. occur.

3 Implement Nesting Statewide

Nesting periods, or the length of time a trainee spends in nesting, should be standardized and facilitated by state staff. Additionally, the work/tasks that staff complete while in nesting should be standardized to assist with creating a training environment that produces knowledgeable, efficient staff, quickly.

4 Transition to State-Delivered Training

The state is ultimately responsible for administering the public and medical assistance programs and part of this administration includes ensuring that workers are trained equitably and consistently.

Recommendation 6: What Does Success Look Like?

The variation counties take to training and nesting has resulted in work performance differences in new employees' skill level.

For clients, this can mean a different experience based on which county they reside in. This may result in benefit issuance delays or interruptions and/or inaccuracy of casework.

For counties, this can mean it takes more time to have an employee be well trained across all programs.

For clients…
Success looks like confidence in their Eligibility Technician and an understanding that regardless of which County they reside in, they'll work with someone who is knowledgeable, efficient and well-informed.

For counties…
Success looks like being able to integrate new eligibility workers into the workforce immediately after training concludes. Additionally, having well trained staff will allow supervisors to prioritize their traditional supervisory responsibilities.

For the state…
Success looks like a workforce that has been consistently trained, allowing them to consistently apply policy regardless of where they work. As a result, there is reduced risk of sanctions or penalties related to timeliness or accuracy.

Recommendation 6: Implementation Plan

Plan

Build a project team

- Identify and build a diverse team of stakeholders.

Identify additional sandbox enhancements

- Determine what additional sandbox enhancements are needed in order to fully match the sandbox environment to the production environment

Develop

Develop nesting standard

- Develop the standards for nesting that all counties will follow. Standards should include how progress will be assessed, who can provide or supervise nesting, time frames for reviewing working, and how nesting will be provided.
- Create strategies for how nesting can be provided in counties that have limited or no infrastructure (limited staff, etc.). This may include consortia or virtual nesting provided by the SDD

Establish checklist for types of case actions

- Borrowing from apprenticeship models, create a checklist for each program that identifies the specific types of case actions or activities that a worker must have seen and successfully completed in order to move on

Create case scenarios

- Create new case scenarios that will take advantage of the system enhancements.

Execute

Establish staffing needs

- Determine how many SDD trainers are needed to provide timely and sufficient training to all new workers.
- Create schedule for frequency and cadence of trainings
- Identify how additional training positions will be funded (new dollars, reallocation of county dollars to the state, etc.)
- Develop budget request, if necessary

Determine role or responsibilities of county trainers

- Determine what role or responsibilities the county trainers will retain.
- Create standards for county training

Update nesting standard, as appropriate

Develop timeline for transition

Recommendation 6: Considerations

Parties

Drivers: CDHS and HCPF

Stakeholders: CDHS, HCPF, SDD, Counties

Related Efforts

The Staff Development Division has recently made several changes to its training model. While transitioning training from the counties to the state will be a significant change, many of the secondary recommendations will serve as enhancements to the model they're currently utilizing.

Implementation Duration

1-2 years

Recommendation 6: Considerations

Cost

Financial Cost: Medium financial cost due to the need for additional staff at the SDD if all training is to shift to being facilitated by them. Additional costs would include support for nesting in those counties that lack staff who can sufficiently provide this support.

Cost Savings: High cost savings as new workers are receiving consistent training that is complete and comprehensive for both policy and system requirements. New staff are able to transition from the training room to a supportive nesting environment, which encourages deeper understanding of the programs. When staff transition to the floor, they are making accurate eligibility determinations and are helping more households more quickly than in the current state.

Policy

State Legislative Changes: None

Federal Constraints: None

Recommendation 6: Benchmarks

Sub-Rec	Benchmark	Metric to Assess Success	Data Needed to Track and Monitor Success	Approach to track and monitor success
1	Number of staff that are trained by the SDD	Increase in the number of staff trained by the SDD	Number of staff that are trained by the SDD	1. Pull report from CoLearn LMS
1	Number of audit findings	Decrease in the number of audit findings that are caused by incorrect policy application or interpretation	Number of audit findings by program area that were caused by incorrect policy application or interpretation	1. Identify report needed to track audit findings 2. Collect data at specific cadence 3. Monitor progress at existing monitoring or state-level meetings
1	Number of client complaints	Decrease in the number of client complaints that are caused by incorrect policy application or interpretation	Number of client complaints by program area that were caused by incorrect policy application or interpretation	1. Identify report needed to track audit findings 2. Collect data at specific cadence 3. Monitor progress at existing monitoring or state-level meetings
2	Number of counties providing nesting	Increase in number of counties providing nesting	Count of counties that are providing nesting	1. Identify report needed to track audit findings 2. Collect data at specific cadence 3. Monitor progress at existing monitoring or state-level meetings

Recommendation 6: Benchmarks

Sub-Rec	Benchmark	Metric to Assess Success	Data Needed to Track and Monitor Success	Approach to track and monitor success
2	Nesting duration by county and corresponding accuracy rates	Standardization of nesting time frames by county	Duration of nesting by county by program	1. Identify report needed to track audit findings 2. Collect data at specific cadence 3. Monitor progress at existing monitoring or state-level meetings
2	Nesting duration by county and corresponding accuracy rates	Increase in the quality of nesting	• Decrease in the amount of time needed for a new worker to move out of nesting • Increase in the amount of work new workers can process at 6, 9, and 12 months after leaving training	1. Identify report needed to track audit findings 2. Collect data at specific cadence 3. Monitor progress at existing monitoring or state-level meetings
General	Eligibility worker turnover/vacancy rate	Decrease in the turnover/vacancy rate	Vacancy rate Tenure prior to exit	1. Identify how to collect data 2. Collect data at specific cadence 3. Monitor progress at existing monitoring or state-level meetings

Quick Wins

Quick Win 1: Create Opportunities for State and County Collaboration

The counties and states depend on one another to deliver public and medical assistance benefits to Colorado residents. Survey results showed that there are some areas where collaboration between the two groups could be strengthened. Specific opportunities for collaboration include:

Improving the Process for Responding to Policy and Case Questions

A major way for counties to get help is by emailing the state with questions. The county may need to email multiple program areas for a single case, with each program area providing their own response.

Specific improvements in this area include:

a. Establishing expectations for counties on how to document what steps were taken to attempt to locate the answer they're seeking guidance on.

b. Establishing expectations for state responses so that they are helpful. Responses should be comprehensive and provide examples of how to apply policy to the case, rather than responding with rule.

c. Requiring that the program areas coordinate their responses when policies are misaligned.

Holding Policy & System Case Review Meetings

The state should hold recurring meetings where they staff complex cases or cases where policies or system data entry requirements are misaligned. **These cases are separate from quality assurance and control cases and would instead come from the policy and system questions that come from the counties to the state email inboxes.** The findings from these meetings should be disseminated to county staff and should also be used to adjust policy and data entry requirements, where possible. This meeting could include representatives from the county to involve all stakeholders.

Quick Win 2: Increase Communication and Collaboration Between CDHS and HCPF

It is critical that HCPF and CDHS communicate and collaborate between one another given their oversight role of Colorado's public and medical assistance programs. In a state with a prominent culture of local control across 64 different counties who must administer all programs with no ability to silo, effective collaboration and partnership at the state agency level is paramount.

Opportunities for enhanced communication and collaboration between CDHS and HCPF include:

Holding Regular Meetings with Representatives from Both Agencies

CDHS and HCPF should meet on a regular cadence, such as biweekly, and discuss the following:

a. Current challenges/issues across programs

b. Upcoming changes and impacts on all programs and operations

c. Timeliness and accuracy updates

d. Review of the current workload across programs

Exploring Strategies for How to Best Engage and Communicate with the Counties

There is an opportunity for CDHS and HCPF to learn from one another on what communication practices are effective and working well and where there are opportunities to learn from one

Quick Win 3: Align Administrative Requirements

The three program areas should align as much as possible on the administrative requirements that are mandated to the county agencies. It is inefficient for the counties to have multiple sets of requirements on the same type of task or action. There are several specific areas where alignment should occur, though this is not an exhaustive list.

General Administrative Requirements

1. Management evaluations – Structure, frequency, duration, sample of cases, report, and follow-up requirements
2. Quality assurance requirements – Sample (including multiple programs), reporting requirements to the state, required forms to be used, frequency
3. Reports – detail provided in reports should be the same across all program areas and in the same format

State Quality Assurance/Quality Control Processes

The state should align the state quality assurance/quality control process and elements that are reviewed, as possible based on federal regulations. There are certain elements that are common regardless of the program, such as household composition and income. However, each program area reviews cases using a different tool, looking at different elements, how to classify the items (case error, payment error, etc.), and reports out on those findings differently. This makes it hard for the counties and the state to take a more unified approach to solving accuracy challenges

Additional Opportunities

Additional Opportunities

The following are additional opportunities that were identified that would help Colorado in its administration of public and medical assistance programs. Through prioritization, they did not rise to the top as key recommendations or quick wins.

#	Opportunity
1	Update the current tracking and identification of expedited applications for SNAP.
2	Develop standardized performance expectations for worker productivity that take into consideration the differences of county size.
3	Establish a directory of eligibility workers who are fluent in languages other than English and route work to these staff as possible.
4	Assess how to broaden the existing outreach network to include additional programs and responsibilities so as to reduce work on the counties.
5	Develop an online statewide resource guide.
6	Explore methods to simplify the ways in which a client can provide their documents to the county more easily.
7	Utilize the upcoming CBMS re-procurement to identify and advocate for changes that will help improve overall functionality to the system.
8	Perform an assessment of the current interfaces into CBMS.
9	Create a statewide appointment scheduling system that all counties and clients can use to schedule and reschedule their appointments.
10	Develop a training for all eligibility worker supervisors that orients them to the role of a supervisor.
11	Create and administer an annual workforce and county operations survey.

Appendix

Recommendation 3: Sample Customized Positions

Sub-recommendation 2 suggests that the state create a series of job descriptions that improve career ladders and recognize unique skillsets. These sample customized positions, and their corresponding pay adjustments, could also be layered on top of one another. For example, a county could have a senior onsite eligibility worker with translation skills. This person would focus on complex cases for in person applicants who speak the worker's second language.

Senior Eligibility Worker

- A promotional classification for an eligibility worker who has demonstrated strong performance and is able to successfully work the most complex programs and cases.
- This role also helps to mentor newer eligibility workers, similar to the "lead worker" role that exists in some, but not all, counties.

Onsite Eligibility Worker

- This would be an employee whose primary work location would be in the local county office.
- These employees would conduct interviews with walk-in clients and assist clients with in-office application completion.
- This approach could increase employee satisfaction by having people self-select into an in-office role.

Remote Eligibility Worker

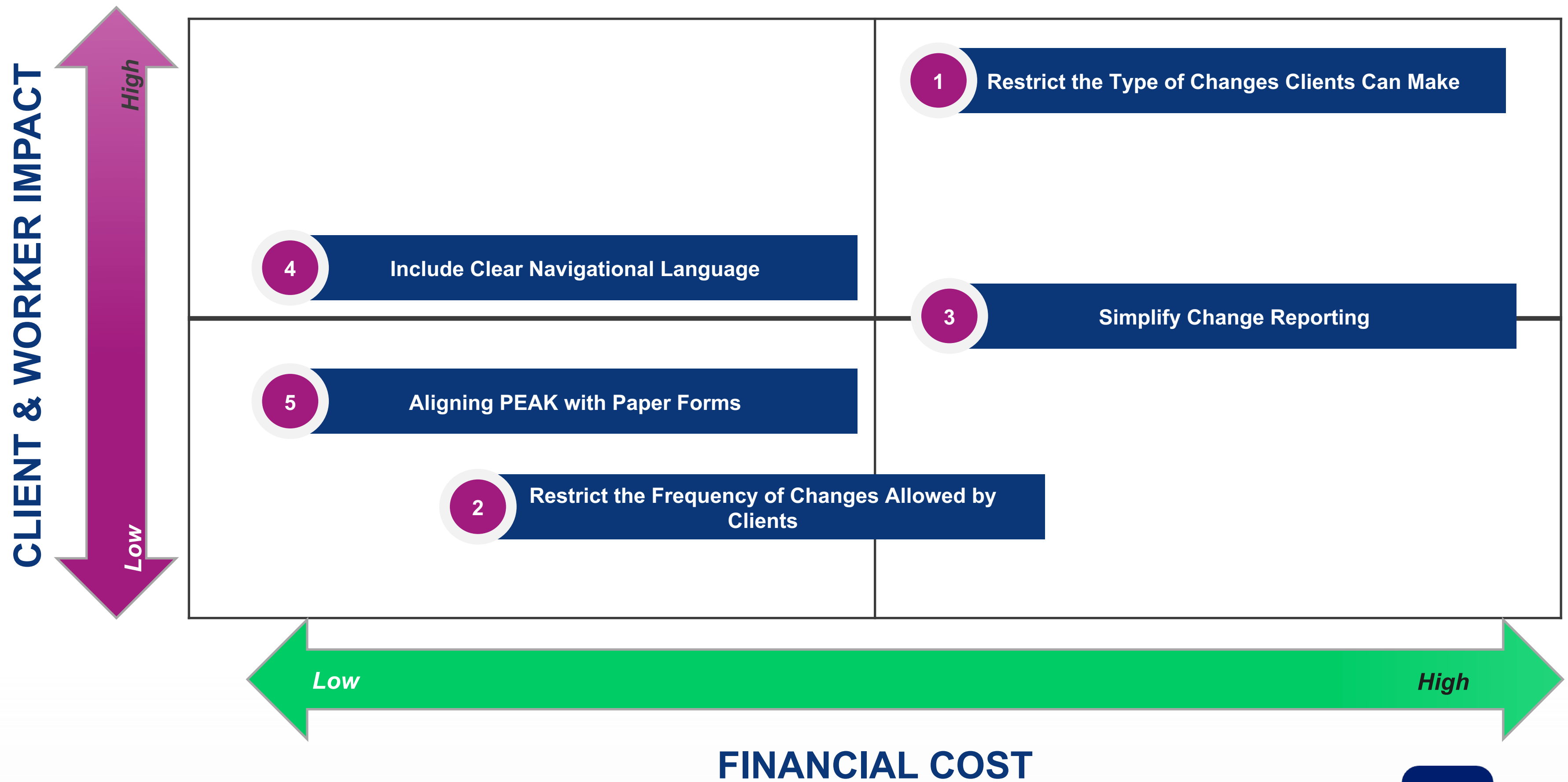
- This would be an employees whose primary work location is their home.
- They would work on applications virtually and would rarely be in the office. They may even live a considerable distance away.
- Creating distinct positions based on duty locations may help avoid conflicts with county-level telework policies.

Eligibility Worker with Translation Skills

- This is an employee who is either a native or fully proficient speaker of a language other than English that is spoken in Colorado.
- These employees would first be assigned to cases with applicants who speak that language.
- Counties would have a directory of these employees for assisting applicants, significantly reducing the cost of an outside translation contract.

Recommendation 4: Optimize PEAK Impact/Cost Matrix

Recommendations for PEAK may be prioritized several ways, including **weighing the intersection of cost and impact**. High impact features are ones which improve workflow efficiency and client experience. Low-cost features are ones which require fewer hours by web developers. Based on this analysis, low cost and high impact changes such as adding clear navigational language and aligning digital and paper forms are changes that should be prioritized.



PUBLIC™
CONSULTING GROUP

Solutions that Matter