

Unlocking Access Through Data Sharing: The Policy Power of Proactive Categorical Eligibility

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ABSTRACT

Energy affordability programs are constrained by two linked limits: funding and enrollment. These affordability programs often struggle to reach eligible households because eligibility and identity data are fragmented across agencies and utilities, and because verification requirements place high administrative burdens on both households and program administrators. Proactive categorical eligibility — automatically qualifying households already verified by other public programs (e.g., SNAP, Medicaid, WIC) — offers a policy and operational pathway to permanently improve access while strengthening fiscal integrity and system durability.

This paper presents a replicable implementation method for cross-agency data sharing and privacy-safe data matching that enables proactive categorical eligibility at scale across heterogeneous utility environments (investor-owned utilities, municipal utilities, and electric cooperatives). It is important to uplift the program-agnostic relevance of this paper's contribution. This paper describes a theory of change linking comprehensive, audit-ready data sharing to measurable outcomes (sustained high enrollment, lower administrative overhead, improved equity, and stronger auditability), outline the governance and interoperability conditions required for replication, and propose a standard metrics framework to evaluate ongoing performance and reconciliation. Case evidence from a statewide program in Washington demonstrates that modernized data-matching and delivery infrastructure can credit large volumes of assistance to qualified accounts while producing an auditable ledger that confirms every dollar delivered. The paper concludes with policy recommendations for state agencies, utilities, and regulators to institutionalize categorical eligibility through standardized data-sharing agreements, aligned evidence standards, robust operational governance, and audit-ready reporting.

Introduction

Energy affordability represents a persistent policy challenge at federal, state, and municipal levels. Despite the availability of public funds, a substantial enrollment gap persists, primarily because benefit distribution remains dependent upon fragmented, household-initiated application processes. The administration of public benefits currently stands at a critical juncture, necessitated by the transition from legacy, document-heavy verification protocols toward agile, data-centric models. Proactive categorical eligibility (CE)—defined as the systematic, automated qualification of households already verified by adjacent public programs such as the Supplemental Nutrition Assistance Program (SNAP) or Medicaid—reframes benefit delivery from an outreach challenge to an operational design problem.

This operational shift aligns with broader trends in utility grid modernization. The interoperability frameworks required for income verification and the infrastructure necessary for grid-level transparency exhibit structural similarities, permitting state agencies to leverage shared governance and technical standards across both domains. This paper examines the theoretical

foundations of CE and analyzes the operational mechanics of the "verification cascade." Furthermore, this research identifies the persistent legal and administrative barriers, such as restrictive verification mandates, that impede automation, and provides quantitative evidence regarding the administrative cost-savings inherent in data-centric delivery models.

Background and Methodology

The theoretical framework for categorical eligibility (CE) is situated at the intersection of nudge theory and the study of administrative burden. Existing research consistently posits that low-income populations face significant "sludge"—defined as transactional friction and documentation hurdles—which precipitates procedural disenrollment (Kenney et al. 2010). To address this, this study employs a comparative case study methodology, selected for its utility in analyzing complex, real-world policy implementations across disparate institutional environments.

This analysis synthesizes operational findings from three pivotal landmarks: Louisiana's implementation of Express Lane Eligibility (ELE), Washington State's utility assistance modernization, and recent grid-transparency frameworks from the California Public Utilities Commission (CPUC) and the New York Public Service Commission (NYPSC). These cases were selected specifically to provide empirical evidence regarding the resolution of legal barriers to automated data sharing and to quantify the fiscal impacts of administrative modernization. By analyzing administrative performance indicators, including caseworker touch time and application processing latency (Dorn, Wilkinson, and Benatar 2014), the impacts of administrative friction are isolated. This methodology identifies the "verification cascade"—a structured hierarchy of automated data matching—as the critical mechanism for the operationalization of "trusted facts" and the institutionalization of fiscal integrity across heterogeneous utility environments.

The Problem: Structural Constraints and Policy Bottlenecks

Public administrators and utilities confront three structural constraints when scaling energy affordability programs. First, data governance is heavily fragmented; while siloed architectures aim to protect privacy, they simultaneously prevent the use of verified eligibility evidence to deliver benefits proactively. Second, utility implementers are highly heterogeneous. States typically oversee a diverse mix of investor-owned utilities, municipal utilities, and electric cooperatives, each maintaining distinct customer information systems (CIS) and varying IT capacities. Third, oversight pressure is intensifying. Regulators increasingly demand high-fidelity evidence that funds have reached eligible households and that administrative costs are optimized.

The path to automation is frequently obstructed by legacy legal and administrative barriers. In Washington State, for example, WAC 388-470-0005 mandates the manual review of "legally unavailable" resources—information that remains artificially siloed outside the reach of automated data hubs (Washington Administrative Code 2024). Such regulations impose a structural "pause" in digital workflows, necessitating a reversion to document-heavy verification protocols. These structural bottlenecks create regressive equity impacts, as the "sludge" of manual verification disproportionately burdens households with unstable employment or informal income.

The evidence for transitioning to data-centric models is significant. Administrative performance data indicates that modernization yields dramatic fiscal returns. Alabama realized \$1.1 million in annual administrative savings (Mathematica 2012, 12) through the automation of its renewal phase (Mathematica Policy Research 2012). Similarly, Iowa compressed Medicaid processing times from 40 minutes to 12 minutes per case (Mathematica 2012, 14) through the elimination of manual documentation hurdles (Mathematica Policy Research 2012). By reframing delivery as a problem of data governance, agencies can recapture these administrative costs and redirect them toward direct assistance.

The Failure of the "Add-on" Paradigm

The structural constraints identified—governance fragmentation, utility heterogeneity, and regulatory pressure—are frequently exacerbated by the prevailing tendency to treat categorical eligibility as an administrative "add-on" rather than a foundational delivery system. When implemented as a peripheral layer, categorical eligibility inevitably produces systemic failure modes. First, the lack of a standardized reconciliation ledger creates a "trust gap," where auditors cannot trace eligibility determinations, leading to eventual program retrenchment. Second, treatment as an add-on results in the accumulation of unresolved exceptions, as standard operating procedures often lack dedicated error-correction channels for automated data mismatches. Finally, this approach fails to reconcile eligibility criteria across programs, resulting in "eligibility drift" where households verified by one program are treated inconsistently in another. These modes of failure demonstrate that without transitioning to a full, data-centric delivery system, categorical eligibility remains a fragile, high-risk intervention rather than a scalable policy tool.

Theory of Change

The theory of change for proactive categorical eligibility posits that by establishing comprehensive, audit-ready data sharing, measurable outcomes can be achieved, including sustained high enrollment, lower administrative overhead, improved equity, and stronger auditability. This framework links the technical infrastructure of data matching to the ultimate policy goals of efficient and equitable benefit distribution.

Alternative Policy Design: Proactive Categorical Eligibility

Categorical eligibility serves as a policy mechanism wherein participation in an income-qualified public program is accepted as definitive evidence of eligibility for energy assistance. Proactive categorical eligibility extends this concept beyond customer self-attestation by utilizing secure record-matching to identify eligible households, facilitating either automated enrollment or the pre-population of eligibility fields. In the most robust implementations, benefits are delivered without the requirement of a formal application, thereby eliminating the most significant administrative barrier to program participation.

Manual categorical eligibility. This model necessitates that applicants provide documentary proof, which agency staff subsequently verify.

Assisted categorical eligibility. This model permits applicants to authorize staff to verify eligibility directly through online channels or file matching.

Proactive categorical eligibility. The third and most efficient model, proactive categorical eligibility, involves record matching to automatically enroll households or issue credits, thereby removing the initial application—the highest-friction stage of the process. This model’s efficiency is derived from three structural advantages. First, it eliminates administrative friction by utilizing existing eligibility records from adjacent programs, thereby removing the requirement for customer self-attestation or documentation submission. Second, it leverages the "verification cascade"—a hierarchical, automated framework—to enable high-confidence, near-real-time data matching that bypasses legacy batch-processing limitations. Third, it removes the "document tax" by automating the validation process via AI-enabled "Extract, Load, Transform" (ELT) pipelines, shifting the administrative burden from human caseworkers to secure, automated systems, which optimizes capacity for large-scale, time-sensitive implementation.

Modernizing Verification: The Role of AI and Secure Infrastructure

The scalability of proactive categorical eligibility relies on the modern "verification cascade"—the process of validating and matching datasets across disparate entities. Emerging technical frameworks, such as "Extract, Load, Transform" (ELT) pipelines utilizing secure, cloud-based data environments, allow for high-confidence, near-real-time matching. By leveraging AI-enabled entity resolution within secure servers, utilities can automate the verification of vast datasets without the need for manual review. This technical evolution—shifting from legacy batch processing to in-memory ELT pipelines—is the mechanism that makes the "verification cascade" economically feasible, compressing timelines from months to days while simultaneously improving data security. The "document tax" is effectively removed by automating the validation process via AI-enabled ELT pipelines, shifting the administrative burden from human caseworkers to secure, automated systems.

Implementation Method

The successful implementation of proactive categorical eligibility requires a hierarchical, risk-based operational framework structured across four critical phases. Before initiating these phases, administrators must establish foundational policy and operational building blocks—such as defined data-sharing agreements, clear consent architecture, and exception-handling protocols—to ensure system durability. Table 1 summarizes the essential building blocks and common failure modes that arise when categorical eligibility is treated as an ad hoc intervention rather than a foundational delivery system.

Table 1. Policy and operational building blocks for proactive categorical eligibility

Layer	What must be true	Common failure modes
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Policy authority	Program rules explicitly allow categorical pathways and define qualifying programs, income thresholds, and recertification cadence.	Eligibility criteria differ across programs and are not reconciled. Categorical pathways remain optional and underused.
Privacy and consent	Data use is authorized and communicated clearly to households. Consent and opt-out mechanisms are defined.	Agencies delay implementation due to unclear consent language or inconsistent interpretations of privacy constraints.
Data governance	Data owners agree on permitted fields, refresh frequency, retention, and audit responsibilities.	Agreements cover data access but not operational responsibilities such as dispute handling and error correction.
Utility account matching	Eligibility records can be linked to utility accounts through reliable identifiers such as service address and account metadata.	High mismatch rates due to address quality, name variation, or multi-family account structures. This drives manual rework.
Operations and workflow	Enrollment files are delivered on a predictable cadence with exception handling and customer support channels.	Enrollment is treated as a one-time batch. Exceptions accumulate and erode trust in the system.
Compliance and audit	Every determination is traceable. Systems log inputs, matching logic, and outputs in an audit-ready format.	Programs cannot demonstrate how eligibility was determined. Audits require re-creation of decisions and slow future scaling.

Source: Compiled by the authors based on categorical eligibility implementation standards, 2026.

Following the establishment of these prerequisites, the operational execution proceeds through the following phases:

Phase 1: Matching and Eligibility Identification

The process begins by translating verified participation in public programs (e.g., SNAP, WIC, Medicaid) into a portable eligibility signal. Agencies must first establish data-sharing agreements (DSAs) that clearly define the lawful purpose of the exchange, minimum necessary data elements, and strict access controls. Once the legal framework is established, the utility customer file is ingested on a recurring cadence. Utilizing AI-enabled entity resolution, the system standardizes fields and performs probabilistic matching to link eligibility records with

utility accounts. This approach significantly reduces the equity gap by accounting for local naming conventions and address formats that often cause "false negatives" in manual systems, ensuring that participation rates do not inadvertently drop for households with complex identity profiles.

Phase 2: Messaging, Consent, and Engagement

Following identification, the workflow shifts to securing consent and engaging the household. This phase prioritizes "choice architecture," where a proactive outreach model—typically executed through SMS or direct mail—informs the household of their eligibility status without imposing administrative burden. The messaging must be accessible, utilizing plain language and multilingual channels to build trust. By ensuring that the consent mechanism is clear, revocable, and purpose-limited, agencies can preserve the household's agency while converting eligibility matches into successful benefit delivery.

Phase 3: Delivery and Benefit Issuance

Once consent is captured, the focus moves to delivery. This phase requires tight coordination with utility Customer Information Systems (CIS) to credit benefits directly to customer accounts. To manage the heterogeneity of utility environments, the system must employ standardized interfaces that handle diverse CIS structures, varying account formats, and differing IT capacities. By maintaining a strict separation between eligibility identification (the "trusted fact") and delivery execution (the "financial transaction"), the system ensures operational flexibility. This modularity allows for the rapid, secure issuance of bill credits at scale, as demonstrated in statewide programs where reconciliation confirmed delivery to qualified accounts in less than three months.

Phase 4: Accountability and Audit Readiness

The final and most critical phase is the creation of an auditable ledger. Accountability is not an administrative afterthought; it is the trust contract that sustains political and regulatory support. The implementation method requires the production of a continuous, trace-ready ledger that documents each funding decision, the eligibility basis, the delivery action, and any exceptions. By utilizing AI to flag anomalies before credits are posted, the system enables continuous human-in-the-loop auditing. This proactive oversight transforms the program's fiscal integrity, providing regulators with the necessary assurance that every dollar has reached its intended recipient, thereby mitigating the risk of backlash associated with fraud or program mismanagement.

Case Evidence: Operationalizing Comprehensive Categorical Eligibility

The following case evidence demonstrates that proactive categorical eligibility is not a theoretical construct, but a proven operational reality that delivers on the promise of comprehensive, equitable, and fiscally sound assistance. Operational reality validates the efficacy of proactive CE. Evidence across three distinct jurisdictions confirms that a durable,

audit-ready data-sharing infrastructure can accommodate heterogeneity in program structure and utility type.

Washington State (Energy Bill Credits). A statewide initiative required rapid implementation across dozens of utilities with unique technical requirements. Supported by the Climate Commitment Act, the Washington Families Clean Energy Credits (WFCEC) program credited \$150 million to over 690,000 households—approximately 20% of all residential electricity customers—in less than 100 days (Washington State Department of Commerce 2026; Washington Families Clean Energy Credits Grant Program 2024).

Maryland (OHEP and MDTHINK Integration). Maryland’s modernization of its Office of Home Energy Programs (OHEP) provides a blueprint for leveraging integrated data systems. By integrating the OHEP data management system with the MDTHINK Eligibility and Enrollment (E&E) system, the state enabled automatic enrollment for categorically eligible households. This integration facilitated a record number of applications in State Fiscal Year 2024, successfully serving 94,205 households through heating assistance (Maryland Department of Human Services 2024).

New Jersey (AWCF WIC Pilot). The American Water Charitable Foundation (AWCF) pilot in New Jersey demonstrates the replicability of the model for programs utilizing novel categorical rosters. By securely integrating the Women, Infants, and Children (WIC) program roster, the pilot distributed \$250,000 in one-time \$200 grants to 1,250 households in Camden County (New Jersey Department of Health 2026; PR Newswire 2026). The program achieved 100% fund delivery within one month across major utility providers, proving the model’s technical interoperability.

The scale and comparative outcomes of these initiatives, as detailed in Table 2, are synthesized from the Washington State Department of Commerce (2026, 3), the Maryland Department of Human Services (2024, 12), and the New Jersey Department of Health (2026).

Table 2. Case study summary of scale and reported outcomes

Program	Jurisdiction	Scale	Categorical eligibility approach	Reported outcomes
WFCEC bill credits	WA	\$150M, \$200 one-time credit; 60 utilities	Proactive matching plus application backstop	690,000 households received credits; >75% via categorical eligibility without applying.
Statewide LIHEAP modernization	MD	Dozens of local agencies; statewide platform	Automatic relief via categorical eligibility plus standard application	>90,000 households received >\$98M without an additional application; additional households served via application pathway.

LIHWAP modernization	MD	Dozens of subgrantee agencies	Workflow redesign with data matching across state and utility systems	Processing time -75%; completed applications +260%; overhead reported from ~40% to ~6%.
EEAP income verification pilot	NY	9 utilities; ~1.5M eligible households	Income verification waterfall beginning with categorical eligibility	Planning estimate: ~40% verified categorically.
SNAP document verification modernization	MS	Statewide SNAP workflow	Structured document intake and automated checks	Manual review time - 60%; processing time - 75%; first-pass correct docs 87%.
Charitable Pilot	NJ	1,271 households enrolled; \$235,500 in awards	Proactive WIC data matching	Exceeded enrollment goal of 1,250; 100% of funds delivered within 1 month across multiple utilities.

Source: Compiled from WSDC (2026); MD-DHS (2024); NJDOH (2026).

Replication and Interoperability

For energy affordability programs to achieve state-level scale, interoperability must be treated as a fundamental design requirement rather than an operational afterthought. The core challenge in replicating proactive categorical eligibility lies in managing the diverse IT landscapes of utility providers—ranging from large-scale investor-owned utilities (IOUs) to smaller municipal systems and electric cooperatives. To ensure sustainability, an architectural framework is proposed that bifurcates the system into an invariant governance core and an adaptive technical layer.

The Consistent Core: Invariant Requirements

Regardless of the utility type, specific "Invariant" elements must remain standardized to maintain programmatic integrity and auditability. These elements function as the non-negotiable governance core of the delivery system. Central to this is a minimum data schema that establishes a unified language for matching and reporting, which is essential for consistent policy execution across different service territories. Furthermore, the system must utilize a matching approach that is inherently resilient to the data quality issues common in social service records, such as address discrepancies or name variations.

Accountability represents the final pillar of this invariant core. Because these programs operate in a highly scrutinized regulatory environment, the reconciliation ledger structure and audit controls must be identical across all implementations. By standardizing the consent-based outreach pattern and ensuring the delivery model—including standardized interfaces for account

crediting—remains uniform, agencies create a repeatable "trusted fact" loop that satisfies both utility legal departments and state oversight bodies.

The Adaptive Layer: Technical Heterogeneity

Conversely, the "Variable" or adaptive layer of the implementation must flex to accommodate local context. This layer addresses the technical heterogeneity inherent in utility operations, such as varying file cadences and formats (e.g., daily API-based exchanges versus monthly batch CSV extracts) and the differing levels of available identifiers—such as whether a system relies on full customer accounts or only address-based matching. Utilities also possess widely different IT capacities and Customer Information System (CIS) constraints. The adaptive layer ensures that the policy mechanism is not rigid, allowing the implementation to meet each utility where it is currently positioned on the digital maturity spectrum.

Table 3 illustrates this interoperability footprint, contrasting the required consistency of the governance core against the operational and technical realities that necessitate an adaptive approach.

Table 3: The interoperability footprint: Invariant policy core versus variable implementation

Policy / Technical Dimension	Invariant Requirements (The Consistent Core)	Variable Implementation (The Adaptive Layer)
Operational Basis	Minimum data schema; standardized account crediting	Varies by CIS architecture (IOU vs. Muni vs. Coop)
Matching Logic	Deterministic and probabilistic match standards	Adapts to data quality; unique identifier availability
Data Governance	Standardized reconciliation ledger; audit logs	Variable file cadence (daily/weekly/monthly)
System Capacity	Consistent consent disclosure/outreach model	Tailored to internal IT capacity and vendor constraints

Source: Data compiled from Mathematica Policy Research (2012), Dorn, Wilkinson, and Benatar (2014), and internal program audits, 2026.

By separating these components, administrators can successfully treat "interoperability" as a design requirement. This structural bifurcation ensures that the system remains durable enough to pass rigorous audits while remaining flexible enough to deploy across the varied, heterogeneous utility landscape.

Synergies with Grid Modernization Initiatives

The operational modernization required for proactive categorical eligibility, while focused primarily on benefit delivery, offers significant synergies with the broader data-driven decarbonization of the utility landscape. Recent assessments of grid modernization—specifically

findings from the California Public Utilities Commission (CPUC) and the New York Public Service Commission (NYPSC)—reveal that the same regulatory and technical friction throttling social safety net enrollment also prevents the transparent deployment of distributed energy resources (DERs) (Berkeley Law 2021).

Whether an agency seeks to verify a household's income or analyze a neighborhood's peak load, administrators encounter the same "regulatory schism" between ambitious state policy goals and the antiquated operational frameworks of utility providers. Barriers such as the CPUC's "15/15 rule" for data aggregation and restrictive interpretations of Critical Energy/Electric Infrastructure Information (CEII) parallel the legal "sludge" observed in social service verification, such as WAC 388-470-0005 (Washington Administrative Code 2024). In both domains, these privacy-by-silo approaches hinder the "single source of truth" required for efficient operations. By standardizing data-sharing infrastructure for categorical eligibility, utilities create the technical pathways necessary for broader grid transparency, effectively eliminating the "Ratepayer Tax"—the hidden cost of manual data translation passed on to consumers.

Policy Implications and Recommendations

To institutionalize proactive categorical eligibility as a durable policy tool, administrators and regulators must move beyond ad hoc data-sharing efforts. The following recommendations establish a policy-to-outcome framework designed to minimize administrative friction and maximize fiscal integrity.

Standardize data-sharing agreements to overcome regulatory silos. Legal ambiguity is a primary barrier to automation. Agencies must adopt standardized DSA templates that define "permitted purpose" clauses explicitly authorizing verification for categorical eligibility. Implement agreements that mandate data exchange for benefit qualification, preempting "privacy-by-silo" interpretations. As seen in Washington, where WAC 388-470-0005 creates manual friction, standardized legal frameworks must supersede manual review requirements by recognizing automated data matches as primary evidence (Washington Administrative Code 2024).

Mandate interoperability standards to address technical heterogeneity. Utilities possess diverse CIS and IT capacities, often preventing scalable implementation. Regulators should mandate a "minimum data schema" and predictable file cadences across all service territories. By decoupling the "Invariant Governance Core" (the logic of eligibility) from the "Adaptive Technical Layer" (the utility-specific file format), programs can achieve scale without requiring uniform utility infrastructure.

Optimize consent architecture to mitigate enrollment churn. Behavioral insights demonstrate that "Opt-In" models act as a significant barrier to participation. Evidence from Louisiana's implementation showed a 62 percent reduction in monthly enrollment when the program shifted from automatic enrollment to an opt-in requirement (Dorn, Wilkinson, and Benatar 2014). Adopt "Opt-Out" or default-enrollment models. Programs should provide clear, plain-language disclosures that explain data usage while minimizing the steps required for a household to authorize the delivery of benefits.

Institutionalize reconciliation as essential infrastructure. Lack of audit-ready data is a frequent barrier to political support. Require a standardized reconciliation package—including eligibility basis, delivery confirmation, and anomaly resolution logs—as a mandatory program KPI. Utilizing AI to flag exceptions before credits post builds the high-fidelity evidence required to satisfy auditors and sustain long-term program funding.

Adopt a cost-equity framework to eliminate the "ratepayer tax." Relying on manual verification imposes a regressive administrative burden—the "Ratepayer Tax"—which is passed on to consumers. Transitioning to automated verification is an equity imperative. By eliminating the manual translation of data, programs can recapture these administrative costs—such as the \$1.1 million annual savings observed in Alabama's automated renewal phase—and redirect them into direct assistance (Mathematica Policy Research 2012).

Table 4 summarizes the primary barriers identified in this analysis, pairing each with the recommended policy intervention and the underlying cause

Table 4: Summary of policy recommendations and barriers

Barrier	Persistence/Cause	Recommendations
Legal/Regulatory Silos	Agencies cite privacy laws to block data sharing.	Standardize DSAs: Draft DSAs with "Permitted Purpose" clauses that explicitly allow verification for categorical eligibility.
Manual Friction	"Legally unavailable" resource requirements (e.g., WAC 388-470-0005).	Policy Alignment: Mandate that automated matches supersede manual paper verification.
Utility Heterogeneity	Utilities have different CIS/IT systems.	Interoperability Standards: Require a "Minimum Data Schema." Decouple the "Invariant Governance Core" from the "Adaptive Technical Layer."

Administrative Cost	Legacy, manual processing ("Ratepayer Tax").	Automated Ledger: Implement an auditable, continuous ledger. Use AI to flag anomalies before credits post.
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Source: Compiled by the authors based on categorical eligibility implementation standards, 2026.

Limitations and Conclusion

This research provides a framework based on implementation evidence, but several limitations suggest directions for future inquiry. Future inquiry should focus on counterfactual analysis, granular equity measures for complex identity profiles, and the development of shared performance benchmarks. While successful case studies are abundant, rigorous research is needed to compare outcomes against counterfactual enrollment approaches across varying utility contexts to isolate the impact of automation. In addition, future studies must quantify equity impacts with more granular subgroup measures to ensure automated matching systems do not systematically exclude households with complex or non-standard identity profiles. Lastly, there is a critical need for a shared evaluation dataset. Creating a benchmark for administrative burden and reconciliation performance across states would allow for cross-jurisdictional learning.

Proactive categorical eligibility represents a fundamental policy shift that realigns income verification with modern operational capabilities. The transition from legacy, document-heavy protocols to the "Verification Cascade" provides the only viable path to achieving both fiscal integrity and administrative scale. By standardizing DSAs, prioritizing default-enrollment models, and treating reconciliation as a pillar of system design, states can institutionalize a durable, automated infrastructure. Ultimately, shifting to a data-centric model allows public programs to transcend the "Ratepayer Tax" of operational inefficiency, ensuring that public assistance reaches eligible households efficiently and equitably.

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