

ARTICLE

H.R. 1 in Practice

What Heightened Oversight Can Mean for Government Eligibility Programs



Federal oversight of public assistance programs is intensifying. With the passage of H.R. 1, expectations around eligibility accuracy, documentation, and funding accountability are becoming more explicit—particularly for Supplemental Nutrition Assistance Program (SNAP), Medicaid, and other Health and Human Services (HHS) programs.

While the legislation does not introduce new responsibilities, it does reinforce the need for agencies to demonstrate that eligibility decisions are defensible, measurable, and supported by strong verification practices. To better understand what this means operationally, **Amanda D'Amico, Senior Director of Market Planning, Government Efficiency & Fraud Solutions at LexisNexis® Risk Solutions**, reviews how agencies can navigate increased scrutiny while balancing oversight and access for eligible households.



H.R. 1 has raised the profile of eligibility oversight across SNAP, Medicaid, and HHS programs. What is changing for agencies on the ground?

Amanda D'Amico:

While responsibility for eligibility oversight of these programs remains the same, government tolerance of associated weak verification and documentation processes is changing. Eligibility accuracy and improper payments have always mattered, but H.R. 1 reinforces that these requirements are no longer background metrics.

Payment Error Rates (PERs), eligibility documentation, and verification practices are now direct indicators of funding risk and program credibility, not just compliance reports reviewed during audits. PERs can be influenced by a consistent set of eligibility factors—income, shelter, household composition, and assets. When changes in these areas are incomplete, outdated, or inconsistently validated, PER exposure can increase even when staff are following policy.

For agencies, that can create real operational pressure. Agency leaders are being asked not just whether eligibility was verified, but how defensible those decisions can be when scrutinized later. That change is a shift from policy interpretation to operational proof.



Improper payments are often associated with fraud, but in practice the underlying drivers are more complex. How should agencies think about risk?

D'Amico:

That nuance is critical. Improper payments are often the result of structural design choices rather than isolated fraud events, especially in programs that rely on simplified or periodic reporting to reduce administrative burden. By design, those models can tolerate a degree of data staleness between reporting events.

Under simplified reporting, households are not required to report every change immediately. As a result, eligibility determinations can quietly drift out of alignment as people move, rent changes, utilities shift, or household composition evolves between certification or recertification points. None of this requires bad intent. Documentation gaps, outdated household information, and timing mismatches can accumulate incrementally, increasing exposure over time.

Focusing exclusively on intake accuracy can miss the real risk. Eligibility is dynamic, but verification models are often episodic. Programs built around static checkpoints can struggle to keep pace in high-cost, high-volatility environments. Over time, this can create misalignment between policy and execution—where payment issues stem from structural constraints in the system, not improper intent by staff or participants.



Identity verification plays a major role in eligibility decisions. Where do traditional approaches fall short today?

D’Amico:

Document-based verification can confirm that a document exists, but it does not confirm that the identity behind the document is singular, stable, or consistent across systems. Duplicate identities, layered household relationships, and reused identifiers can pass surface-level checks, especially as identity misuse becomes more sophisticated.

The more productive question for agencies is no longer, “Did we check their identification?” The question now is: “How confident are we in this identity across time and programs?” That distinction will matter more as federal scrutiny increases.



Many programs rely on self-attestation to balance access and efficiency. Is that model sustainable under H.R. 1?

D’Amico:

Self-attestation remains operationally necessary. The issue is not necessarily trust, instead the issue can become determining the proper balance between self-attestation and independent validation. PER exposure increases. In SNAP programs specifically, the most common drivers behind PERs continue to be income verification, shelter expenses, household composition changes, and asset verification—areas where household circumstances can shift between certification events.

H.R. 1 reinforces the agency requirement for improved layering, using independent data or greater clarity, without increasing documentation burden for applicants. When properly implemented, this process can strengthen defensibility while preserving access.



What does a modern eligibility oversight framework look like in practice?

D’Amico:

Effective risk management approaches often emphasize stronger identity confidence, the use of multiple independent data sources, ongoing oversight, and risk-based segmentation. These approaches allow agencies to focus attention where indicators suggest higher risk, rather than applying uniform treatment across all cases.

Automation can support this approach by helping agencies validate key eligibility factors more consistently and efficiently. By reducing reliance on manual, point in time checks, automation can allow staff to focus attention where it is needed—and minimize friction for eligible households.

This approach can help low-risk households move through the process more efficiently, while higher-risk cases receive appropriate attention. Precision can protect both funding and program accessibility.



What should program leaders prioritize now to prepare for heightened oversight?

D'Amico:

Agency leaders should start by asking practical questions, such as: Where do we rely most heavily on self-attestation? How do we measure identity confidence beyond documents? What visibility do we have between recertifications?

The goal is not necessarily stricter eligibility—instead it is more defensible eligibility. Agencies that can clearly explain, document, and support their decisions will be better positioned as oversight expectations continue to rise.



Looking Ahead

H.R. 1 represents more than a compliance mandate. It signals a broader shift toward transparency, accountability, and operational resilience in public assistance programs. Greater visibility into income, shelter, household composition, and assets, and the ability to support those factors efficiently, will play a growing role in how agencies demonstrate defensible eligibility decisions under heightened oversight.

For agency leaders, a challenge—and an opportunity—is to modernize eligibility oversight in a manner that can withstand scrutiny, while continuing to serve eligible households efficiently and equitably.

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