

Administrative Burdens in SNAP: Disparate Impacts and Policy Solutions

Zev Ravin

INTRODUCTION

The Supplemental Nutrition Assistance Program (SNAP) serves as a central component of the American social safety net, providing monthly food benefits to more than 40 million low-income individuals each year. Despite its broad reach, non-participation among eligible individuals remains widespread, driven by factors including lack of awareness, stigma, and logistical barriers. SNAP's administrative burdens do not fall equally across the eligible population. The same procedures impose different costs on different people depending on their circumstances, and for three groups in particular, seniors, workers with unstable employment, and time-constrained families, those costs are disproportionate in distinct and specific ways. Drawing on research into the costs individuals face when interacting with government programs, the misalignment between what SNAP requires and what these groups are positioned to provide is not a coincidence. These patterns reflect deeper political and institutional dynamics that shape how program access is structured and for whose benefit. The paper concludes with targeted, state-tested reforms that would reduce these mismatches and improve equitable access.

POLICY OVERVIEW

SNAP is a federally funded program administered by individual states that provides monthly benefits to low-income households through

electronic benefit transfers that can be used to purchase eligible food items. Eligibility is based mainly on income, household size, and asset limits tied to the federal poverty line. To receive benefits, applicants must complete lengthy forms, provide documentation such as pay stubs or bank statements, participate in interviews, and meet ongoing reporting and recertification requirements.

These requirements are not equally burdensome for everyone. Applying for and maintaining SNAP benefits demands significant time, effort, and emotional energy, especially for people already facing financial instability. Although SNAP's overall participation rate among eligible individuals is often reported as relatively high, at about 83 percent nationally (USDA 2023), that figure conceals significant variation across demographic groups, with some eligible groups participating at rates far below the national average. Understanding those disparities requires examining how administrative procedures themselves can shape who is ultimately able to access public benefits, regardless of whether they legally qualify.

ADMINISTRATIVE BURDEN FRAMEWORK

Herd and Moynihan (2018) define administrative burdens as the "learning costs, compliance costs, and psychological costs" people face when interacting with government programs. Learning costs involve figuring out whether one

qualifies and how to apply. Compliance costs include the practical demands of participation: completing forms, gathering documents, attending interviews, and meeting reporting deadlines. Psychological costs refer to the stress, stigma, and loss of dignity that can come with applying for and using public assistance.

What makes this framework especially useful is its attention to distribution. Navigating government systems can depend on a person's access to resources such as education, internet, transportation, and flexible time - none of which are equally available. High administrative burdens, therefore, create a second layer of eligibility: not just who legally qualifies, but who can actually successfully navigate the process. In this sense, administrative design shapes outcomes even without explicit decisions about who should receive aid.

In SNAP, these dynamics have real consequences. Some eligible individuals are unaware they qualify; others find the application too difficult to complete or are deterred by other factors such as stigma. The result is that SNAP fails to reach specific segments of those it is designed to serve—and those segments are not distributed at random.

DISTRIBUTIONAL CONSEQUENCES

SNAP's standard administrative requirements, i.e., applications, interviews, documentation, and recertification, apply to all eligible participants on the surface. However the same set of procedures does not impose the same burden on everyone. Three groups illustrate, in distinct ways, how the program's design creates disproportionate obstacles: seniors, whose cognitive and physical limitations make standard procedures genuinely difficult to complete;

time-constrained families, who are capable of navigating the system but lack the hours to do so; and workers with unstable employment, who are capable and have the time, but face an additional layer of income-reporting requirements that other participants do not.

For seniors, the issue is capacity. Many older adults have limited internet access, reduced mobility, or cognitive challenges that make the standard tasks of SNAP participation—applications, interviews, documentation, and recertification—significantly more difficult to complete. Only about 42 percent of eligible seniors were enrolled in SNAP in 2022, compared to roughly 83 percent of the overall eligible population (AARP 2022). While seniors may not be the most food-insecure demographic group by proportion, those who do qualify face a system whose standard demands are disproportionately hard on them relative to their capacity (Negoita 2024).

For people with unstable or irregular employment, the issue is not capacity but rather additional requirements. Workers in this group are just as capable of navigating standard SNAP procedures as any other participant—the problem is that the program generates additional compliance demands specifically in response to income volatility. When earnings fluctuate, even modestly, a few extra hours one week or a brief gap between jobs, participants must report those changes and may face new verification requirements or benefit reductions as a result. These income-reporting rules produce high rates of benefit churn, causing many individuals to cycle on and off SNAP despite remaining continuously eligible (Golden and Rosenbaum 2022). As a result, paperwork-related issues lead

roughly one in eight working-age SNAP households to lose benefits they are entitled to each year (Urban Institute 2024). Ironically, these administrative burdens arise from the program's attempt to respond to the income instability that characterizes many recipients' lives.

For time-constrained families such as single parents, caregivers, and low-wage workers balancing multiple jobs, the issue is time, not ability. The difficulty is that gathering documentation, scheduling and attending interviews, and tracking recertification deadlines require hours that households managing full-time work and childcare with no margin for flexibility simply do not have. The result is that families who are entirely capable of participating in SNAP are effectively screened out by a process that assumes more flexibility than they actually have.

THE POLITICAL ROOTS OF ADMINISTRATIVE BURDEN

These patterns are not simply the result of bureaucratic inefficiency. They reflect a deeper tension between the stated goals of public assistance programs and the political conditions under which they are designed. SNAP is intended to reach all eligible households, yet its structure makes access systematically harder for some groups than others. Part of this can be explained by the program's low public visibility. When benefits are difficult to claim and procedures are opaque, citizens develop only a limited awareness of the government's role in supporting low-income households. That reduced visibility weakens pressure for reform. Programs that are hard to see are easy to burden further without provoking public backlash (Mettler 2011).

A second explanation involves the distribution of political influence. Research on American policymaking consistently finds that policy outcomes reflect the preferences of higher-income citizens far more closely than those of lower-income groups, and that this gap is especially pronounced on issues where the two diverge (Gilens 2012). SNAP is a clear case of that divergence. Higher-income Americans tend to prioritize fraud prevention and cost containment in means-tested programs, while recipients are more likely to prioritize accessibility and continuity of benefits. SNAP's strict verification rules and frequent reporting requirements map closely onto the first set of preferences and poorly onto the second. This is not because policymakers explicitly chose to disadvantage recipients, but because the preferences of those with the least political power carried the least weight when the program's administrative structure was being designed. The result is a compliance architecture that reflects whose voice tends to matter in American policymaking and whose does not.

Institutional incentives reinforce these patterns. Bureaucratic agencies and organizations involved in program administration have long supported stringent verification procedures as a way to demonstrate accountability and contain costs. Importantly, many of these decisions occur outside direct legislative debate. Restrictive procedures are often embedded in programs through administrative rules and regulatory practice rather than explicit statutory changes (Hacker and Pierson 2010). The result is that many burdens persist even when there is broad public support for SNAP itself, because the mechanisms producing them are technical, diffuse, and largely invisible to the public.

These dynamics make clear that SNAP's administrative burdens are political problems, shaped by whose preferences influence program design and whose costs are considered acceptable, and that reform must address those structural incentives, not just the paperwork itself.

POLICY RECOMMENDATIONS

Reducing SNAP's administrative burdens requires reforms targeting the specific barriers people can face, many of which have already been tested at the state level.

Extending certification periods, which determine how often households must renew their eligibility, directly reduces compliance costs. Alaska extended certifications from six to twelve months for most SNAP households in 2023 through an administrative change, meaning no new legislation required, and the move is credited with reducing burdens on families and caseworkers alike (Prenatal-to-3 Policy Impact Center 2023). For seniors and those with stable fixed incomes, even longer periods are appropriate. New York's Elderly Simplified Application Project (ESAP) offers the most developed model: eligible seniors receive a 36-month eligibility period, a simplified application, relaxed documentation requirements, and protection from losing benefits for failing to return interim paperwork on a fixed income. ESAP also partners with community organizations to help seniors apply and identify deductions that increase their benefit amounts, a necessary complement to procedural simplification, since paperwork reduction alone does not reach those who never apply (Hunger Solutions New York 2025).

Simplifying the application itself reduces learning and compliance costs simultaneously. California's partnership with Code for America produced GetCalFresh.org, a mobile-friendly platform that broke complex income questions into manageable steps and allowed document uploads by smartphone. The state's participation rate rose substantially following its launch, and because the tool guided users through income calculations step by step, it improved rather than compromised application accuracy, directly answering the integrity concerns opponents typically raise (CalMatters 2019). Massachusetts took a complementary approach by integrating SNAP and Medicaid applications: through its MassHealth/SNAP Application Supplement, individuals renewing Medicaid can simultaneously apply for SNAP through a streamlined process that transfers demographic data electronically between agencies (Massachusetts Department of Transitional Assistance 2022). For households likely to qualify for multiple programs, this eliminates redundant paperwork without requiring new eligibility determinations.

These reforms will face political resistance from critics who argue that simplification weakens program integrity. The evidence does not support that claim. Pandemic-era certification waivers produced no meaningful increase in error rates (USDA 2023), and technology-driven simplifications have generally improved accuracy. The right framing for advocates is straightforward: these changes are not about weakening SNAP, but about ensuring a widely supported program reaches the people it is designed to serve.

CONCLUSION

SNAP's administrative structure creates barriers that fall unevenly across the eligible population. The program's standard procedures are genuinely difficult for seniors to complete; its income-reporting rules generate extra compliance demands for workers with unstable employment; and its overall workload is more than time-constrained families can fit into their days. These are three different problems, but they share a common feature: the program's design fails to account for the circumstances of the people it is meant to serve. These failures are not accidental. They reflect political and institutional dynamics that shape whose preferences drive program design and whose burdens are treated as acceptable.

The evidence, however, shows these problems are not inevitable. New York's ESAP program, California's GetCalFresh platform, and Massachusetts's integrated enrollment system each demonstrate that burden reduction is achievable within the existing federal framework and that it improves rather than undermines program performance. The experiences of states that have already acted show that a more equitable SNAP is not only possible, but politically and administratively within reach.

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