

SNAP Work Requirements, Administrative Burden and Procedural Denials

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A common argument made against work requirements is that they impose significant administrative burdens, so eligible individuals will be unable to access benefits. Research finds that work requirements do have large disenrollment effects (Gray et al., 2022; Cook and East, 2025; Stacy, Scherpf and Jo, 2018; Vericker et al., 2023), but has been unable to empirically tease out administrative burden effects from other effects of work requirements that cause disenrollment, such as failing to meet the minimum hours of work threshold.

In this paper, we use a key signifier of administrative burdens—procedural denials—and test the hypothesis that work requirements reduce program receipt due to such burdens.¹ Specifically, we study the impact of work requirements for Able-Bodied Adults Without Dependents (ABAWDs) in the Supplemental Nutrition Assistance Program (SNAP). SNAP is currently the backbone of the U.S. social safety net, as it is the only broad-based program providing support for low-income households. Studying work requirements in SNAP is important both for understanding the impacts of the long-standing work requirements in this program, as well as to help gauge what to expect as SNAP work requirements are expanded due to the 2025 Budget Reconciliation Bill.

To identify effects, we exploit the fact that, in our sample period, only those below age 50 are subject to the ABAWD Work Requirements. We compare rates of procedural denials among SNAP applicants above and below age 50, using detailed administrative data. We also implement a placebo test and difference-in-differences model using a sample where the work requirements were waived regardless of age as a control group. We find that work requirements increase procedural denials and overall denials. We conclude these requirements impose meaningful administrative burdens that deter participation. From a policy perspective, our findings, when coupled with the findings that work requirements have little impact on work (Gray et al., 2022; Cook and East, 2025; Stacy, Scherpf and Jo, 2018; Vericker et al., 2023), suggest these policies do not achieve their stated goals.

I. Data and Institutional Setting

We take advantage of rich SNAP administrative data from a single state in the mountain-plains region—hereafter “the mountain-plains state”. Our sample period is 2012 to 2019 and we focus on new applicants who have not received SNAP in the six months prior to the focal application. For each application, we observe whether it was denied, and the reason it was denied.

A key measure of administrative burden is whether people are excluded from the program simply because it is too complicated or costly to complete the process required to receive benefits, rather than because they are not eligible for benefits (Giannella et al., 2024). This phenomenon is called a “procedural denial”. We define an application as receiving a procedural denial if the SNAP caseworker indicates the applicant is denied for the following reasons: not all information or supporting documentation was provided, or the required interview with the caseworker was missed. Note that those who are denied for failing to meet the work requirement are not flagged as a procedural denial.

We focus on whether the ABAWD Work Requirements increase procedural denials. While there are three work requirements in SNAP, the ABAWD Requirement has largely been the focus of the

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¹Administrative burdens include the costs associated with application, recertification, and participation in government benefit programs (Herd and Moynihan, 2018). This has similarly been conceptualized by economists as hassle costs or ordeals.

existing literature (Bauer and East, 2023). Able-Bodied Adults Without Dependents are defined as those who are working age, who are determined to be physically or mentally able to work, and do not claim a child or other qualifying adult as a dependent on their tax returns.² The Budget Reconciliation Bill passed in summer 2025 expands this work requirement to include many parents.

To meet this work requirement, individuals must work or participate in a qualified work program for at least 80 hours a month. Additionally, participants must prove to their caseworker every month that they are meeting this requirement, by providing documentation, such as pay stubs or letters from their employer. Individuals who are subject to the requirement can receive SNAP for 3 months in a 36 month time period without completing these activities. However, even during this 3 month window, individuals need to verify whether they are meeting the requirements, in order for their caseworker to know which months are countable towards their 3 month time limit. So, a new SNAP applicant must first verify whether they are subject to the work requirements, and, if they are subject to them, even if they are in the first 3 month window, they must provide documentation about whether they are complying with the work requirement.

We conceptualize the potential administrative burdens this work requirement imposes following the framework in Herd and Moynihan (2018) and Bauer and East (2023). Specifically, there are three types of potential burdens or costs: learning, compliance, and psychological. Learning costs include the time and energy needed to learn about the work requirements, how to comply with them, and whether one might meet the exemptions. Compliance costs include the costs of proving exemption, or the costs of proving compliance with the requirements for those not exempt, such as providing supporting documentation. Finally, psychological costs include stigma and other negative feelings associated with the work requirements.

For new applicants, these may increase procedural denials by making the application process more costly. Even for applicants who have not yet exhausted the 3 months they can receive SNAP without working, there are additional costs due to requiring individuals to determine whether they are subject to the work requirement and proving they are exempt.

In economic downturns, Congress often issues nationwide waivers of the ABAWD Work Requirements, and localities can apply for these waivers if their area is experiencing a downturn. In our sample period, there was a waiver in place through the end of 2012, due to the Great Recession. Work requirements will have less bite for individuals residing in places with a waiver, since these individuals are classified as exempt regardless of whether they meet the requirements and therefore do not need to complete the extra step of providing information about meeting the requirements. Additionally, a handful of counties had their own waivers in our sample period. Our initial sample focuses on the 87% of observations where there was no waiver and the work requirements were thus in effect. We use the other 13% of the sample when waivers were in place as a placebo check and control group.

We report the percent of new applicants denied overall and by reason in Table (1). Results for all working-aged (18-64) applicants are shown in column (1). In column (2), we restrict to likely ABAWDs, defined as those age-eligible for the requirements (age 18-49 in our sample period), with no children in the household. For initial applicants, we do not have information about applicants' disability status, so we do not restrict on this dimension. Finally, in column (3), we restrict to likely ABAWDs subject to the work requirement, and, in column (4), to likely ABAWDs where a waiver is in place.

In the mountain-plains state, we find 40% of working-aged new applicants, and, 53% of all denied applicants (40/75), are denied for procedural reasons.³ Likely ABAWDs are denied for procedural reasons at higher rates than all working-aged applicants—45% of new applicants and 62% of all denied applicants (45/73). Finally, procedural denials, and overall denials, are much higher for likely

²As we discuss below, our analyses are conducted on the time period when working-age was defined as 18-49. Individuals are also exempt if they are pregnant, and, for a few years after our sample period, individuals are exempt if they are a veteran, experiencing homelessness, or below age 24 and in foster care on their 18th birthday.

³The overall denial rates are higher in this sample of working age SNAP applicants than all SNAP applicants (Cook and East, 2023) possibly due to differences in demographics.

Table 1—: New Application Denial Reasons

	Likely ABAWDs (18-49, No Kids)			
	Aged 18-64	All	No Waiver	Waiver
Procedural denial	40.373	45.212	46.148	39.560
Ineligible (for any reason)	25.290	20.751	21.053	18.929
All other reasons	9.128	7.391	6.925	10.206
% Denied	74.781%	73.340%	74.112%	68.684%
Observations	461569	202571	173784	28787

Note: Uses administrative data from the mountain-plains state and includes new applications between 2012-2019.

ABAWDs subject to the work requirement, than those in the waiver sample. This suggests that work requirements increase procedural denials, which we investigate more formally below.

II. Results

To identify the causal effect of the work requirement, we exploit the fact that ABAWD Work Requirements only apply to those under age 50 in our sample period.⁴ For this analysis, we include applicants between the ages of 44 and 52, with no children in the household. Our primary estimating equation is:

$$(1) \quad Y_i = \alpha + \beta_1 \text{Above}49_i + \varepsilon_i,$$

where Y_i is the application outcome for individual i applying for SNAP benefits. $\text{Above}49_i$ is an indicator variable for whether the individual is over the age of 49. We cluster standard errors at the county level. We begin with this simple difference approach, instead of a regression discontinuity approach, to maximize power given small sample sizes around the age cutoff.⁵

Our outcome variables are as follows: 1) whether the applicant is denied for a procedural reason; and 2) whether the applicant is denied for any reason. We anticipate that if work requirements increase administrative burdens, the coefficient, β_1 , will be negative for the first outcome, because once individuals age out of being subject to work requirements, their likelihood of procedural denial decreases. To understand whether procedural denials are substituting for other types of denials, we also look at the second outcome. For this outcome, β_1 will be negative if procedural denials do not perfectly substitute for other reasons for denial.

Our results on procedural denials are shown in panel (a) of Figure (1). The results confirm the hypothesis that work requirements increase procedural denials. In particular, new applicants subject to the work requirements are 8 percentage points more likely to be denied for procedural reasons. This is a meaningful decline of 22% relative to the sample mean of 37%.

We next investigate whether these differences could be due to other differences among applicants above and below age 49. To do so, we implement a placebo test using the sample where waivers for the work requirements are in place. We anticipate there will be no differences in the outcomes of interest in this sample, and the results confirm this in panel (b) of Figure (1). Finally, we implement a difference in difference approach estimated using the following equation:

$$(2) \quad Y_{ict} = \alpha + \beta_1 \text{Above}49_{it} + \beta_2 \text{NoWaiver}_{ct} + \beta_3 \text{Above}49_{it} \times \text{NoWaiver}_{ct} + \mu_c + \gamma_t + \varepsilon_{ict}$$

⁴SSI does increase in availability to disabled individuals over age 50. Because we do not observe disability status for new applicants, we cannot directly test whether this affects our results. Instead, to assess this, we split the sample based on whether individuals have any positive earnings the quarter before applying to SNAP. We find the results are similar among those recently working and less likely to qualify for SSI are impacted.

⁵We also checked that our results are robust to controlling for applicant demographics.

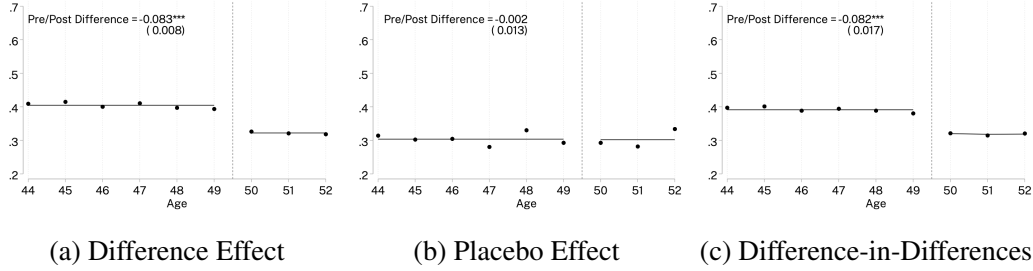


Figure 1. : Effects on Procedural Denials

Note: Uses administrative data from the mountain-plains state and includes new applications between 2012-2019. Reports results from the specifications shown in Equations (1) and (2). Panel (b) includes only individuals who resided in a county during years in which the ABAWD work requirement was waived.

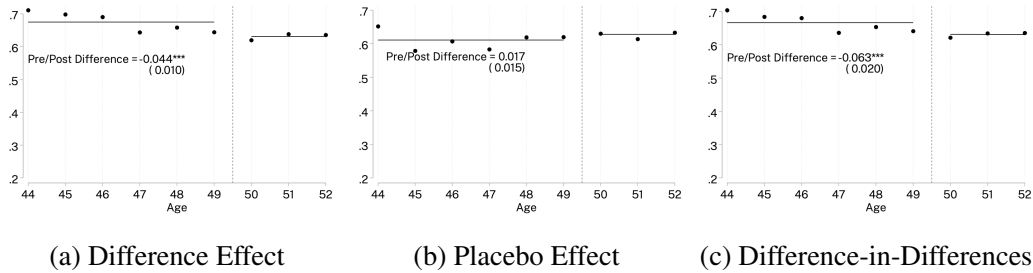


Figure 2. : Effects on Any Denial

Note: Uses administrative data from the mountain-plains state and includes new applications between 2012-2019. Reports results from the specifications shown in Equations (1) and (2). Panel (b) includes only individuals who resided in a county during years in which the ABAWD work requirement was waived.

Here, $NoWaiver_{ct}$, is equal to 1 if county, c , in time t has no waiver active. We also include county fixed effects and calendar-month-by-year fixed effects. β_3 is the coefficient of interest, indicating whether the difference in outcomes for those above and below age 49 is different when there is no waiver for work requirements. The results are shown in panel (c) of Figure (1), and are very similar to those in our basic difference model.

Finally, we look at the effects of the work requirement on overall denials in Figure (2). The primary difference effects are shown in panel (a) and show a decrease in the likelihood of being denied for any reason among those not subject to work requirements. Specifically, we see that those not subject to the work requirements are 5 percentage points less likely to be denied. In panel (b), we conduct our placebo test using only observations where a work requirement waiver was in place, and find no effects. Finally, in panel (c) we show results using the difference-in-differences design shown in Equation (2) and we find that the results are similar to what is reported in panel (a).

The fact that the estimated effect on procedural denials is larger than the effect on overall denials is explained by some substitution in denial reasons. In results not shown, we find that the ABAWD work requirements reduce the likelihood of denial for eligibility reasons by 2.9 percentage points and denial for other reasons by 0.9 percentage points. A possible explanation for this is that some procedural denials measure the effect of individuals who learn they are unlikely to qualify for the program and stop pursuing benefits. However, the magnitudes imply that over 50% of those denied for procedural reasons are not substituting from another denial reason.

III. Discussion

This paper provides new, direct evidence on the effect of work requirements on administrative burdens and program access. Our results demonstrate that the SNAP Work Requirements for Able-Bodied Adults Without Dependents increase the likelihood of new applicants being denied benefits for procedural reasons, our measure of administrative burdens. Our results suggest that removing these work requirements, which have been shown to have little effect on work themselves, would reduce procedural denials in our sample by 19-26% and overall denials by 4-10%. We add to the

literature on SNAP work requirements by being the first to demonstrate the direct effects of these requirements on administrative burdens. Additionally, we complement the larger literature on administrative burden in SNAP, which finds that reducing other types of burdens increases SNAP participation (Homonoff and Somerville, 2021; Giannella et al., 2024; Finkelstein and Notowidigdo, 2019; Schanzenbach, 2009).

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