

Four Work Requirements, One Person

The Cross-Program Burden

Keisha's Monthly Compliance Calendar

Keisha Davis maintains a spiral notebook with color-coded tabs. Blue for Medicaid. Green for SNAP. Yellow for childcare. Orange for her Section 8 housing voucher. Each section contains deadlines, documentation requirements, and contact numbers for caseworkers who never seem to be the same person twice.

This month, her compliance schedule looks like this: By the 10th, she needs to submit her work verification to the housing authority, which wants employer letters on company letterhead confirming her hours for the past quarter. By the 15th, her SNAP recertification is due, requiring pay stubs from the last 30 days and a new statement about any changes in household composition. By the 20th, she must verify her childcare subsidy eligibility by providing her work schedule for the coming month, even though her manager rarely posts schedules more than a week in advance. And now, starting December 2026, Medicaid will require monthly verification of 80 hours of work or qualifying activities, with its own documentation standards and submission portal.

Keisha works 32 hours a week as a home health aide, a job she loves but that pays \$14.50 an hour without benefits. Her work is meaningful: she helps elderly and disabled clients maintain independence in their homes. Her income qualifies her for all four programs, and she needs all four to make ends meet. Without SNAP, she would struggle to feed her two daughters. Without childcare assistance, she could not work the hours she works. Without Medicaid, she would have no health insurance. Without housing assistance, her \$1,450 monthly earnings would not cover market rent in her city.

The irony is not lost on her. She spends roughly eight hours each month proving she works so she can continue receiving the assistance that allows her to work. That is a full workday spent on compliance, nearly equivalent to what she loses from her paycheck each month for taxes. The time she spends on paperwork is time she cannot spend with her children, time she cannot pick up an extra shift, time she cannot invest in herself.

When she misses a deadline, the consequences cascade. A brief SNAP suspension in 2023 meant she fell behind on her housing authority rent portion, which triggered a compliance review that required three trips to their office during work hours. Each trip meant lost wages. Each lost wage meant less money for everything else. The system designed to provide stability becomes, through its very operation, a source of constant instability.

The Patchwork Quilt of Requirements

The American safety net evolved not as a coherent system but as an accumulation of programs, each created at different times, administered by different agencies, and designed with different populations in mind. Work requirements followed the same pattern. What emerged is not so much a system as a patchwork quilt with seams that do not quite align.

SNAP's work requirements trace to 1996 welfare reform, when Congress created the Able-Bodied Adults Without Dependents category subject to time limits and work provisions. Under current law as amended by the One Big Beautiful Bill Act, SNAP participants aged 18 to 64 without dependents

under 14 must work or participate in qualifying activities for at least 80 hours monthly to maintain benefits beyond a three-month window within any 36-month period. The federal food assistance bureaucracy, centered in the USDA Food and Nutrition Service, oversees these requirements through state social services agencies.

TANF's work requirements emerged from the same 1996 reforms but operate under entirely different mechanics. States must achieve work participation rates of 50 percent for all families and 90 percent for two-parent families, with individuals generally required to participate in countable activities for 30 hours weekly, or 20 hours for single parents with children under six. Two-parent families face 35-hour requirements, or 55 hours if receiving federally-funded childcare. The Department of Health and Human Services' Administration for Children and Families oversees TANF, creating administrative separation from SNAP even though both programs often serve the same families.

Childcare subsidy work requirements under the Child Care and Development Fund vary considerably by state, typically requiring 20 hours of work or work-related activity per week. The same HHS umbrella that covers TANF also covers childcare subsidies, but operational administration occurs through state childcare agencies that may be organizationally distinct from TANF administrators.

Housing voucher work requirements are currently emerging rather than established. The Department of Housing and Urban Development is developing regulations that would allow or require public housing authorities to impose time limits and work requirements on voucher recipients. Under Moving to Work demonstration authority, approximately 139 housing authorities already have flexibility to implement such policies, with proposals to expand this to all 3,600 housing authorities nationwide. While most elderly and disabled voucher holders would be exempt, millions of working-age adults could face new requirements layered on top of existing program obligations.

Medicaid work requirements under the One Big Beautiful Bill Act add yet another layer, requiring 80 hours monthly for expansion adults beginning December 2026, administered by state Medicaid agencies that may or may not share systems with SNAP and TANF counterparts. The Centers for Medicare and Medicaid Services provides federal oversight, a different agency again from those governing food assistance, cash assistance, childcare, or housing.

This is not merely bureaucratic complexity. It is the practical reality that a single family may need to satisfy requirements from four different federal agencies, operating through four different state or local counterparts, each with its own rules, documentation standards, reporting cycles, and caseworkers. The patchwork is not a metaphor; it is the lived experience of administrative navigation.

The Arithmetic of Burden

Consider what these requirements mean in practical terms. The hour thresholds are similar but not identical: 80 hours monthly for SNAP and Medicaid, approximately 80-120 hours monthly (depending on family structure) for TANF, 80 hours monthly (at minimum) for childcare, and varying formulas for housing. A person working full-time at 160 hours monthly easily exceeds all thresholds. But the requirements do not simply ask whether someone works; they demand proof.

Each program requires documentation, but the acceptable forms differ. SNAP may accept self-attestation for initial applications but requires employer verification for ongoing compliance. TANF

often requires participation in specific program activities with attendance tracked by caseworkers. Childcare subsidies need work schedules that demonstrate both the hours worked and the hours needing coverage. Housing authorities may demand employer letters on official letterhead with specific information about hours, pay rates, and employment duration.

Pay stubs seem like universal documentation, but they are not. SNAP cares about gross income and hours. TANF cares about participation in approved activities, which may or may not align with employment. Childcare subsidies care about schedule predictability. Housing authorities care about annualized income projections. A single pay stub cannot answer all these questions simultaneously.

Reporting cycles compound the confusion. SNAP uses a simplified reporting system in many states, requiring verification at certification and recertification rather than continuously. TANF requires monthly participation tracking. Childcare subsidies often require schedule submissions before each certification period. Housing authorities conduct annual recertifications with interim reporting requirements. Medicaid work requirements will add semi-annual verification cycles for expansion adults.

This means that a family receiving all four types of assistance might face compliance deadlines in eight or more months of the year, with different deadlines in different months, requiring different documentation submitted to different agencies through different portals or offices. Missing one deadline does not just affect one program; it can trigger reviews across programs that share information, creating cascading compliance crises.

The time investment is substantial. Research on administrative burden documents that low-income families spend significant portions of their available time on compliance activities. For someone working unpredictable hours in the service sector while parenting young children, the six to ten hours monthly that comprehensive program compliance may require represents a real and meaningful cost. That time could otherwise be spent working additional hours, caring for children, pursuing education, or simply resting.

Exemptions do not transfer cleanly across programs. A person deemed medically exempt from SNAP work requirements may need separate documentation and separate determination for Medicaid exemption. A parent caring for a child who qualifies for TANF exemption may find that the childcare subsidy program uses a different age cutoff for dependent children. The pregnant woman exempt from Medicaid work requirements during and after pregnancy may find that SNAP's pregnancy exemption operates differently. Each program has its own exemption categories, its own documentation requirements for claiming exemptions, and its own adjudication processes.

Who Bears the Burden

The population subject to multiple work requirements is not a random sample of low-income Americans. The concentration of multiple program participation occurs among specific demographic groups facing specific structural challenges.

Single mothers represent the paradigm case. They are more likely than other household types to rely simultaneously on food assistance, cash assistance, childcare subsidies, and health coverage. They are also more likely to work in sectors characterized by unpredictable scheduling, low wages, and limited benefits. The retail worker, the home health aide, the food service employee: these jobs do not come with stable schedules that make compliance verification straightforward.

Geographic patterns matter as well. In rural areas, limited employer options mean more workers depend on small businesses less equipped to provide formal documentation. Transportation barriers make in-person verification appointments more costly. Limited broadband access complicates online submission requirements. The same geographic isolation that creates barriers to employment creates barriers to proving employment.

Deep poverty concentrates multi-program participation. Families with incomes below 50 percent of the federal poverty level are more likely to need the full range of assistance, which means they face the full range of compliance requirements. The very depth of need that qualifies families for multiple programs is often correlated with conditions that make compliance more difficult: housing instability that complicates mail delivery, mental health challenges that impair executive function, family crises that consume attention and time.

Communities of color bear disproportionate burden through these mechanisms. Higher poverty rates mean higher rates of program participation. Historical patterns of employment discrimination mean higher concentration in sectors with documentation challenges. Geographic patterns of residential segregation mean higher concentration in areas with limited administrative infrastructure. The neutral language of work requirements produces racially patterned outcomes through these structural pathways.

Educational attainment intersects with administrative capacity. Navigating four different programs with four different sets of rules requires reading comprehension, calendaring skills, and comfort with bureaucratic processes. Adults with limited formal education may find these requirements genuinely difficult to manage, not from unwillingness but from the cognitive demands of complex systems.

The result is that those least equipped to manage administrative complexity face the most administrative complexity. The systems ostensibly designed to support families struggling with poverty create additional struggles that absorb time, attention, and emotional energy.

The Cross-Program Verification Opportunity

The patchwork creates burden, but it also creates opportunity. If programs share populations, they could share verification. The question is whether the administrative infrastructure exists to enable such sharing and whether the political will exists to create it where it does not.

State integrated eligibility systems represent one pathway. Approximately two-thirds of states have implemented or are implementing technology platforms that allow residents to apply for multiple programs through single applications. The "no wrong door" model envisions that someone entering the system for one program automatically screens for all programs they might qualify for. This same principle could apply to verification: if someone demonstrates work hours for SNAP purposes, that demonstration could propagate to Medicaid, childcare, and housing without requiring separate submissions.

The technical capacity exists. Modern data exchange standards, application programming interfaces, and cloud infrastructure make real-time information sharing technically feasible. State unemployment insurance systems maintain quarterly wage data. State workforce agencies track participation in training programs. State departments of revenue have income information from tax filings. The information needed to verify work often already exists within government systems.

Data sharing agreements present the administrative mechanism. The Privacy Act, HIPAA, and program-specific confidentiality rules govern what information can be shared among programs.

These rules are navigable; many states already share eligibility information across programs for determination purposes. Extending this sharing to work verification requires expanding existing agreements rather than creating entirely new frameworks.

The vision is straightforward: a worker submits employment verification once, to one system, and that verification satisfies requirements across all applicable programs. When an employer reports quarterly wages to the unemployment insurance system, that report could trigger automatic satisfaction of work requirements across programs rather than requiring the worker to separately document the same information four times.

Single documentation standards could emerge. ***If states defined what constitutes acceptable verification and applied that definition across programs, the documentation burden would shrink dramatically.*** An employer letter that satisfies Medicaid could satisfy SNAP could satisfy childcare could satisfy housing. A pay stub format that works for one program could work for all.

Unified reporting cycles would reduce the frequency of compliance activities. Instead of facing different deadlines in different months, a family could complete a single annual or semi-annual comprehensive verification that applies across their program portfolio. The calendar would contain one compliance season rather than perpetual compliance obligation.

Barriers to Integration

If integration is technically feasible and would reduce burden, why does the patchwork persist? The barriers are real, even if they are surmountable.

Federal agency fragmentation creates the most fundamental obstacle. SNAP operates under USDA. TANF and childcare operate under HHS. Housing operates under HUD. Medicaid operates under CMS, an HHS agency but one with its own regulatory apparatus. Each agency has its own statutory authority, its own regulatory frameworks, its own relationships with states, and its own bureaucratic cultures. Coordinating across these boundaries requires political leadership that spans agency jurisdictions.

State agency fragmentation mirrors the federal pattern. Medicaid may operate through a health department or a standalone Medicaid agency. SNAP and TANF often share a human services agency, but childcare may sit in an education department. Housing authorities are typically independent entities with their own governance. Getting these agencies to share systems, processes, and data requires governors or legislators to mandate coordination that agencies may not pursue voluntarily.

Privacy regulations create genuine legal complexity. Information shared for Medicaid purposes cannot automatically be used for other purposes without specific authorization. SNAP confidentiality rules restrict how participant information can be disclosed. Housing authorities operate under their own privacy frameworks. Lawyers must carefully map what sharing is permissible, and that careful mapping takes time and resources that competing priorities may not leave available.

IT system incompatibilities present practical implementation challenges. Legacy eligibility systems were often built program-by-program over decades. Connecting systems that were designed independently requires interface development, data standardization, and testing that strain already-stretched IT resources. States that have attempted integrated eligibility modernization have faced multi-year timelines and significant cost overruns.

Political resistance to simplification reflects competing values. Some policymakers view administrative burden as a feature rather than a bug: complexity serves to limit program participation to those sufficiently motivated to navigate it. From this perspective, reducing burden might increase participation and therefore increase costs. Others worry that reduced verification creates opportunities for fraud, even though research consistently shows that fraud rates in means-tested programs are low and that most coverage losses from administrative processes affect eligible participants.

Bureaucratic turf protection is perhaps the most frustrating barrier. Agencies that control their own systems, processes, and relationships resist ceding that control to cross-agency coordination. Caseworkers whose professional identity centers on program expertise may resist becoming generalists. Information technology staff whose budgets depend on maintaining separate systems may not enthusiastically support integration that would reduce their scope.

What Navigation Organizations Need

While waiting for systemic integration that may or may not arrive, community organizations and navigators must help real people manage real complexity. This requires developing specific capabilities that the current patchwork demands.

Cross-program expertise is non-negotiable. Navigators cannot effectively serve clients while understanding only one program. They need working knowledge of SNAP, TANF, childcare, housing, Medicaid, and the work requirements associated with each. This is a tall order. Training curricula must expand beyond single-program certification to encompass the full range of programs a client might use.

Priority triage helps clients allocate limited compliance capacity. When a client cannot possibly meet all deadlines in a given month, navigators need frameworks for deciding which deadlines matter most. Housing termination typically has the most severe consequences and should generally take priority. Medicaid termination affects healthcare access. SNAP termination affects food security. Childcare termination can make work impossible. Understanding these stakes helps navigators guide clients toward the highest-priority compliance activities.

Calendar integration tools help clients track what is due when. A shared calendar that displays all program deadlines, color-coded by program, provides clients visibility into their compliance obligations. Reminder systems that prompt action before deadlines create margin for error. Document checklists that specify what each program requires reduce the likelihood of submissions rejected for incompleteness.

Advocacy for cross-program coordination positions navigators as system-change agents, not just system-navigation facilitators. Navigators who document the specific ways that cross-program burden harms specific clients provide evidence that policymakers need to understand the problem. Case studies, data collection, and testimony before legislative bodies translate individual experiences into collective political voice.

Technology tools for multi-program navigation are increasingly available. SDOH platforms designed to connect people to resources often include program eligibility screening across multiple programs. Document management systems help clients maintain the portfolio of verifications they need across programs. Mobile applications that provide reminders and enable document submission reduce the logistical barriers to compliance.

Return to Keisha

What would an integrated system mean for Keisha Davis? Instead of maintaining four color-coded sections in her spiral notebook, she might have a single account in a unified benefits portal. She would submit her employer's hours confirmation once, annually or semi-annually, and that submission would propagate to every program she participates in.

When her schedule changed, she would report it once, in one place, and every affected program would receive the update. When her certification periods approached, she would complete one comprehensive review rather than four separate processes. When she needed help navigating the system, she could talk to one caseworker with knowledge of all her programs rather than four specialists who each see only their piece of her life.

The eight hours monthly she currently spends on compliance paperwork would shrink to perhaps two hours annually. The anxiety of tracking multiple deadlines would give way to the manageable task of monitoring one calendar. The vulnerability to cascading crises from one missed deadline would diminish as integration reduced the number of separate systems where failure could occur. She could redirect that recovered time toward her daughters, toward additional work hours if she wanted them, toward educational opportunities that might lift her out of the low-wage sector entirely. The administrative burden that currently functions as a tax on her poverty would diminish, freeing resources for the work of building a better life.

This is not utopian fantasy. States like Colorado, Michigan, and Utah have made meaningful progress toward integrated eligibility systems. Federal initiatives around "no wrong door" approaches provide frameworks and sometimes funding for integration efforts. The technical barriers are real but surmountable. The legal barriers are navigable. The political barriers are the ones that require sustained attention.

Until integration arrives, Keisha and millions like her will continue managing the patchwork. The spiral notebook with its color-coded tabs will remain an essential survival tool. The compliance calendar will continue consuming hours that could be spent on other purposes. The work of proving one works will continue imposing costs that fall disproportionately on those least able to bear them.

The question is not whether integration is possible. The question is whether policymakers will prioritize it.

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