The Spatial Politics of Compliance
When Identical Policy Produces Unequal Geography

In Denver, fourteen community organizations within a ten-minute drive offer work requirement navigation assistance. Digital submission works reliably through broadband connections available to ninety-seven percent of households. Public transit connects residential areas to social service providers with buses running every fifteen minutes during business hours. Cell coverage is universal. A Medicaid expansion adult seeking to verify work hours can accomplish the task in thirty minutes without leaving their neighborhood.

In Las Animas County, southeastern Colorado, the nearest navigation assistance is eighty-nine miles away in Pueblo. Cell coverage is spotty, dropping entirely in the canyons that cut through the high plains. Broadband is unavailable in many areas where population density drops below the threshold that makes infrastructure extension profitable. The county benefits office is open three half-days per week, staffed by one caseworker who also handles SNAP, TANF, and child care subsidies. A Medicaid expansion adult seeking to verify work hours may need to take an entire day off work to drive to the county seat, wait for an available appointment, and navigate systems designed for populations with infrastructure that does not exist here.

Same state. Same policy. Different universe of compliance possibility.

The spatial politics of work requirements reveal a fundamental tension in uniform policy applied to non-uniform geography. Work requirements assume that compliance is equally possible everywhere, that the administrative systems through which people demonstrate their hours are equally accessible, and that the labor markets in which people fulfill requirements offer roughly equivalent opportunities. None of these assumptions hold. *Identical policy produces radically unequal geography,* and the geography of compliance difficulty maps with uncomfortable precision onto the geography of existing disadvantage.

Service Deserts and Navigation Infrastructure

The organizations that will help people navigate work requirements cluster where people with graduate degrees live. This is not conspiracy but economics: nonprofits locate where their staff want to live, where foundation funding flows, where population density supports organizational scale. The result is that *navigation infrastructure concentrates in places that least need it and is absent in places where it is most essential.*

Consider the distribution of community health centers, the organizations most likely to provide work requirement navigation assistance. Federally Qualified Health Centers serve medically underserved populations, but their geographic distribution reflects population density more than medical need. Urban counties average 2.3 FQHCs per 100,000 residents; rural counties average 1.1. The gap widens for other social service organizations without federal mandates to serve underserved areas. Legal aid organizations, benefits enrollment assisters, community action agencies, and workforce development programs all concentrate in metropolitan areas where their fixed costs can be spread across larger client populations.

Rural depopulation accelerates this concentration. As young people leave agricultural and extractive-industry communities for metropolitan job markets, the tax base that supports local services erodes. Schools consolidate. Hospitals close. Social service agencies reduce hours or eliminate outreach. The infrastructure that might help people navigate work requirements disappears precisely as the population remaining becomes older, poorer, and more likely to need Medicaid.

Healthcare workforce distribution compounds service deserts. Primary care providers who might attest to medical exemptions are scarce in rural areas, with fifty-nine percent of designated Health Professional Shortage Areas located in rural communities. A person seeking medical frailty documentation may face a sixty-mile drive to the nearest physician accepting Medicaid, if one is accepting new patients at all. The provider who knows their health history retired three years ago; the locum tenens physician rotating through the community clinic has never seen them before and cannot attest to chronic conditions without extensive documentation the patient may not possess.

The assumption embedded in work requirement design is that *support is available for those who seek it.* This assumption fails systematically in geography where support has withdrawn along with population, where the nearest navigator is hours away, where the nearest broadband connection requires a drive to the county library that is open only when the person is working. The policy does not discriminate by location. The infrastructure required to comply does.

Transportation Geography

The thirty-five mile drive to the county office sounds manageable to people who have never made it. In metropolitan areas, thirty-five miles might mean an hour in traffic. In rural southeastern Colorado, thirty-five miles means a one-way trip on two-lane highways that close unpredictably for weather, livestock, or accidents. It means a vehicle capable of the journey. It means fuel. It means time away from the job whose hours the person is trying to verify.

Transportation barriers to healthcare access affect roughly seven percent of rural adults compared to five percent of urban adults, according to Urban Institute research. But these statistics understate the compliance implications. Missing a healthcare appointment is costly; missing a work verification deadline means losing coverage entirely. The transportation barrier that causes someone to reschedule a doctor's visit becomes, in the context of work requirements, the transportation barrier that causes them to lose Medicaid.

Public transit availability defines the boundary between possible and impossible compliance. Only thirty-six percent of rural residents have access to any form of public transportation, and much of what exists operates limited schedules that do not align with work hours or office hours for benefits verification. Demand-response services, where they exist, typically require forty-eight hours advance booking and serve only specific purposes like medical appointments, not administrative errands like delivering documentation to the county office.

Vehicle access is assumed in car-dependent regions, but vehicle access is not universal. Approximately twelve percent of rural households lack access to a personal vehicle. Among low-income rural households, the figure approaches twenty percent. A person whose car needs repairs they cannot afford, whose license was suspended for unpaid fines, whose insurance lapsed during a period of unemployment, faces compliance barriers invisible to systems designed around the assumption of mobility.

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The economics of vehicle ownership create particular burdens for low-income rural residents. A used car that costs three thousand dollars requires not just the purchase price but ongoing expenses: insurance averaging $1,500 annually, registration and inspection fees, fuel costs that increase with distance, maintenance and repairs that become more frequent as vehicles age. A person earning minimum wage may spend twenty percent or more of gross income on vehicle costs, yet without a vehicle, they cannot reach the employment that pays the wages. The transportation catch-22 is familiar to rural poverty researchers: you need a car to get to work, but you need work to afford a car.

For those whose licenses have been suspended, often for failure to pay traffic fines or child support rather than for driving infractions, ***the barriers multiply.*** License reinstatement requires paying accumulated fines, completing driver improvement courses, and obtaining SR-22 insurance at elevated rates. Each requirement assumes resources that people without income struggle to assemble. A person may be fully capable of working, fully willing to comply with work requirements, but unable to reach any employer because administrative barriers have suspended their legal ability to drive and no alternative transportation exists.

When a requirement that takes thirty minutes in Denver takes an entire day in Las Animas County, the requirement has not remained constant. It has transformed from minor administrative task to major life disruption. ***The policy demands the same behavior, but the cost of that behavior varies by geography in ways the policy does not acknowledge.***

Digital Infrastructure as Geographic Barrier

The FCC's 2024 broadband deployment report found that approximately twenty-four million Americans lack access to fixed broadband service, with the gap most severe in rural and tribal areas. Nearly twenty-eight percent of rural Americans and more than twenty-three percent of people living on tribal lands lack broadband access at speeds adequate for reliable web application use. These figures likely understate the problem: FCC maps have been criticized for overstating coverage by counting areas as "served" if a single provider claims to offer service, regardless of whether service is actually available at specific addresses or affordable for residents.

"Submit online" assumes infrastructure that does not exist for millions of Americans. Work requirement verification systems increasingly mandate digital submission: uploading paystubs, checking requirement status, receiving notices, filing appeals. States have eliminated paper channels to reduce administrative costs and improve efficiency, replacing them with portals that require broadband connections, devices capable of document scanning, and digital literacy that many older and lower-income populations lack.

Cell service provides theoretical backup but practical limitations. Rural cell coverage is genuinely spotty in ways that urban residents may not comprehend. Mountains, canyons, and distance from towers create dead zones where calls drop and data connections fail. A person who can make a phone call from the parking lot of the feed store may be unable to load a web portal from the same location. The document upload that would take thirty seconds on urban broadband may timeout repeatedly on a marginal cell connection, consuming data allowances and producing no successful submission.

The digital divide is often discussed as an adoption problem, a matter of people choosing not to use available technology. In rural America, it is frequently an availability problem: ***the infrastructure does not exist.*** No amount of digital literacy training helps when there is no signal

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to carry the data. No amount of device access helps when the nearest reliable internet connection is at a library seventy-five miles away that is open only when the person is working.

Tribal lands face particularly severe digital infrastructure deficits. The FCC reports that nearly one-third of tribal land residents lack broadband access, but this figure masks extraordinary variation. Some tribal communities have invested in their own broadband infrastructure and achieve connectivity rates comparable to urban areas. Others, particularly in remote reservations in the Southwest and Northern Plains, have essentially no broadband infrastructure at all. A Medicaid expansion adult living on the Navajo Nation or Pine Ridge Reservation may face digital compliance requirements in communities where digital compliance is physically impossible.

The Navajo Nation spans 27,000 square miles across Arizona, New Mexico, and Utah, with a population of approximately 170,000. Broadband coverage reaches only a fraction of this territory. Many families rely on cellular hotspots for internet access, but cell coverage itself is limited by the nation's remote terrain. The nearest town with reliable broadband may be a two-hour drive from a family's home. Winter weather makes even that drive impossible for weeks at a time. A work requirement verification system that assumes internet access assumes infrastructure that simply does not exist for tens of thousands of tribal members.

The digital divide is not merely an inconvenience in these communities; it is a barrier to participation in systems increasingly designed around digital-first assumptions. When Montana eliminated paper verification channels in 2024 to improve administrative efficiency, it effectively made compliance impossible for residents without internet access. The efficiency gain for the majority became exclusion for the minority whose geography placed them outside the digital infrastructure that the system assumed.

Labor Market Geography

Work requirements assume work availability**. *The requirement to work eighty hours monthly presupposes that eighty hours of work exist within reasonable commuting distance.*** This assumption fails in communities where the labor market has contracted to the point that available hours cannot meet policy demands regardless of individual motivation or effort.

Labor market conditions vary dramatically by place. The USDA's Economic Research Service documents persistent employment gaps between metropolitan and nonmetropolitan areas, with nonmetro employment still below pre-pandemic levels in many regions. But aggregate statistics obscure the extreme variation within rural America. ***Some rural communities have tight labor markets with employer demand exceeding available workers.*** Others have experienced decades of economic decline as mines closed, mills relocated, and agricultural employment consolidated, leaving populations with few local employment options.

Seasonal employment compounds rural labor market challenges. Agricultural regions offer abundant work during planting and harvest seasons but little during winter months. Tourism-dependent communities see employment surge in summer or ski season and contract dramatically in shoulder seasons. Resource extraction communities experience boom-bust cycles tied to commodity prices and regulatory changes. A person who easily meets eighty monthly hours from May through October may find it impossible to meet the same requirement from November through February, not because they have stopped seeking work but because the work has stopped existing.

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The service sector jobs that provide year-round employment in metropolitan areas concentrate in population centers. The retail, food service, healthcare, and administrative positions that offer stable if low-wage employment require customer bases that sparse rural populations cannot support. The county seat of six thousand people has limited retail; the hamlet of three hundred has a convenience store, a bar, and a feed store, none of which need additional employees.

What does "eighty hours of work activity" mean where jobs do not exist? The policy offers qualifying activities beyond employment: job search, education, job training, volunteer work. But these alternatives also assume infrastructure. Job search assumes jobs exist to search for. Education assumes educational institutions are accessible. Job training assumes training programs operate within commuting distance. Volunteer work assumes nonprofit organizations exist to accept volunteers. Each alternative presupposes infrastructure that may be absent in the same communities where employment is scarce.

The volunteer work pathway deserves particular scrutiny. In metropolitan areas, hundreds of nonprofit organizations welcome volunteers for roles ranging from food bank sorting to tutoring to administrative support. In a rural county of three thousand people, volunteer opportunities may be limited to the church, the volunteer fire department, and the seasonal food pantry that operates one day per week. A person who cannot find paid employment and cannot access education or job training may also find that volunteer opportunities sufficient to meet eighty monthly hours simply do not exist within reasonable distance. The alternative pathway designed to accommodate people who cannot work becomes another pathway that geography makes impossible.

The monopsony problem compounds rural labor market limitations. In metropolitan areas, multiple employers compete for workers, providing options if one employer offers inadequate hours or conditions. In rural communities dominated by a single major employer, workers have no alternatives. If the coal mine, the hospital, or the meatpacking plant offers only part-time positions or schedules that prevent reaching eighty monthly hours, workers have no recourse. They cannot threaten to take their labor elsewhere because elsewhere does not exist. The labor market structure that restricts their options is not visible in work requirement design that assumes competitive markets with multiple employment opportunities.

The Spatial Sorting of Coverage Loss

If compliance difficulty varies by place, coverage loss will concentrate geographically. Work requirements do not just sort individuals into compliant and non-compliant categories; they sort places into those where compliance is achievable and those where compliance is systematically impossible. ***The geography of coverage loss will map onto the geography of infrastructure absence,*** producing predictable patterns of rural disenrollment.

Arkansas's brief experience with work requirements before judicial intervention provides evidence. Disenrollment concentrated in rural counties where digital infrastructure was weakest and where navigation support was least available. Delta and Ozark communities saw higher coverage loss rates than Little Rock and Fayetteville. ***The people losing coverage were disproportionately working or exempt but unable to navigate verification systems designed around assumptions that did not match their circumstances.***

Tribal populations face compounded spatial barriers. Already experiencing worse health outcomes than the general population, Native Americans living on remote reservations confront

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simultaneous deficits in broadband access, transportation infrastructure, local employment, and navigation support. The Indian Health Service provides healthcare but cannot substitute for Medicaid coverage in communities that rely on Medicaid-funded services. Coverage loss on tribal lands does not merely shift people between insurance programs; it may eliminate access to care entirely in communities where alternatives do not exist.

Geographic health disparities will compound as coverage disparities concentrate spatially. Rural Americans already experience higher rates of chronic disease, worse access to specialty care, and higher mortality rates than urban counterparts. Losing Medicaid coverage in communities with few providers and no safety net alternatives will worsen these disparities. *The feedback loop is predictable:* losing coverage worsens health, worsening health limits ability to work, limited ability to work makes compliance harder, failed compliance produces coverage loss. Geography determines where this cycle begins and how severely it spirals.

The spatial concentration of coverage loss also produces political consequences. Rural communities that supported work requirements as policy may discover that the policy's burdens fall most heavily on their own residents. Urban legislators who voted for requirements affecting populations they will never meet may be insulated from constituent feedback. The political geography of work requirements creates asymmetric visibility: metropolitan compliance may be smooth enough to confirm supporters' assumptions while rural compliance disasters occur in places with limited political voice.

Spatial Solutions for Spatial Problems

Identical policy cannot produce equal outcomes across radically different geography. The spatial politics of compliance demand spatial solutions that acknowledge the infrastructure variation that makes uniform requirements unequally burdensome.

Reduced hour requirements for low-employment-density areas represent one accommodation approach. If local labor markets cannot support eighty monthly hours of work activity, requiring eighty hours produces systematic exclusion of populations whose geography makes compliance impossible regardless of individual effort. States could establish labor market adjustments that reduce required hours in counties with documented employment scarcity, acknowledging that the same behavioral expectation carries different burdens in different places.

Seasonal averaging addresses the mismatch between monthly requirements and seasonal labor markets. A person who works two hundred hours monthly during harvest and twenty hours monthly during winter averages over one hundred hours across the year but fails to meet eighty hours in multiple months. Allowing annual averaging or seasonal adjustments would accommodate the reality of agricultural, tourism, and resource extraction employment patterns without abandoning work expectations entirely.

Verification channel diversity becomes essential rather than optional in communities without digital infrastructure. Maintaining mail-based and phone-based verification channels may be less administratively efficient than digital-only systems, but eliminating these channels produces systematic exclusion of populations without broadband access. The efficiency gain from digital-only systems must be weighed against the coverage loss from populations who cannot use digital systems regardless of their compliance status.

Community hub infrastructure investments could bring verification capacity to underserved areas. Mobile enrollment units, periodic county office hours in remote communities, partnerships

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with libraries and post offices and community centers to serve as access points all require investment but may be necessary to make compliance possible in places where current infrastructure makes it impossible.

The question is not whether spatial accommodation complicates administration. It does. The question is whether work requirements should apply uniform processes to populations whose defining characteristic is infrastructure absence, or whether requirements should be designed to accommodate documented geographic reality. *The first approach* maintains administrative simplicity but produces systematic exclusion. *The second approach* requires investment and complexity but maintains coverage for populations whose circumstances make standard compliance unachievable.

December 2026 implementation will reveal which approach states choose. The choices will manifest through predictable patterns: either verification systems accommodate geographic reality through infrastructure investment and requirement differentiation, or they demand uniform compliance that geographic circumstances make impossible. *Identical policy will produce unequal geography.* The only question is whether that inequality is designed into the system or designed out of it.

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