

Making Supplemental Nutrition Assistance Program Enrollment Easier for Gig Workers

Dory Thrasher, PhD

ABOUT THE AUTHOR

The author is with Mathematica, Princeton, NJ.

In the summer of 2023, New York City announced a new rule mandating a minimum wage for food delivery workers of \$17.96 per hour, with an increase to nearly \$20 per hour in April 2025. DoorDash and Grubhub sued the city, and a judge blocked the law from taking effect.¹ Despite incomplete data on the number of people who work in the smartphone app-mediated gig economy (e.g., driving for Uber, delivering groceries for Instacart or take-out meals for DoorDash), it is clear that this form of labor is on the rise.² Gig work is low paid, offers little to no workplace protections, and is stressful, yet it serves as an important option to earn money for people facing unemployment.

Notably, a growing number of gig workers are parents of young children: a 2017 poll revealed that 16% of all gig workers were stay-at-home parents.³ In a survey of 2000 female gig workers in the United States, nearly a third of respondents said they turned to gig work to make time for caregiving.⁴ For these families, being able to access the Supplemental Nutrition Assistance Program (SNAP) is critically important in maintaining food security for themselves and their families while they engage in precarious, poorly compensated labor.

SNAP provides families money to buy groceries when their incomes are too low for them to afford enough food. In 2022, more than 21 million households containing 41 million people received SNAP benefits. To be eligible, a household's income must be at or below 130% of the federal poverty line (\$36 084 for a family of four in 2023). Income verification is a key piece of the SNAP application process; applicants are required to provide documentation of household earnings, typically four weeks of pay stubs. This system of verification is straightforward for those who work regular hours and are paid on a schedule. However, for those who work inconsistent hours, receive sporadic paychecks, and have minimal documentation of their earnings, this process can be difficult. A great example is described in an article exploring interactions between low-income New Yorkers and the local SNAP agency:

Jeff . . . works as a freelance sound engineer for corporate events. His jobs typically last one or two days. He routinely uses food stamps [SNAP] when work becomes scarce. . . . "They want to see pay stubs and all that," Jeff said, describing his interactions when he went to apply. "And I show them what

little I could show them because I don't get paid that way. There's checks, but they're whenever [my employers] get paid themselves." . . . After a tense interview in which he felt the caseworker was accusing him of trying to scam the system, Jeff was denied food stamps. He called the food stamp office to complain about the caseworker who had initially processed his case, and he was told to apply again, so he did. After 3 months, he was finally approved. His case was flagged, however, because his income was so irregular. Two weeks after his benefits were approved, he received a letter informing him that he was not meeting the work requirements. . . . The paperwork Jeff could provide was not immediately legible to the welfare office workers.⁵

This excerpt illuminates how the rigidity of the current means-testing structure can harm SNAP applicants and recipients with nonstandard work arrangements even when their annual income qualifies them for SNAP. Give that nonstandard work, particularly app-driven gig work, is growing among all kinds of workers, including those with young children, it is crucial to be attentive to the way that it interacts with SNAP program requirements. We need to understand the burdens placed on clients and imagine ways to improve the SNAP application process to support positive citizen-state interactions and improve food security.

NONSTANDARD WORK

"Nonstandard" is a broad category of work that includes those who work for temporary staffing agencies, on-call workers, independent contractors (e.g., those involved in technology-mediated gig work), part-time workers in "conventional" jobs, and contingent

workers who expect their jobs to be temporary. Individuals in nonstandard jobs include construction workers, real estate brokers, substitute teachers, on-call hospital workers, freelancers, and taxi drivers.⁶ Although there have always been nonstandard workers, there is evidence that this type of work is becoming more prevalent, driven by the app-based gig economy (e.g., driving for Uber, delivering food with DoorDash, doing odd jobs through TaskRabbit, and cleaning homes through Handy). Surveys and tax filings show that about a quarter of US workers now earn some part of their income from gig work.^{7,8} Qualitative research has documented people turning to gig work during COVID-related unemployment because of its low barrier to entry.⁹

The low barrier to entry, flexible hours, and lack of commute have made gig work appealing to parents, particularly mothers.^{10,11} The gender imbalance among gig worker parents is pronounced: DoorDash's internal research has shown that although women make up just over half of its delivery workforce, 16% of female delivery workers are parents, as compared with only 3% of male delivery workers.¹²

ADMINISTRATIVE DIFFICULTY

As described in the anecdote about Jeff, those with nonstandard work routinely have difficulty proving their income and work hours in ways that are legible to the SNAP program. The main factor contributing to the burden clients face when proving income and hours for SNAP is collecting and compiling the required documentation. Many intermittent workers, including gig economy workers, do not receive pay stubs, and hours per week is not always

a relevant way to describe their employment. The apps themselves may provide digital records of the money paid out, but the only formal documentation of payment is the Form 1099 sent in January. (Companies are required to send 1099s to people who earn more than \$600, but this is a very recent rule: before 2022, the minimum threshold was \$20 000, meaning many SNAP-eligible gig workers did not receive this document.)

Furthermore, to determine net income, gig workers can deduct self-employment expenses, such as gas and tolls for Uber drivers or supplies for housecleaners. This is an additional paperwork burden heaped upon some of the most stressed and vulnerable workers. The inconsistent income endemic to gig work, combined with a lack of job security and workplace protections, creates intense emotional stress and creates the conditions for diminished executive function because of poverty.

Christensen et al. describe a "human capital catch-22" in which the conditions that make public benefits a necessity, such as poverty and poor health, are the same that reduce executive functioning and make it difficult to navigate applying for benefits.¹³ Low executive functioning can include difficulty engaging in deliberate thought processes, forming goals, planning ahead, carrying out plans, and being efficient and effective. The authors speak specifically to SNAP, writing that documentation requirements to verify income and employment mean that "people with low executive functioning are. . . likely to fail to comply with compliance costs arising from conditions for receipt of public services, meaning that they will be in greater risk of sanctions and exclusion."^{13(p130)} This may be especially

salient for families with young children who have the additional stress of fewer hours available for work because of childcare responsibilities, combined with the particular stress of caring for children while living in poverty or near poverty.

Officially, there are ways to show income other than pay stubs from the preceding four weeks. On a website offering guidance to gig workers applying for SNAP, Mass Legal Services suggests creating profit-loss statements or obtaining a statement of income from an accountant.¹⁴ Similarly, the South Dakota Department of Social Services provides an example "employment ledger" template that self-employed SNAP applicants can use to record income and expenses in an organized way, although the form asks for attestation that verification of all entries is available.¹⁵ These guidance documents, although helpful, highlight the intense burden of document collection and the difficulty of shoehorning gig work and other nonstandard work into the model of income verification required by SNAP. Also, beyond initial enrollment, SNAP recipients are required to document and report income changes so that benefit levels can be adjusted, a requirement that is nonsensical for those who do not work a regular schedule at a consistent pay rate.

The rules of the SNAP program are interpreted by front-line case workers, "street-level bureaucrats" who implement policy, always have some discretion, and often react to the attitudes and comportment of clients.¹⁶ Accountable to quality control and error rate metrics and timeliness standards and informed by their own experiences and attitudes, caseworkers are not always generous of spirit and clients often come away from interactions feeling

mistreated and rushed through.^{13,17,18} When clients with nonstandard jobs apply for SNAP, they need more support and patience from caseworkers so they can feel confident that they are providing the correct documentation and that it is being interpreted correctly by those who will determine the outcomes of their applications.

ECONOMIC PRECARITY

Updating SNAP systems to better accommodate this growing group of gig workers is critical because those working in nonstandard jobs face greater economic precarity than “regular” workers. The qualities that make these gig work jobs appealing to parents also make them “bad” jobs: they are flexible, but the work is intermittent and inconsistent; there is a low barrier to entry, but the wages are very low and there are almost no job protections.

Research across many domains has shown the economic precarity of gig work. A study of income volatility in a sample of 1 million Chase Bank account holders who had deposits from gig work companies revealed that 55% experienced more than a 30% change in total income month to month. These fluctuations were particularly pronounced for people in the bottom income quintile: 74% of those earning less than \$1000 each month experienced a month-to-month swing of greater than 30%.¹⁹ Gig workers also simply have lower incomes overall; the same study showed that those who earned money from gig economy platforms had lower incomes than the average Chase account holder.

In addition, as the gig economy sector has grown, wages have declined. Average monthly earnings for app drivers and delivery workers were \$1469

in 2013 but only \$783 in 2017, a 53% decline. Nontransport app workers (e.g., housecleaners) earned approximately \$725 to \$750 a month on average.⁸ A study conducted by the Community Service Society of New York revealed that 55% of app-based gig workers in New York City have faced three or more hardships, such as housing insecurity or inability to cover a medical expense, since the start of the pandemic, twice the rate of regular employees. These workers are more likely to qualify for social safety net benefits than traditionally employed workers.²⁰

Women’s participation in the workforce dramatically decreased during the peak of the COVID-19 pandemic. With schools and daycare centers closed, women with small children exited the workforce at rates much higher than those among fathers or women without children. The younger their children, the more likely women were to leave the workforce.²¹ These women, no longer working in standard jobs and responsible for family and household labor, are a growing category of people taking on gig work. Gig workers are also more likely to be people of color, which aligns with research showing that women of color have the lowest paying jobs and the highest poverty rates.^{22,23}

Therefore, it is not only that nonstandard workers face more administrative burdens in applying for SNAP and maintaining their eligible status, they are also more likely to need the benefit in the first place. (In fact, they are more likely to need a more generous benefit, as those working multiple jobs have less time to cook and prepare the healthy meals that a standard SNAP allotment supports and need increased benefits to cover more convenience foods.²⁴)

PRESENT AND FUTURE POLICY SOLUTIONS

Even where states are aware that self-employed workers and gig workers experience challenges in applying for SNAP, the policy solutions are limited. For instance, 23 states offer a simplified self-employment deduction, making it easier for applicants to calculate their net income when applying for SNAP. Although policies such as this no doubt ease some of the burden for some people, they address only a small part of the challenge gig workers face.

The changes to eligibility for unemployment benefits during COVID offer a glimmer of what is possible for SNAP. The Coronavirus Aid, Relief, and Economic Security (CARES) Act created the Pandemic Unemployment Assistance Program, which allowed self-employed workers, freelancers, and independent contractors (including gig economy workers) to claim unemployment benefits for the first time. To claim unemployment assistance, workers had to self-certify that they were unemployed, and benefits were calculated on the basis of previous earnings. This broad expansion of eligibility to new categories of workers highlights the increasing prevalence and precarity of nonstandard work and reveals that policies need to change to meet these workers’ needs.

SNAP, too, changed during COVID. Most states were granted waivers to provide emergency allotments during the public health emergency; that is, they were able to issue families the maximum SNAP benefit for their household size. Many states extended certification periods, waived periodic reports, and did not require application interviews. These changes smoothed the application process for SNAP recipients and SNAP agencies, making the

benefit easier to access and reducing churn. Those who would have had the most difficult time applying for and maintaining SNAP benefits would have benefited the most from these changes.

Most of the pandemic-motivated policy changes have now expired, but SNAP can change, permanently, to better support gig workers, freelancers, and other nonstandard workers. For instance, SNAP can expand the acceptable types of income documentation and train eligibility workers to better understand how gig workers are paid. SNAP agencies can adopt time frames for income lookbacks other than the preceding four weeks. Standard certification periods should be lengthened so that people do not have to go through the exercise of reproofing their volatile income as frequently as they do now. Periodic reporting requirements should be eliminated. SNAP agencies should allow people to self-certify their income at recertification, accelerate plans to expand automatic income verification by matching to IRS data, or even pursue automated enrollment for those with SNAP-eligible incomes based on previous years' tax returns.

In *Recoding America*, Jennifer Pahlka points out that

You can have [a] system that does every possible thing policymakers can think of to ensure “program integrity” (in other words, making sure no one is getting a dollar more than they should) or you can have systems that scale. You can't have both. And most of what policymakers do to ensure program integrity ends up costing far more in administration than the program saves on paying out benefits. Those costs include the failure of the system when the benefits are most needed.^{25(p53)}

Streamlining SNAP enrollment for gig workers is not only about updating a particular administrative process for a new reality of low-wage work, it is about reimagining how to support people struggling to feed themselves and their families. As suggested by Michener and Brower, the goal is not improving programs broadly but identifying the way policies affect different groups and making targeted efforts to reduce poverty and improve economic mobility for the most marginalized.²³ Making it easier—or even possible—for Uber drivers, DoorDash workers, and part-time housecleaners to access SNAP is crucial for building trust in the social safety net and allowing it to do its job. **AJPH**

CORRESPONDENCE

Correspondence should be sent to Dory Thrasher, PhD, PO Box 2393, Princeton NJ 08543 (e-mail: dthrasher@mathematica-mpr.com). Reprints can be ordered at <http://www.ajph.org> by clicking the “Reprints” link.

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CONFLICTS OF INTEREST

The author declares no conflicts of interest.

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Conducting Health Research with Native American Communities

Edited by Teshia G. Arambula Solomon, PhD and Leslie L. Randall, RN, MPH, BSN



The current research and evaluation of the American Indian and Alaska Native (AIAN) people demonstrates the increased demand for efficiency, accompanied by solid accountability in a time of extremely limited resources. This environment requires proficiency in working with these vulnerable populations in diverse cross-cultural settings. This timely publication is the first of its kind to provide this information to help researchers meet their demands.

This book provides an overview of complex themes as well as a synopsis of essential concepts or techniques in working with Native American tribes and Alaska Native communities. *Conducting Health Research with Native American Communities* will benefit Native people and organizations as well as researchers, students and practitioners.



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