



Evaluation of Child Support Enforcement Cooperation Requirements in SNAP

Final Report, Volume I – Main Report

June 2024

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Executive Summary

This report responds to a Congressional mandate in the 2018 Farm Bill (Public Law 115-334) for the Food and Nutrition Service (FNS) in the U.S. Department of Agriculture (USDA) to conduct an evaluation of child support cooperation requirements in the Supplemental Nutrition Assistance Program (SNAP).

Child support cooperation requirements refer to a set of policies that mandate households receiving certain public benefits cooperate with their State's child support program as a condition of benefit receipt. Most commonly, the requirement applies to families with a noncustodial parent living outside the household.¹ States vary in how they define cooperation, but it generally means that a person seeking or receiving assistance and who is subject to the requirement must (1) respond to outreach from the child support program and (2) assist the child support program in its efforts to establish paternity (if necessary) and establish, modify, and enforce child support orders on behalf of the family.

The 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) gave States the option to include a child support cooperation requirement in SNAP (Public Law 104-193 and 7 CFR pt. 273.11). As of fiscal year 2023, nine States had a cooperation requirement for SNAP participants (USDA, 2023). In some States, cooperation includes both providing information and attending the court or administrative proceedings needed to establish an order. All States with cooperation requirements have good cause exemptions from the requirement, which most often applies when participation in the child support process would expose the custodial parent or their children to increased risk of domestic violence. States that use the option to implement a cooperation requirement in SNAP are only permitted to sanction (that is, disqualify) the noncooperating parent, not the entire SNAP household. In addition, a SNAP applicant who meets the cooperation requirement for Temporary Assistance for Needy Families (TANF) or Medicaid is considered to be cooperating for the purposes of SNAP.

Informing an Ongoing Policy Debate on the Merits of Cooperation Requirements

Leading up to the passage of the 2018 Farm Bill and in the years that followed, there has been an active debate about the advantages and disadvantages of States implementing a child support cooperation requirement policy in their SNAP programs (Doar, 2016; Llobrera, 2020; Cancian and Doar, 2023). The discourse has focused on the implications of this requirement for custodial and noncustodial parents and their children, the specific public programs, and society.

Supporters of the cooperation requirement argue that it is a tool that can be used to increase the amount of child support paid to custodial parents and reduce their need for government

¹ A range of terms are used to describe the parent or parents who owe child support. The variation reflects the diversity of family and parenting arrangements. This includes shared custody arrangements or situations in which a relative or other guardian is a child's primary caretaker. This report uses the term "noncustodial parent" to describe the parent who is required to pay child support. Similarly, the term "custodial parent" is used to describe those who have primary custody, including both the biological parent and other caretaker with legal custody of the child.

assistance. Many single-parent families that are owed child support often receive less than the legally ordered amount, or no support at all (Grall, 2020). Proponents emphasize that this type of requirement has the potential to increase the amount and stability of support available to families with low incomes while also holding noncustodial parents accountable for financially supporting their children. In addition, they note that there are potential cost savings to SNAP programs if the amount of child support collected on behalf of custodial parents reduces the amount of SNAP benefits for which they are eligible. A cooperation requirement for SNAP participants has also been promoted as a means to counter the decline in the child support caseload by reaching more families who may need child support (Doar, 2016).

Critics of the policy highlight the potential negative consequences associated with mandating cooperation with child support (Llobrera, 2020). They note the limited ability of many noncustodial parents to pay child support at the level and consistency that would reduce the need for government benefits. Moreover, they worry that sanctions for noncooperation, either because parents purposefully do not cooperate or because they do not understand the policy requirement, will jeopardize already precarious food security for these families. They also describe the potential impact on the relationship between the parents. In some instances, the introduction of formal child support orders may jeopardize informal agreements between the parents that may encompass support and custody arrangements. In other instances, there may be a risk of domestic violence that would be heightened by the opening of a child support case (Child and Family Research Partnership, 2015). Some also express concern with a mandate to participate in an additional government program and worry that cooperation requirements may deter food-insecure families from seeking assistance because they want to avoid getting involved with the child support program.

Despite the vocal debate about this policy, there is little empirical research exploring the implications of cooperation requirements for SNAP and child support programs and the families they serve. This study helps fill this gap. It uses a combination of qualitative data and State administrative data to study child support cooperation requirements in SNAP. This includes examining the implications for both families with low incomes who are seeking or currently receiving SNAP benefits and the SNAP and child support programs that serve them. It provides the most comprehensive picture to date of the specific policies in States with this requirement, as well as the operational realities and challenges of these requirements for both the SNAP and child support programs.

Study Approach

The study used a mixed methods approach to provide a detailed picture of the implementation and outcomes associated with applying a child support cooperation requirement in States. It includes five States that currently have cooperation requirements in SNAP (Arkansas, Idaho, Kansas, Michigan, and Mississippi) and three States (Ohio, Tennessee, and West Virginia) where there had been recently proposed legislation to mandate a cooperation requirement in SNAP. In all study States, the research team collected administrative data from SNAP and/or child support programs and interviewed staff and SNAP participants. Administrative and cost data from one

study State (Kansas) provided information to assess the associated costs and net benefits of the cooperation requirement.²

Key Findings

This study has important lessons for policymakers and program administrators who are considering the implementation of child support cooperation requirements. The findings suggest that a range of policy environments and other conditions make it difficult to support a cost-efficient implementation of the cooperation requirement, and that it would be challenging to improve family economic security by requiring cooperation with child support. Exhibit ES.1 summarizes key considerations for implementing a child support cooperation requirement in SNAP. Policymakers and program administrators should carefully assess the potential challenges and facilitators involved in implementing the requirement and the likely effects on participants' economic well-being.

Exhibit ES.1. Key considerations for implementing cooperation requirements in SNAP

Operational considerations

Automated interfacing data systems are key to implementation but require substantial upfront cost for States that don't already have them.



- Staff said it was critical to have data systems that automatically pass information between SNAP and the child support program.
- One of the eight study States did not have to enhance its data systems to implement the requirement and had minimal start-up costs as a result. For other States in the study, staff estimated that making data system updates would cost anywhere from \$400,000 to \$5 million.

Ongoing implementation of cooperation requirements creates administrative complexity and costs, particularly for child support staff.



- Implementing staff described a difficult process to verify eligibility of SNAP referrals for child support services.
- Child support staff said many cases referred from SNAP were challenging because the noncustodial parents had limited ability to pay support. Staff also reported that many participants were difficult to work with because they resented being required to cooperate.
- Detailed cost analysis for one State suggested annualized implementation costs of \$1.34 million, most of which were borne by the child support agency.

The requirement may lower SNAP costs for the government, but may increase enforcement costs and offer little benefit to households.



- In the one study State with a detailed cost and impact analysis, estimates suggest households experience a decrease in SNAP benefit payments due to cooperation requirements but no increase in receipt of child support payments. Additionally, the increased enforcement costs associated with cooperation requirements offset any government savings that come from benefit reductions. These estimates have important methodological limitations, however, and might not apply to other States.

² The five study States with cooperation requirements provided 1 month of SNAP administrative data. All of these States except Arkansas also provided child support administrative data for the same month. The three study States that did not have cooperation requirements provided 1 month of administrative SNAP data.

Operational considerations

SNAP households generally cooperate with the requirement even though they find it confusing.



- Four study States provided data on sanctions for failure to cooperate with the requirement. About 3 percent of SNAP households were sanctioned in two of these States, and less than 1 percent were sanctioned in the other two.
- Most participants learned about the requirement for the first time during the SNAP application process. Some were confused about what they had to do to cooperate, why it was required, and what the consequences of noncooperation would be.

The financial stability of parents sanctioned for noncooperation may deteriorate, and getting back in compliance can be challenging.



- After they were sanctioned, participants talked about going without or finding other ways to make ends meet. For those attempting to come back into compliance, the process was often difficult.
- Impact analysis conducted in one study State supports these participant reports. On average, household losses in SNAP benefits associated with the requirement were not offset by increased child support payments.

The requirement may offer little financial benefit for custodial parents and add strain to the co-parenting relationship.



- Many participants did not see the value of pursuing child support without any resulting financial gains. Some participants also worried that their required involvement in the child support program negatively affected their relationship with the other parent. They reported increased tension in the co-parenting relationship as a result of the cooperation requirement.
- Child support and SNAP staff believed cooperation requirements would not increase formal child support collections given the limited financial resources of many noncustodial parents. Moreover, they thought cooperation requirements could disrupt informal support arrangements or familial and relationship dynamics within existing co-parenting arrangements.
- Impact analysis conducted in one study State supports these concerns. About half of new child support orders associated with the requirement did not require the noncustodial parents to make child support payments, reflecting the limited ability of noncustodial parents to make child support payments. Average child support payments received by custodial parents did not increase after implementation.

A noncustodial parent cooperation requirement policy can be confusing to implement and may penalize low-income noncustodial parents for their inability to pay child support.



- Two study States had legislation that required noncustodial parents to cooperate with child support as a condition of SNAP eligibility. In these States, staff had difficulty explaining this policy, including how they would identify noncustodial parents subject to the cooperation requirement and the circumstances under which the requirement would apply. Overall, the lack of specificity in the cooperation policy language as it applies to noncustodial parents, coupled with a lack of policy guidance and training, makes it difficult for staff to understand and consistently implement the policy.
- Noncustodial parent cooperation may require the noncustodial parent to be making full and consistent child support payments to be in cooperation with child support. If a noncustodial parent does not pay their monthly child support order in full or does not pay off the entirety of

Operational considerations

their child support debt, their SNAP benefit could be reduced or denied. Though, in practice, the study States allow for leniency in cases in which the noncustodial parent is making a good faith effort to comply with child support, this leniency is left to the discretion of the caseworker.

- While there are cases in which the requirement may incentivize noncustodial parent cooperation with child support and result in more child support payments, staff and participants expressed doubt that applying a cooperation requirement to low-income noncustodial parents who do not have the means to pay child support would result in more child support payments. Instead, it would likely further erode the noncustodial parents' economic well-being.

States are not adequately implementing good cause exemptions, which are intended to protect parents from domestic violence.



- Analysis of SNAP records revealed that in most study States, less than 1 percent of child support cases had a good cause determination. This low rate suggests cooperation requirements may be exposing families to a risk of violence given the high rates of domestic violence found in a nationally representative study of this population.³
 - Across and within study States, there was variation in (1) staff descriptions of the circumstances that qualify for good cause exemptions, (2) the level of documentation needed to support such an exemption, and (3) the frequency of good cause re-determination. Similarly, only a few participants interviewed for this study said they were informed about good cause exemptions at any point during the cooperation requirement process.
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³ More information at <https://www.acf.hhs.gov/css/policy-guidance/safe-access-child-support-services-scope-issue>.

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Chapter 1 Introduction

This report responds to a Congressional mandate in the 2018 Farm Bill (Public Law, 115-334) for the Food and Nutrition Service (FNS) in the U.S. Department of Agriculture (USDA) to conduct an evaluation of child support cooperation requirements in the Supplemental Nutrition Assistance Program (SNAP). To meet the legislative mandate, FNS contracted with Mathematica and MEF Associates to conduct this evaluation.

1.1. Policy Context

Child support cooperation requirements refer to a set of policies that mandate households receiving certain public benefits cooperate with their State's child support program as a condition of benefit receipt. Most commonly, the requirement applies to families with a noncustodial parent living outside the household.⁴ States vary in how they define cooperation, but it generally means that a person seeking or receiving assistance and who is subject to the requirement must (1) respond to outreach from the child support program and (2) assist the child support program in its efforts to establish paternity (if necessary) and establish, modify, and enforce child support orders on behalf of the family.⁵

Leading up to the passage of the 2018 Farm Bill and in the years that followed, there has been an active debate about the advantages and disadvantages of States implementing a child support cooperation requirement policy in their SNAP programs (Doar, 2016; Llobrera, 2020; Doar and Cancian, 2023). The discourse has focused on the implications of this requirement for custodial and noncustodial parents and their children, the specific public programs, and society.

Supporters of the cooperation requirement argue that it is a tool that can be used to increase the amount of child support paid to custodial parents and reduce their need for government assistance. Many single-parent families who are owed child support often receive less than the legally ordered amount or no support at all. In 2017, approximately 45.9 percent of custodial parents received all the child support payments they were supposed to receive, while 24 percent received some, but not all, payments. The remaining 30.2 percent of custodial parents who were supposed to receive child support received no payments (Grall, 2020).

Proponents emphasize that this type of requirement has the potential to increase the amount and stability of support available to families with low incomes while also holding noncustodial parents accountable for financially supporting their children. In addition, they note that there are potential cost savings to SNAP programs if the amount of child support collected on behalf of custodial parents reduces the amount of SNAP benefits for which they are eligible.

⁴ A range of terms used to describe the parent or parents who are required to pay child support. The variation reflects the diversity of family and parenting arrangements that exist. This includes shared custody arrangements or situations in which a relative or other guardian is a child's primary caretaker. This report uses the term "noncustodial parent" to describe the parent who is required to pay child support. Similarly, the term "custodial parent" is used to describe those who have primary custody, including the biological parent or other caretaker with legal custody of the child.

⁵ While the study used the term "paternity" during data collection, the Office of Child Support Services has since issued guidance that replaces "paternity" with the gender-neutral term "parentage" (OCSS AT-23-11; September 26, 2023).

A cooperation requirement for SNAP participants has also been promoted as a means to counter the decline in the child support caseload by reaching more families who may need child support (Doar, 2016).

Critics of the policy highlight the potential negative consequences associated with mandating cooperation with child support (Llobrera, 2020). They note the limited ability of many noncustodial parents to pay child support at the level and consistency that would reduce the need for government benefits. Moreover, they worry that sanctions for noncooperation, either because parents purposefully do not cooperate or because they do not understand the policy requirement, will jeopardize already precarious food security for these families. They also describe the potential impact on the relationship between the parents. In some instances, the introduction of formal child support orders may jeopardize informal agreements between the parents that may encompass support and custody arrangements. In other instances, there may be a risk of domestic violence that would be heightened by the opening of a child support case (Child & Family Research Partnership, 2015). Some also express concern with a mandate to participate in an additional government program and worry that cooperation requirements may deter food insecure families from seeking assistance because they want to avoid getting involved with the child support program.

Despite the vocal debate about this policy, there is little empirical research exploring the implications of cooperation requirements for SNAP and child support programs and the families they serve. This study helps fill this gap. It uses a combination of qualitative data and State administrative data to study child support cooperation requirements in SNAP. This includes examining the implications for both families with low incomes that are seeking or currently receiving SNAP benefits and for the SNAP and child support programs that serve them. It provides the most comprehensive picture to date of the specific policies in States with this requirement and the operational realities and challenges of these requirements for both the SNAP and child support programs.

1.2. Background Program Context

Child support cooperation requirements exist at the intersection of two large, complex public programs and necessitate interaction between the national child support program and SNAP. In both cases, these programs are at least partially federally funded but require administration and operation at the State or local level.

The National Child Support Program

The national child support program is a partnership between the Federal government and State or Tribal agencies that supervise the program. Congress created the Federal Office of Child Support Services (formerly Enforcement) in 1975 under Title IV-D of the Social Security Act. The Federal office is responsible for setting policy and providing funding to States and Tribes to operate child support programs. State and Tribal child support programs are responsible for

establishing paternity, obtaining and enforcing child support orders, and distributing collections.⁶

Financial support paid through the child support program is an important support for families across the income spectrum that aims to ensure that children who do not live with one or both of their parents receive financial support from both parents. In 2022, it served 12.8 million children, and the money collected by the program on behalf of families owed child support resulted in more than \$30 billion in support (Office of Child Support Services, 2023). Moreover, child support is an especially important source of income for families with low incomes. Researchers found that over half of all families served by the national child support program had incomes at or below 150 percent of the federal poverty line (Sorensen et al., 2018). In addition to serving as a critical source of financial support for families with low incomes, child support payments can reduce families' need for other public benefits. In many cases, increases in receipt of child support can result in reductions to benefits amounts in other programs.⁷

Some States rely heavily on judicial procedures to administer the child support program through partnerships with the judicial system (often family courts) as well as local prosecutors. In other States, the processes for establishing and enforcing child support orders occurs primarily through administrative procedures (Gardiner et al., 2002). In addition, a small subset of States contract with private vendors to operate their child support programs.⁸

It is important to note that many custodial and noncustodial parents establish informal agreements for financial support as well as non-financial supports such as providing child care or purchasing items for their children. In 2017, approximately 12 percent of custodial parents reported informal agreements or understandings to receive support from the noncustodial parent (Grall, 2020). While these informal agreements are one way to ensure both parents support their children, these agreements are not legally enforceable and custodial parents have few legal avenues for ensuring noncustodial parents fulfill these agreements.⁹

Historically, State and Tribal child support programs used a multitude of punitive measures to ensure noncustodial parents were financially supporting their children, including suspending or revoking licenses, imposing bank liens, and reporting past-due support to credit bureaus. In the last 10 years, State and Tribal child support programs across the country have shifted away from a punitive program that penalizes noncustodial parents for nonpayment and are moving toward

⁶ In some States, individual counties have responsibility for the day-to-day operation of child support programs; in others, the program is administered directly by the State.

⁷ The extent to which child support receipt reduces benefit amounts for other programs varies both by specific program and by State. For example, States have the option to disregard some portion of child support that families received for the purposes of calculating TANF benefit amounts.

⁸ As of 2022, there were 10 States in which some case management functions of local child support offices were operated by private vendors (Office of Child Support Services, 2023). States commonly outsource some portion of their child support program (for example, for payment processing, collections, or activities related to the design and maintenance of information systems).

⁹ Informal agreements are not recorded or tracked by child support programs and were not the focus of any analyses for this study.

a family-centered program that offers services to noncustodial parents to help them address their barriers to paying child support (OCSS IM-23-02; June 5, 2023).

The Supplemental Nutrition Assistance Program (SNAP)

SNAP is the largest Federal nutrition assistance program and a crucial support for millions of Americans. In fiscal year 2022, SNAP served an average of 41.2 million people each month with an average household benefit of \$311 (U.S. Department of Agriculture Food and Nutrition Service, 2024). Although many different types of households participate in SNAP, 43 percent of SNAP participants in federal fiscal year 2019 were children and 40 percent of SNAP households included at least one child (Cronquist, 2021). SNAP therefore provides an important source of food and nutrition to children and their families. Additionally, children who live in households receiving SNAP are also automatically certified to receive free school meals.

SNAP provides a monthly benefit to spend on food, with the goal of ensuring that households and individuals with low incomes have access to enough nutritious food to lead healthy, active lives. FNS administers SNAP at the Federal level. State agencies operate the program at the local level, which includes overseeing local SNAP offices throughout the State, making eligibility determinations, and issuing benefits.¹⁰

Eligibility for SNAP is determined at the household level. Households apply for SNAP by completing an application, providing information about their household finances and other circumstances, and participating in a face-to-face or telephone interview. Eligible households receive a monthly benefit via an Electronic Benefits Transfer (EBT) card. They use these cards to buy food at authorized retailers. Households must undergo a recertification process to reassess their eligibility for SNAP at fixed intervals (for example, 6 or 12 months) determined by the State or county agency.

1.3. Child Support Cooperation Requirement Policies

There are a range of public benefit programs where cooperation with the child support program is a condition of benefits receipt. TANF and Medicaid both have a long-standing mandate that custodial parents cooperate with the child support program to receive the full amount of benefits for which they are otherwise eligible to receive. PRWORA expanded use of cooperation requirements across more assistance programs by giving States the option to extend the requirements to programs other than TANF and Medicaid, including SNAP.¹¹ As of fiscal year 2023, nine States had a cooperation requirement for SNAP participants (USDA, 2023).

The TANF cooperation requirement applies to custodial parents applying for basic assistance on behalf of themselves and their minor children. If the custodial parent cooperates with child support, they receive the full TANF benefit without any consequence. If the custodial parent

¹⁰ SNAP is administered at the county level in 10 States: California, Colorado, Minnesota, New Jersey, New York, North Carolina, North Dakota, Ohio, Virginia, and Wisconsin (Makey, 2023).

¹¹ PRWORA also gives States the option to implement a child support cooperation requirement as a condition of receiving child care subsidies.

does not cooperate with child support (and does not qualify for a good cause exemption from the requirement), the family will be ineligible for at least 25 percent of its TANF benefits for a designated period of time.¹² States may further reduce or terminate the TANF benefit altogether. TANF participants are also required to assign their rights to their child support to the State, which means that the State has the option of keeping a portion of the child support paid by the noncustodial parent on behalf of the custodial parent receiving TANF.¹³

The Medicaid cooperation requirement applies to custodial parents who receive health insurance through Medicaid for themselves and on behalf of their children. Whereas the child support cooperation requirement is mandatory in TANF, however, States have the option to refer their Medicaid cases to child support. Also, unlike the TANF cooperation requirement, if the custodial parent does not cooperate with child support, the custodial parent is sanctioned but the children can continue to receive Medicaid.¹⁴ Individuals seeking Medicaid coverage in those States that choose the option to refer cases to child support must assign to the State any rights that they or their children have as a condition of Medicaid eligibility (Roberts, 2003).

The SNAP cooperation requirement differs from that of TANF and Medicaid in some important ways. While the TANF and Medicaid cooperation requirement can only apply to the custodial parent, the SNAP cooperation requirement can be applied to noncustodial parents. As is the case for Medicaid, the penalty for noncooperation in SNAP applies only to the portion of the SNAP benefit provided to the noncooperating parent. Programs do have the option of extending the cooperation status for one assistance program to all assistance programs, despite the differences in each programs' cooperation policy. Therefore, in states exercising this option, a SNAP applicant who meets the cooperation requirement for TANF or Medicaid is considered to be cooperating for the purposes of SNAP.

Among all States that require cooperation in SNAP, there are some similarities across States in the core features of programs' cooperation requirement policies:

- Eight of the nine States require the custodial parent to cooperate with child support. Five of those States apply the requirement to *only* custodial parents. Of the other three States, two apply the requirement to custodial *and* noncustodial parents and one applies the requirement

¹² According to the OCSS Glossary of Common Child Support Terms, good cause is "a legal reason to excuse a person who receives public assistance from cooperating with the child support enforcement process (for example; past physical harm by the noncustodial parent; rape/incest that resulted in pregnancy; or when adoption is being considered)" <https://www.acf.hhs.gov/css/glossary#G>.

¹³ The portion of child support received by the parent during their time on TANF is referred to as the "pass-through" amount, because it is the amount of child support the State collects that it passes through to the family. As of 2023, per the National Conference of State Legislatures, 28 States pass through some portion of child support paid on behalf of the custodial family. State policies also vary in the extent to which they disregard any child support that families receive in calculating family income, which in turn impacts families' benefit amounts. More information is at: <https://www.ncsl.org/human-services/child-support-pass-through-and-disregard-policies-for-public-assistance-recipients>.

¹⁴ However, State Medicaid agencies are not required to refer Medicaid applicants or recipients to child support agencies and may determine which cases are appropriate to refer (OCSS IM-08-03; April 22, 2008).

to custodial parents and noncustodial parents in arrears.¹⁵ The final State requires only noncustodial parents to cooperate (USDA, 2023).

- Cooperation typically refers to providing the child support program with the necessary information to establish paternity and to establish and enforce a child support order. In some States, cooperation includes both providing information and attending the court or administrative proceedings needed to establish an order.
- All States with cooperation requirements have good cause exemptions from the requirement, which most often applies when participation in the child support process would expose the custodial parent or their children to increased risk of domestic violence.

Increased Legislative Focus on SNAP and Child Support Cooperation Requirements

In the last 10 years, there have been increased efforts at the State and Federal level to mandate cooperation with the child support program as a condition of public benefit receipt. Legislators in many States have introduced bills proposing new child support cooperation requirements for SNAP. The content of these bills varies in their specificity regarding who is subject to the cooperation requirements (custodial parents, noncustodial parents, or both); what constitutes cooperation; and the degree to which the legislation specifies program details or delegates that responsibility to State agencies. These bills often die in committee or do not pass, but they reflect a continued interest among a subset of lawmakers in exercising the option in PRWORA to implement these requirements. At the Federal level, the House version of the 2018 Farm Bill (H.R. 2 Section 4011(b)) included provisions that mandated all States to adopt mandatory child support cooperation as a condition of eligibility for SNAP. Though ultimately stripped from the version of the bill signed into law, this provision would have mandated all States to subject custodial and/or noncustodial parents to cooperation requirements. Instead, the final version of the bill that was enacted into law included a mandate to conduct an evaluation of child support cooperation requirements in SNAP.

¹⁵ In Kansas, the SNAP program does not refer noncustodial parents to child support for cooperation. The child support program has the ability to request that noncustodial parents receiving SNAP who have failed to pay child support, return paperwork, or comply with genetic testing may be held in noncooperation. However, child support rarely exercises this ability and program leadership has developed policy guidance encouraging workers to avoid using this as a way to encourage compliance with the child support. Because SNAP does not refer noncustodial parents to child support for SNAP eligibility purposes, we consider Kansas as *not* requiring noncustodial parents to cooperate with child support.

1.4. Study Objectives

This study responds to Congress' request for an evaluation of SNAP cooperation requirements. It can serve as an important resource for Federal and State policymakers who are considering instituting this type of requirement for households receiving SNAP benefits. Specifically, the study has six main objectives, which are intended to fulfill the goals of the study as outlined in the 2018 Farm Bill:

1. Assess the implementation of the cooperation requirement in States with SNAP programs that currently require cooperation with child support.
2. Assess the potential for implementation of cooperation requirements in States that do not currently require cooperation in SNAP.
3. Assess participant perspectives of the potential effects of the cooperation requirements.
4. Assess how State agencies align the procedures for implementing cooperation requirements in SNAP to those in other Federal programs that have a cooperation requirement.
5. Assess the costs and benefits to State SNAP agencies, child support agencies, and households of requiring cooperation with child support in SNAP.
6. Assess the actual and potential impact of cooperation requirements on SNAP eligibility, benefit levels, food security, income, and economic stability in States.

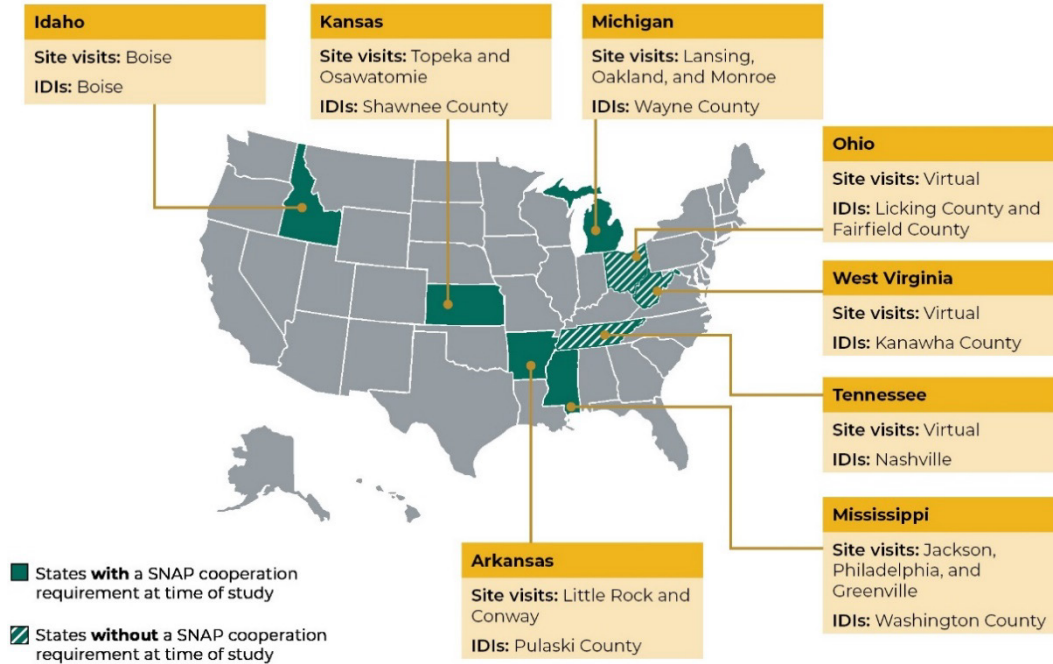
1.5. Overview of Data Collection

The study used a mixed methods approach to answer the key study questions and to provide a detailed picture of the implementation and outcomes associated with applying a child support cooperation requirement in States. Of the nine States that currently require cooperation with child support in SNAP, five States participated in this study: Arkansas, Idaho, Kansas, Michigan, and Mississippi. The study also included three States—Ohio, Tennessee, and West Virginia—where there had been recently proposed legislation to mandate a cooperation requirement in SNAP.¹⁶ (See Appendix A for more detail on study State selection.)

¹⁶ Participation in this study was voluntary. A number of States that either currently had a cooperation requirement in SNAP or in which legislators had proposed a cooperation requirement declined to participate. Most often, the States' rationale for not participating was related to the anticipated workload associated with being part of the study and competing priorities in one or both of the affected programs.

The study utilized in-depth qualitative and quantitative data collection and analysis methods in each of the study States. Exhibit 1.1 identifies the location of the site visits and counties from which in-depth interview participants were recruited.

Exhibit 1.1. Map of study States and cooperation requirement status



The data sources used to inform the study included the following:

- Interviews with SNAP and child support program staff during in-person and virtual site visits in each study State provided information about cooperation requirement implementation considerations and processes, barriers, and facilitators. Interviews were conducted with 63 State and local child support program staff and 96 State and local SNAP staff across the eight study States.
- In-depth interviews with SNAP participants provided information about participant perspectives and experiences with the requirement. In-depth interviews were conducted with 202 SNAP participants across the eight study States.
- Administrative data collected from SNAP and/or child support programs in the study States provided information needed for point-in-time estimates and an interrupted time series analysis of the associated effects of cooperation on participant outcomes.
- Administrative data and cost workbooks collected in one study State provided information to assess the associated costs and net benefits of the cooperation requirement. Additional qualitative information about costs based on site visit interviews was collected to provide added context.

1.6. Organization of Report

The remainder of this report is organized as follows:

- Chapter 2 presents findings from the site visits. It describes background information on each of the eight study States and the policy and operational environments of their SNAP and child support programs related to the implementation of cooperation requirements. Chapter 2 addresses study objectives 1, 2, 3, and 4.
- Chapter 3 presents findings from the analysis of administrative data. It describes the methodological approach and available data in each State; characteristics of the population affected by cooperation requirements; and the outcomes, costs, and net benefits of implementing cooperation requirements in one State. Chapter 3 addresses study objectives 5 and 6.
- Chapter 4 describes lessons learned from the study and implications for States currently implementing cooperation requirements and for policymakers at the State and Federal level who may be considering cooperation requirements.
- Appendix A provides a description of the study State selection criteria and process. Appendices B and C provide additional descriptions, respectively, of the qualitative and quantitative methods used to conduct the study.
- State-specific profiles of each study State are included in a separate volume, including implementation considerations and experiences with the cooperation requirement in SNAP as well as quotes from in-depth interviews with SNAP participants on their views and experiences with the requirement.

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Chapter 2 Cooperation Requirement Policy Features, Implementation Experiences, and Considerations

This study examines how a mix of eight States (Arkansas, Idaho, Kansas, Michigan, Mississippi, Ohio, Tennessee, and West Virginia) have approached the option to apply the child support cooperation requirement in SNAP. Of these eight States, five required child support cooperation for SNAP participants in 2019 and three did not.





Exhibit 2.1. Overview of findings from cooperation requirement implementation analysis

- Five study States (Arkansas, Kansas, Idaho, Michigan, and Mississippi) required cooperation with child support at the time of the study. Child support and SNAP staff interviewed from these States indicated that cooperation requirements were intended to connect families to an important source of financial support and promote parental responsibility. Many staff noted potential drawbacks of cooperation requirements, including a concern that cooperation requirements could deter otherwise eligible individuals from seeking public assistance and have a negative impact on relationship between custodial and noncustodial parents.
- Three study States (West Virginia, Ohio, Tennessee) did not require cooperation at the time of the study. Respondents from these States noted that enhancements to their data systems needed to facilitate implementation would be prohibitively expensive. Respondents from these States also noted concerns about increased burden on staff.
- Study States that require cooperation vary in how cooperation requirements are operationalized.
 - All study states require custodial parents to cooperate with child support but two require noncustodial parents to do so as well.
 - Study States vary in what activities constitute cooperation and the time frame in which parents must complete those activities.
 - All study States sanction the noncooperating parent's portion of the SNAP benefit as a consequence for noncooperation.
 - All study States have exemptions from the cooperation requirement if the parent meets good cause exemption criteria for not cooperating. However, the allowable reasons for the exemption, the approach to communicating the good cause exemption policy, and the type and amount of documentation to support a good cause claim varies across study States.
- The process by which the policy is implemented is fairly standard across study States and includes processes for identifying families in need of child support services, mechanisms for referring cases from SNAP to child support, and ways for child support to communicate cooperation status back to SNAP.
- Aligning cooperation requirement processes in SNAP with other assistance programs, having direct contacts between SNAP and child support agencies, and having an automated exchange of information across data systems all facilitate implementation.
- Staff uncertainty and confusion about policies and procedures as well as incomplete and inaccurate referrals of cases to child support create implementation challenges. ▲

2.1. Overview of Study States and Status of Cooperation Requirement Implementation

The study States were at different stages of implementation of the cooperation requirement in SNAP, ranging from never implemented to full implementation (Exhibit 2.2).

Exhibit 2.2. Cooperation requirement implementation status of study States

Implementation Phase	SNAP Cooperation Requirement Status	Study States	Description of Implementation at Time of Study
 Never implemented	States that <u>do not</u> currently require cooperation	OH, TN	In Ohio and Tennessee, legislators proposed bills to require child support cooperation in SNAP. However, following provision of fiscal notes that detailed the estimated financial impact of the requirement, neither State passed the proposed legislation. At the time of this study, Ohio and Tennessee did not have a cooperation requirement nor did they have any future plans to require cooperation.
 Planning for implementation		WV	In West Virginia, legislation to require child support cooperation was proposed in 2019 but was not acted upon. In response to perceived growing interest to require cooperation, SNAP and child support program leadership decided to implement cooperation requirements through administrative rule changes. At the time of this study, the SNAP and child support programs were planning for implementation. Staff expected the administrative policy to be rolled out in 2024, following completion of data system updates necessary to facilitate implementation.
 Early implementation	States that currently require cooperation	AR	Arkansas passed legislation for the cooperation requirement in 2018 and was preparing for a full rollout of the policy change in early 2020. Because of the COVID-19 pandemic, enforcement of the cooperation requirement was paused until 2021. At the time of this study, Arkansas was only one year into implementation and thus was considered to be in an early implementation phase.
 Full implementation		KS, ID, MI, MS	At the time of this study, Idaho, Kansas, Michigan, and Mississippi had implemented the cooperation requirement for more than five years. Idaho, Michigan, and Mississippi have required cooperation since the mid-1990s, and Kansas has required cooperation since the mid-2010s.

The study States that considered but did not implement the requirement (Ohio and Tennessee) provide an opportunity to better understand structural and contextual considerations and barriers that might prevent other States from adopting or implementing the requirement. Study States with several years and even decades of experience implementing the cooperation requirement in SNAP (Idaho, Kansas, Michigan, and Mississippi) provide the opportunity to explore factors that have supported long-term implementation and persistent implementation

challenges.¹⁷ The study sample also includes States engaged in the planning (West Virginia) and early implementation (Arkansas) of this requirement to ensure the study captures the perspectives of staff who are engaged in those initial activities that are critical to fully understanding the implementation of a requirement.¹⁸

The remainder of this chapter is organized as follows: Section 2.2 describes the motivation for and concerns about implementing the cooperation requirement; Section 2.3 provides greater detail about the cooperation requirement policy components and describes the processes and procedures of implementing the requirement, including how each State that currently requires cooperation operationalized the components; Section 2.4 describes the barriers and facilitators that States encounter throughout implementation, and Section 2.5 presents participant perceptions and experiences related to the cooperation requirement.

2.2. Exercising the Cooperation Requirement Option in SNAP: Key Motivations and Concerns

Although the child support cooperation requirement is mandated by Federal law for recipients of TANF and Medicaid, States have the option of requiring cooperation for SNAP. This section describes the views of child support and SNAP staff on what motivates policymakers to consider supporting this option and what the cooperation requirement is intended to accomplish. It next describes pragmatic administrative concerns regarding the feasibility of implementing this type of requirement in study States that have relatively recently considered supporting its adoption. Finally, it details concerns about the potential risks and negative consequences that such a requirement presents for SNAP participants, expressed by child support and SNAP staff across all study States—both those with and without the requirement.

Motivation and Rationale for Implementing the Cooperation Requirement in SNAP

Child support and SNAP staff described a common set of goals that policymakers sought to achieve through their support and adoption of a cooperation requirement in SNAP:

- Connect families to the child support program who would otherwise not engage in the program or benefit from its services.
- Increase financial resources and economic stability for the custodial parent and their children as a result of child support payments.
- Promote increased accountability and responsibility among noncustodial parents to provide financial support for their children.

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“I think the motivation [for the cooperation requirement] was that parents should pay for the support of their child. And [my State] is going to do all they can to make sure both parents are contributing as much as possible to limit the dependency on government welfare.”

—State child support leader

¹⁷ Since 1996, Idaho has referred SNAP cases subject to the cooperation requirement to the child support program but has not always enforced these referrals with sanctions for noncooperation.

¹⁸ Implementation of new policies or programs is a fluid process that takes place over time and consists of multiple phases. The National Implementation Research Network (NIRN) created a developmental framework that characterizes these phases and informed the study design. More information is at: <https://nirn.fpg.unc.edu/module-4>.

As an example, one child support staff member said the following:

A lot of [single parents] don't even know about [the] child support process, and [the cooperation requirement] helps them to come in and get the process started to get them some help because, especially in this economy, they need some help.... We can go ahead and try to get them extra income.... That's the benefit.

Regarding the motivation for adopting the policy requirement, one SNAP staff member said that legislators' support for a cooperation requirement reflected their belief that "it's time for a change, it's time for accountability, it's time for someone else to step up and take on some of the burden of having to take care of these kids."

Implementation Feasibility Concerns

Among study States that considered but ultimately opted not to adopt a cooperation requirement (Ohio and Tennessee), the financial resources and administrative complexity of implementing such a requirement was a major source of concern. These concerns primarily focused on cost-prohibitive data system modifications and the staff burden associated with implementation.

- **Cost-prohibitive data system modifications.**

Many staff from the child support program and SNAP emphasized that their programs' data systems would require complicated system modifications in order to install the cross-system interfaces necessary for implementation. For example, the SNAP and child support data systems typically do not have the ability to send automated referrals between the programs. Estimates of the costs of making data system updates provided by staff ranged from \$400,000 to \$5 million. Regarding the data system upgrade needs, one State-level child support program leader said, "Given the fact that the two programs [SNAP and child support] were operating on antique mainframe systems ... the implementation process would have been both astronomically expensive and not very feasible as far as getting it to work properly."

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"We don't have our [data] system currently designed to have that interface [with the SNAP data system].... We just had concerns as to what it would mean for our program as it would be difficult for us to implement."

—State child support leader

- **Staff burden associated with implementation.** Both SNAP and child support staff expressed concerns about the additional staff burden associated with developing and coordinating new policies and procedures, training staff, and monitoring implementation of a requirement. Child support program staff were also concerned about staff capacity for handling an influx of child support cases. Although some SNAP participants are already connected to the child support program, either voluntarily or through their participation in other assistance programs such as TANF or Medicaid, staff anticipated that introducing a cooperation requirement in SNAP would lead to many new referrals to child support. One State estimated approximately 150,000 new child support cases as a result of the cooperation requirement, which would require hiring up to 226 new child support staff members. Regarding their program's capacity to handle new cases, a State-level child support staff reported the following:

To me, this is very similar to when Medicaid-only cases were required to be referred. And we just constantly were getting them, they weren't cooperating, we were reporting [noncooperation status], and then we were shutting them down.... That takes time and it takes work and it takes notices and it takes a lot of resources.

Reservations and Concerns Over Risks to Participants

Despite general support for the overarching policy goals of a cooperation requirement, many child support and SNAP staff expressed reservations about its potential to cause unintended, negative impacts on the lives of families. These concerns included the following:

- **SNAP-eligible households could be deterred from applying for assistance.** SNAP and child support staff suggested that at least some individuals are deterred from applying for SNAP because of the cooperation requirement for various reasons, ranging from personal safety concerns to simply not wanting to engage in another bureaucratic system. For example, drawing on their experience with the Medicaid cooperation requirement, a State-level child support staff noted the following:

We were looking at a history in [the State] of when the Affordable Care Act expansion happened.... We received referrals [from Medicaid] that could potentially have been valid, but the person was so unwilling to cooperate that they basically backed off of Medicaid, threw themselves and their child back off the Medicaid rather than cooperate. And of course, we didn't know whether that was because of domestic violence or other reasons. We just didn't know. But it was a history very recently of having forced cooperation by the obligees [custodial parents], the caretakers, resulting in people just walking away from benefits for their children.

- **Cooperation requirements may not increase formal child support collections and may disrupt informal child support agreements.**

Child support program staff expressed concern that the financial resources of the noncustodial parents linked to the custodial parents subject to the cooperation requirement are typically quite low. Therefore, the effort and cost involved in working these cases might not lead to an increase in economic well-being for the custodial family. One child support program staff member described how noncustodial parents receiving SNAP may not have the ability to pay child support as follows:



"They need the services in their home and they certainly qualify, but they don't want additional government in their family life. And I hear that a lot, 'I don't need this, I don't need that, we're going to do it on our own,' kind of thing. And the mandatory things that we need to do—sometimes it's cumbersome to that family."

—Child support worker



"You do see families suffer that you feel like really need the benefits.... It's individuals like those destitute households, where it's one individual and they're homeless and you just want to help them somehow and you can't, because they don't want to cooperate [with child support] for whatever reason. A lot of the times they're just scared, because it's a scary process."

—SNAP worker

I think some people can hear the concept and say, 'Well that makes sense.... You shouldn't be allowed to get SNAP benefits if you're not paying your child support.' But for those of us who have been in human services for so long, I know what the eligibility requirements are for someone to receive those benefits. You have to be very low income in the first place. So you were probably already struggling to or might be struggling to pay your child support if you are eligible to receive SNAP benefits.

- **Involvement in child support could negatively impact relationships or compromise participants' safety.** Staff recognized that a downside of requiring cooperation with the child support program is that it could disrupt familial and relationship dynamics or conflict with existing co-parenting arrangements. For example, a SNAP worker described how child support involvement risked the dissolution of the relationship between a noncustodial parent and their child:

There are some unfortunately absent parents that it would break the relationship with the child if all of the sudden he were forced to pay child support. That there are situations I think sometimes that we are not aware of. And I think we run the risk of jeopardizing that parent-child relationship once we start legislating that that absent parent is going to pay an X percentage. That's not to say, I don't believe the parent... should [not] pay for that child, but I think there is an unintended consequence to this [cooperation requirement].

Relatedly, a child support staff member in a study State that did not have a cooperation requirement expressed concern about their inability to detect and protect against domestic violence if the participant does not disclose it to their caseworker: "Are people now going to start making decisions whether or not they're going to have food, because they don't want to pursue child support, because maybe the person is a violent person? We don't know, obviously." Studies of individuals subject to TANF cooperation requirements may demonstrate how these concerns can play out for other cooperation requirements. Many victims of domestic violence have said they chose not to disclose their abuse to TANF caseworkers, citing concerns of experiencing judgment, losing their children, or facing additional application hurdles (Postmus, 2004). One study of TANF recipients who were involved with the child welfare system found that only 1 in 5 potential victims of domestic violence disclosed their experiences to their TANF caseworkers and that some subgroups, such as African American women, were even less likely to disclose their experiences (Hetling, Saunders, & Born, 2006).

2.3. Cooperation Requirement Policy and Process

The child support cooperation requirement includes several policy components, and States vary in how they operationalize them. In part, this is because State legislation establishing the requirement is often vague, leaving it to State agencies to define the parameters of the policy, including whom it applies to, how the penalty for noncooperating parents will be calculated, and the process for making a good cause exemption determination. This section describes key features of these components and the general cooperation requirement process, including variations in the process across the study States.

Overview of Cooperation Requirement Policy Components

- **Who is subject to the cooperation requirement.** All study States that implement the cooperation requirement apply it to custodial parents and guardians with legal custody. Among the study States that have adopted a cooperation requirement policy, Arkansas and Mississippi also apply the cooperation requirement to noncustodial parents.¹⁹ States may also elect to apply the cooperation requirement to other nonparental caregivers who are applying for SNAP, such as grandparents or other family members, as well as caregivers who are not related to the child.²⁰
- **What constitutes cooperation.** There is variation in how SNAP and child support agencies specify what someone subject to the cooperation requirement must do to be considered “cooperating” but it generally requires the parent to assist the child support agency in establishing paternity and establishing, modifying, or enforcing a support order. Most commonly cooperation entails providing information about the noncustodial parent and their location, attending court hearings related to paternity and/or order establishment, providing requested information or documentation needed by the child support agency to process the case, and submitting to genetic testing to determine paternity of the child.
- **The time frame in which cooperation must be determined.** States specify timeframes for when different actions leading to a determination of cooperation status must take place. For SNAP cases in which the head of household does not already have an existing cooperation status determination, the SNAP worker calculates and authorizes the full household benefit and refers the individual to the child support program.²¹ For SNAP cases in which there is an existing determination of noncooperation, the SNAP worker instructs the individual to work with the child support program to come into compliance within 10 days in order to receive the full household benefit. Until the child support program changes the cooperation status to that of being in cooperation, the household will receive a reduced benefit. State child support programs have their own time frames for how quickly a case must be opened after receiving a referral from SNAP. Child support programs establish policies for the timing and frequency of attempts by child support workers to contact individuals who were referred by SNAP.

¹⁹ In Kansas, the legislation mandating the SNAP cooperation requirement did not specify whether custodial parents, noncustodial parents, or both were required to cooperate with child support. However, the SNAP policy manual specifies that workers should refer only custodial parents to child support for cooperation. The child support program can request that noncustodial parents receiving SNAP who have failed to pay child support, return paperwork, or comply with genetic testing may be held in noncooperation. However, child support rarely exercises this ability and program leadership has developed policy guidance encouraging workers to avoid using this as a way to encourage compliance with the child support.

²⁰ Throughout the report we include nonparental caregivers when referring to parents who are required to cooperate with child support.

²¹ Individuals applying for SNAP may already have a cooperation determination. Individuals may already be required to cooperate with child support due to TANF or Medicaid participation or receipt of child care subsidies. Individuals recertifying their SNAP benefits may have an existing noncooperation status from a previous certification period.

- **The consequence, in the form of sanctions, of noncooperation.** When a parent does not cooperate with the child support program, States sanction their SNAP benefits. In all study States, the SNAP agency removes the noncooperating parent's income from the calculation of the SNAP household's monthly benefit, thereby altering the total household benefit allotment. The aim of this partial sanction is to avoid penalizing children for their parent's lack of cooperation.

- **Exemptions from the cooperation requirement for good cause.** SNAP and child support agencies must exempt parents from the cooperation requirement if there is reason to believe that cooperating would put the parent or their child(ren) in danger. All States have policies to grant good cause exemptions in cases of rape and domestic violence. States may also consider noncustodial parent incarceration, a deceased noncustodial parent, pending adoption proceedings, or when the custodial parent does not know who the noncustodial parent is as other reasons to receive a good cause exemption. In all study States except for Mississippi, primary responsibility for a good cause exemption determination rests with the SNAP agency. In Mississippi, the child support agency has primary responsibility for good cause exemption determinations. In the study States, if a parent discloses a good cause reason to a child support worker, the worker may suggest that the parent get in touch with SNAP to pursue a good cause exemption determination. Study States vary in the type of evidence and the standard of proof that is required to support a claim of good cause. Additional protections are also available through the child support program (see Exhibit 2.3).

Exhibit 2.3. Child support protections from family violence

All child support programs are expected to screen for family violence to ensure that families can receive child support services safely, regardless of participation in other assistance programs. When parents have reason to fear violence, the child support program can add confidentiality protections so that the other parent does not get access to the participating parents' home address. When child support staff screen for family violence, parents may disclose information that would make them eligible for a good cause exemption from the cooperation requirement. In these cases, in most study States, the child support worker could, but is not required to, suggest to the parent that they should share this information with their SNAP worker as they may be exempt from the cooperation requirement. ▲

Exhibit 2.4. Policy alignment of cooperation requirements across multiple assistance programs

Families with low incomes often participate in more than one public assistance program that requires cooperation with the child support program as a condition of eligibility. TANF and Medicaid cooperation requirements are mandated by Federal policy, and the cooperation requirement in SNAP and subsidized child care are optional for States. Five of the study States use this option and require cooperation with child support in SNAP, TANF, Medicaid, and subsidized child care. Importantly, only SNAP is given the option under Federal Law to apply the cooperation requirement to custodial parents *and* noncustodial parents. The alignment—or lack thereof—among cooperation requirements for assistance programs has led to confusion among some SNAP participants in the study who received benefits from multiple programs. These participants did not know about or differentiate between the implementation of cooperation requirements in one program versus another. Rather, they saw the requirement as a single policy spanning multiple programs.







- ✔ **Actions required for cooperation align across programs.** States define the actions required for cooperation. All study States that require cooperation with SNAP defined the actions that constitute cooperation in SNAP to match the actions that constitute cooperation in their other benefit programs.
- ✔ **Cooperation status is applied across programs.** States have the option to apply the cooperation status determined for one assistance program to all assistance programs, referred to as comparable disqualification. All study States exercise this policy provision.
- ✔ **Good cause exemption determination applied across programs.** All study States apply good cause exemptions determined for one assistance program to all assistance programs. That is, if a parent receives a good cause exemption from TANF or Medicaid, that good cause exemption applies to SNAP. States may vary as to which agency has responsibility for making the good cause determination. In all study States except Mississippi the responsibility for good cause determination rests with the SNAP agency. In Mississippi, the child support agency is responsible for making a good cause determination.
- ✘ **Sanction penalties imposed for noncooperation are not aligned.** All study States apply one type of sanction for noncooperation for the TANF and child care programs and another type for SNAP and Medicaid programs. If a family receiving TANF or child care is found in noncooperation with child support, the entire family benefit is closed until cooperation is determined.²² This is often referred to as a full family sanction. If a parent in a household receiving SNAP benefits or Medicaid is found in noncooperation with child support, only the noncooperating individual is removed from the household benefit. This is often referred to as a partial family sanction.
- ✘ **Benefits programs apply a different length of time that a sanction lasts.** Across study States, SNAP lifts sanctions within one month of establishment of cooperation, while TANF, Medicaid, and child care programs sanction families' benefits for longer periods of time.

²² Federal regulations require that States sanction TANF recipients for noncooperation by imposing a minimum 25 percent reduction in the amount of their benefit. Although all study States impose a full family sanction of TANF benefits for noncooperation, other States may apply partial sanctions.

How States Implement the Cooperation Requirement in SNAP

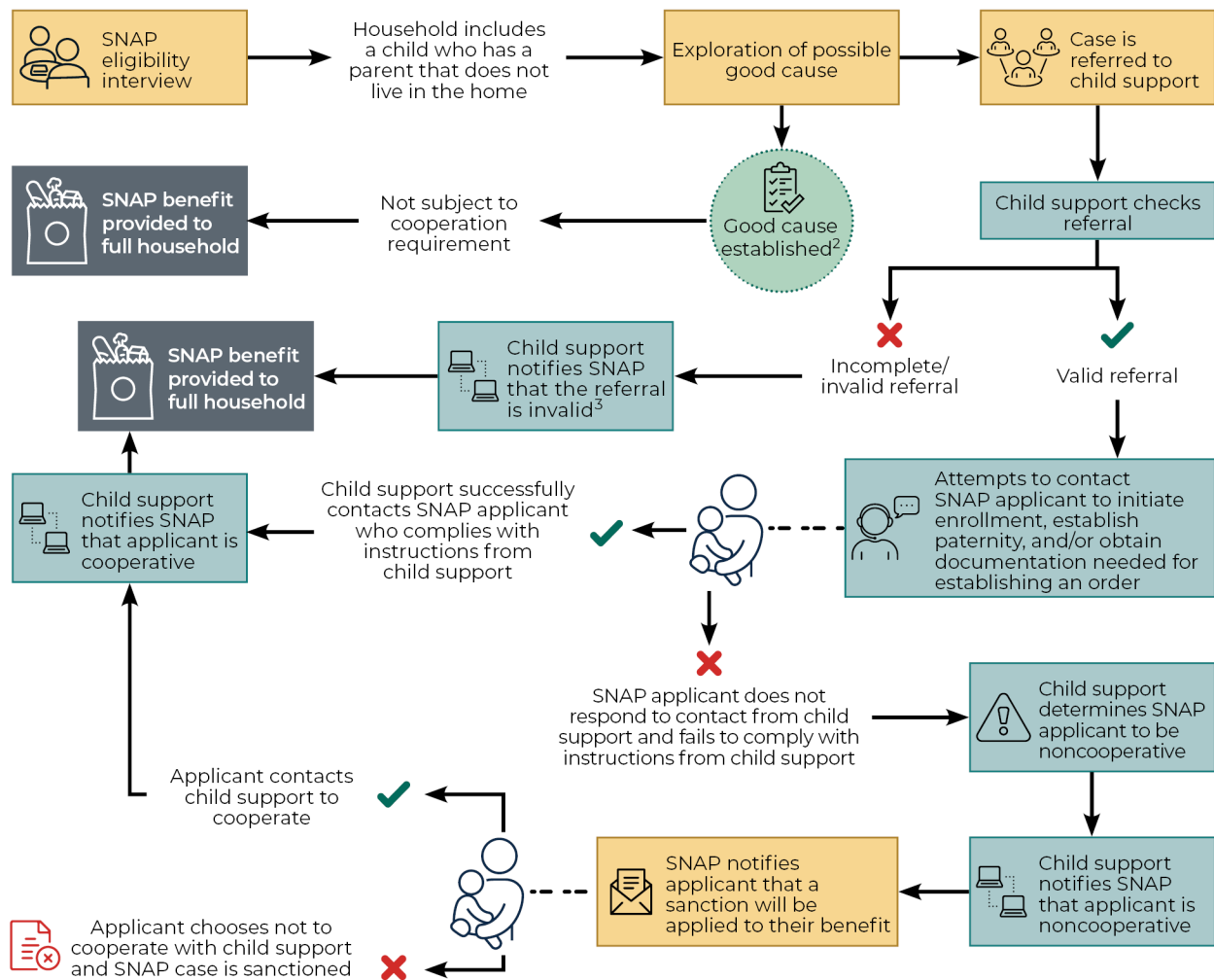
Despite some variation in how study States operationalize the cooperation requirement’s policy components, the process by which the policy is implemented is fairly standard across study States. As illustrated in Exhibit 2.5, the general process study States use to implement the requirement includes several steps. At any point in this process, an individual may be exempted from the cooperation requirement for good cause. Exhibit 2.6 provides a flow chart of that process, as described by State and local level staff, for households in which the head of the household is a single custodial parent applying for assistance for themselves or on behalf of their children. The narrative below provides more details about variation in the process in instances in which descriptions of the process varied by individual respondents within and across study States.

Exhibit 2.5. Key steps in the cooperation requirement process

	<p>Identification. When a parent applies for SNAP benefits, a SNAP worker identifies whether the parent is subject to the cooperation requirement. If the parent is subject to the requirement, the worker informs them about the requirement. A similar review is conducted as part of the recertification process.</p>
	<p>Cross-agency communication touchpoint: SNAP’s notification to child support. Next, the SNAP agency refers the parent to the child support agency for cooperation. This is typically accomplished through an automated system interface.</p>
	<p>Determination of cooperation. The child support agency attempts to enroll and engage the parent in child support services and subsequently determines whether the parent is cooperating.</p>
	<p>Cross-agency communication touchpoint: Child support’s feedback to SNAP agency. The child support agency notifies the SNAP agency with its cooperation status determination. This is typically accomplished through an automated system interface.</p>
	<p>Sanction for noncooperation. If the parent is not cooperating with the requirement, the SNAP agency sends a notification to the parent that a sanction for noncooperation that removes their portion of the SNAP household benefit will go into effect within a specified time frame if they do not establish cooperation with the child support agency.</p>
	<p>Good cause determination. At any point in this process, SNAP agency staff may approve an exemption from the cooperation requirement for good cause if the custodial parent meets the exemption criteria, along with required documentation of proof.</p>

Interviews with child support and SNAP staff, as well as with SNAP participants, provide details and insights into how the process of implementing the cooperation requirement works in practice. The following sections draw on these interviews to describe, in greater depth, how the cooperation requirement process works for custodial parents, as the requirement is most commonly applied to that population. A description of cooperation requirements among the study States that include noncustodial parents can be found in Exhibit 2.7.

Exhibit 2.6. Child support cooperation requirement process flow¹



¹ This exhibit depicts the cooperation requirement process flow as described by State and local SNAP and child support staff across States. This exhibit depicts the general process for individuals without a prior cooperation determination as described by the majority of staff across programs and States. In four of the five study States that require cooperation, child support informs SNAP if the household is or is not in cooperation. In Idaho, child support only notifies SNAP of the cooperation status when they determine the household is not in cooperation with child support.

² In four of the five study States that require cooperation with SNAP, good cause exemption is determined by the SNAP program. In Mississippi, the child support program makes the good cause determination once child support has made initial contact with the custodial parent.

³ Child support staff may determine that a case is inappropriate for services for several reasons including a deceased, deported, or incarcerated noncustodial parent or if the referred individual reports living in an intact two-parent household. If child support staff determine the referral is inappropriate for child support services, staff will notify the SNAP program. Notification of invalid referrals might occur through the integrated data systems or manually by email or phone call. SNAP staff will review the reasons that the referral is invalid. Depending on the reason the referral is invalid, SNAP staff might contact the applying parent for updated information and could refer the case back to child support. If the applying parent should not have been subjected to the cooperation requirement, the SNAP staff will provide benefits to the full household.

Identification

The first step in implementing the cooperation requirement for custodial parents is to identify those applicants who are subject to it; that is, parents or guardians with a child who lives with them and has a noncustodial parent and are not already cooperating with child support.²³

Custodial parents are identified as being subject to the cooperation requirement during the initial SNAP application interview. The SNAP application includes questions about household composition that are used to determine whether someone meets criteria for the cooperation requirement. Even if a custodial parent is not subject to the requirement when they first apply for SNAP, changes to the household composition that are reported at any point (most commonly in an interview with a SNAP worker or during the recertification process) may trigger a referral to the child support agency requiring cooperation.

States must also include information about the cooperation requirement in the application for benefits; SNAP administrators and workers in several States noted that their applications described the cooperation requirement. In Kansas, SNAP workers also send a cover letter to applicants with information about the program and a description of the cooperation requirement. This letter is accompanied by a disclosure form that applicants must sign. In addition to informing SNAP applicants about the cooperation requirement in eligibility and recertification interviews, Idaho requires applicants to listen to a recording describing their rights and responsibilities; this recording includes information about the cooperation requirement. This recording is available in English and Spanish. Interpreter services are available to applicants who speak languages other than English or Spanish.

Most SNAP workers bring up the cooperation requirement while discussing the applicant's household composition during an eligibility interview. When asking about children in the household, a SNAP worker identifies whether those children have parents living outside the house. If so, this prompts the SNAP worker to describe the cooperation requirement and ask further questions about the noncustodial parent. Some SNAP workers also described approaching the discussion of the cooperation requirement by asking about income and specifically probing on whether the applicant receives child support. SNAP workers will also check their data system to see if a cooperation status has already been entered for the applicant (for example, if the applicant is also receiving TANF the applicant may already be in cooperation with child support). If the applicant is already determined to be in cooperation with child support, the full family benefit is provided and there is no referral to child support. If the applicant is not in cooperation at the time of application, the case can be opened for a partial family benefit (the household benefit calculated without the noncooperating parent) and the SNAP worker will instruct the applicant to work with the child support program to get into cooperation. If the applicant does not have a cooperation determination, the applicant will be referred to child support and the full family benefit will be provided until child support makes a cooperation determination.

²³ Individuals who participate in TANF may already be in cooperation with child support as a condition of their TANF eligibility. Individuals who are recertifying their SNAP eligibility may also already have cooperation status determined when they had originally applied for benefits.

In instances where the custodial parent is hesitant to provide information, SNAP workers emphasized the importance of handling these conversations with sensitivity. One SNAP worker described that they try to ease applicants into providing the required information as part of the application interview by starting with broader, less invasive questions and gradually getting more specific. This worker also acknowledged that the terms used during eligibility and recertification interviews can be important for avoiding putting applicants on the defensive. For example, the term “absent parent” might spark a negative reaction, so this worker would instead choose to say “the other parent” or if applicable, “the father.” One child support worker said that they had received extensive training to improve their ability to obtain information about the noncustodial parent so that the parent applying for SNAP felt comfortable providing those details and that they were posing questions in a “respectful and comforting kind of way so that maybe [the parents] would feel more forthcoming.”

Exhibit 2.7. Cooperation requirement policies that apply to noncustodial parents

SNAP is the only program that may apply, at State option, a child support cooperation requirement to noncustodial parents.

In **Mississippi** and **Arkansas**, the legislation that mandates cooperation with child support specifies that both custodial and noncustodial parents are required to cooperate with child support as a condition of eligibility. The cooperation policy requirement in these States requires that noncustodial parents applying for SNAP as a household without dependent children must provide adequate and accurate information on their income to the child support agency or the courts and pay any past due child support that the courts identify. Typically, if the noncustodial parent is making a good faith effort to pay child support and is cooperating with any other requests to move the case forward, such as attending court hearings, they will be determined to be in cooperation. All other policies and procedures that apply to implementation of the requirement for custodial parents are applied to noncustodial parents, as well. Interviews with program staff suggest that the policy is rarely applied to noncustodial parents in practice. Interpretation of this policy- how it should be applied and under what circumstances-varied considerably.

West Virginia is the only study State with plans to implement a cooperation requirement that only applies to noncustodial parents. Program leaders were concerned that a cooperation requirement for custodial parents would unfairly punish custodial parents for a noncustodial parent’s unwillingness to engage with child support but also wanted to increase the economic supports available to custodial households. The proposed policy requires SNAP to refer individuals who are subject to the able-bodied adult without dependents (ABAWD) work requirement in SNAP who are also noncustodial parents and owe more than \$5 in back child support. Staff anticipate that the requirement would not apply to those who are deemed disabled, unable to work, or in a drug or alcohol treatment program. To be considered in cooperation with child support, noncustodial parents must pay their child support for six consecutive months. If, at any point, the noncustodial parent does not pay their legally established monthly child support obligation, they can be determined to be not in cooperation with child support.

In **Kansas**, SNAP does not refer noncustodial parents to child support for cooperation as a condition of SNAP eligibility. However, the child support program can request that noncustodial parents receiving SNAP who have failed to pay child support, return paperwork, or comply with genetic testing may be sanctioned by SNAP for noncooperation with child support. Kansas child support leadership explained that child support staff rarely make this request and that program leadership has developed policy guidance encouraging workers to avoid using this as a way to encourage compliance with child support. ▲

Communication Touchpoint: SNAP's Notification of Child Support

Once an applicant is identified as being subject to the cooperation requirement, the SNAP agency transmits that information to the child support agency for cooperation determination. SNAP and child support agencies used a variety of methods to communicate with each other, ranging from highly automated approaches to person-to-person communication via phone calls and emails.

All study States automatically generate referrals from the SNAP management information system (MIS) to the child support agency's MIS when SNAP workers identify a parent as subject to the cooperation requirement. The programs' systems share information about the parents collected by SNAP with the child support system; this can include the SNAP applicant's contact information and any information collected on the noncustodial parent. In most study States, referrals are transmitted from SNAP to child support in nightly batches. Although some staff noted that it would be helpful if additional information was shared through the data system interface, child support staff generally described receiving sufficient data from the SNAP system to proceed with working a case. SNAP staff also reported that, when data systems don't share sufficient information, it is even more important to have good working relationships with staff in the child support agency to help answer questions.

Across the study States with cooperation requirements, regardless of the extent to which their data systems interface, it is common for SNAP and child support workers to make telephone calls or send emails to discuss issues or ask questions about cases. Generally, staff from local child support and SNAP offices across study States reported having contact information for the worker working in parallel on each case. However, in some study States, SNAP workers who did not have a direct contact in the child support program would have to call the main child support telephone number and wait in a queue to speak with a representative.

Determination of Cooperation

Once the child support agency receives a referral from SNAP, the process of determining cooperation involves several steps, including validation of the referral, outreach to the custodial parent, and ongoing cooperation.

Validating the referral. Upon receiving a referral from the SNAP agency, a child support worker checks several criteria and will take the corresponding subsequent actions:

- Does the referral include enough information to contact the custodial parent? If not, a child support worker will have to contact SNAP and request additional information before being able to move forward.
- Does the custodial parent applying for SNAP benefits already have an open and active child support case? If so, the child support worker will check the most recent activity on the case and update the cooperation status accordingly.
- Does the custodial parent applying for SNAP benefits already have a private child support order through a private divorce hearing? If so, the child support worker will check that this

order aligns with child support guidelines and work to get child support payments rerouted through the child support disbursement unit.

- Are there other circumstances that would make the household ineligible for child support services? For example, is the other parent a refugee, parolee, deceased, deported or, in some States, incarcerated? Is the custodial parent applying for SNAP as an asylee and the other parent is unable to join the family in the United States due to circumstances beyond their control? If so, the household is not eligible for child support services. In cases such as these, the child support worker will not work on the case and may alert SNAP that the referral was invalid.

If there is enough information available and the referral is appropriate for services, the child support workers begin contacting the custodial parent to open a child support case.

Outreach. The first action taken by child support to open a child support case is to mail a notification letter and enrollment package to the custodial parent applying for SNAP benefits, informing them of the requirement to cooperate with child support. The initial package may include information about establishing parentage, what is needed for the State to open a child support case, enrollment forms, and the number of days the custodial parent has to cooperate with the request before being determined noncooperative. Most study States require child support workers to make multiple attempts at obtaining the information needed to open a child support case following notification of the custodial parent. The number of attempts varies across States. For instance, Kansas child support workers must make at least three follow-up contacts and mail multiple enrollment packages before making a cooperation determination. Meanwhile, Idaho child support workers are required to send one letter and make two phone calls before making a cooperation determination.

Child support staff describe that this is the most common juncture at which cooperation is determined. If a custodial parent does not respond to the initial notification within the specified time frame, then they are determined to be in noncooperation. If a custodial parent does respond at this point, they are likely to continue cooperating with other required activities throughout the remainder of the child support process.

Ongoing cooperation. In addition to responding to the child support agency's outreach, to be in cooperation, custodial parents must also participate in determining paternity for their child(ren) and establishing a child support order. Establishing paternity can include submitting to genetic testing or attending court hearings. Custodial parents must also provide information on the identity and whereabouts of the noncustodial parent. This information is used to locate the noncustodial parent to finalize the child support order. If the custodial parent does not

Exhibit 2.8. SNAP administrative review hearings

Parents who feel their cooperation status has been wrongly determined can request an administrative hearing to review the cooperation determination. This option is available in all study States. State policy manuals specify the time frames in which administrative hearings must be requested following a cooperation determination. Staff report that very few administrative hearings are requested. ▲

provide adequate information to the child support worker to open a child support case, the custodial parent will be considered noncooperative. What constitutes “adequate information” varies by State procedures and often depends on the perceptions of workers. For instance, some study States will not penalize custodial parents who report that they do not know the identity of or do not have relevant information about noncustodial parents, whereas other study States view this as noncooperation.

Once a child support worker determines that a custodial parent is not cooperating, they will send the parent a letter warning of this impending designation. The letter explains that the parents have a specified number of days to respond to the child support agency’s requests before the case is closed by child support, which may result in a sanction from SNAP.



Exhibit 2.9. Participant reflections on their knowledge of the cooperation requirement

Interview participants in study States that require cooperation reported learning about the requirement at various points in time and from various sources.

Prior to application. Few participants indicated they knew about the SNAP cooperation requirement prior to application. Some explained that they knew of the cooperation requirement from friends or family members or had heard about it from others in their community. A few recalled learning about the SNAP cooperation requirement during the application process for another program (such as TANF), and some were familiar with it because of their experiences pursuing benefits in other States that have a similar cooperation requirement.

At SNAP application. Many participants who knew about the cooperation requirement first learned about it at the time of application. They were informed about the cooperation requirement when they completed the application paperwork, at the eligibility interview, through other conversations with a worker, or via other forms of communication during the SNAP application interview and follow-up.

Upon receiving a notice about their cooperation status. A few participants didn’t know about the cooperation requirement until they received a notification about a sanction for noncooperation from the SNAP agency. These participants frequently described receiving letters saying they were not cooperating and reported difficulty knowing whether they needed to contact the child support office or SNAP to get back into compliance. Others recalled seeing paperwork that asked for information on the noncustodial parent but explained that they were not told about the consequences of choosing not to share such information. ▲

Communication Touchpoint: Child Support’s Feedback to SNAP Agency

The data systems used by both programs allow for the cooperation status entered by child support workers in the child support data system to automatically update the cooperation status in the SNAP data system. This update is typically done via a nightly batch update, as referrals come to child support nightly. Staff in most States reported relying on this automatic updating of the system and did not describe manual procedures for child support to contact SNAP about the cooperation status. However, in Kansas, child support staff described sending an email directly to SNAP in addition to expecting an automated update in the data system. In Idaho, child support staff e-mail a specific inbox when an applicant is determined to be noncooperating. This inbox is monitored by a specialty team of SNAP workers who are

responsible for reviewing noncooperation status cases. These staff review the cases to determine if there is good cause for the noncooperation and, if there is not, are responsible for reaching out to the applicants to inform them of the potential sanction. Idaho uses this specialty team approach to reduce the number of SNAP workers with discretion about sanction decisions for noncooperation cases.

Sanction for Noncooperation

When a SNAP applicant is determined to be noncooperative with child support, the SNAP agency removes the noncooperative adult from the household benefit until the applicant takes the steps needed to establish cooperation.

- **SNAP notifying the participant.** Upon receiving the cooperation determination from the child support agency, the SNAP agency sends a letter to the noncooperating parent warning that they are subject to a sanction that will disqualify them from receiving their benefit if they do not cooperate with the child support agency within the specified timeframe. The letter also includes the new benefit amount for the household with the sanction applied.

Noncooperating parents may have up to 30 days to cooperate before the sanction goes into effect, though the amount of time varies by State and may depend on the day of the month that the determination of noncooperation was made.²⁴

- **Applying the sanction.** SNAP workers explained that although the sanction typically reduced the total amount of the SNAP household benefit, the financial consequence of the sanction for noncooperation on the SNAP total household benefit amount varied. These implications range from disqualifying the household from eligibility to, in some cases, increasing the household's SNAP benefit. In most States, the amount of the adjusted benefit is calculated by reducing the household size by 1 (that is, removing the noncooperating parent) and subtracting the noncooperating person's income from the household total. For example, a noncooperating parent living with two minor children would see their household size decrease from three to two and the household income drop from \$12,000 per year to zero; the household would receive a benefit for a two-person household with no income. Exhibit 2.10 presents example SNAP



"I think at first [participants] think altogether everybody's going to be saying they can't receive [any] benefits.... But then once I explained that the children must still get it, it's just going to affect you, then they're like, 'Okay, that's fine.' They're still not going cooperate. A lot of them do that."

—SNAP worker

²⁴ For example, if a SNAP recipient's benefits are sanctioned, they see a reduction in their benefit allotment beginning in the month after the sanction is applied. Sanctions can be lifted once applicants come into compliance. So, although a SNAP worker in a given State may tell an applicant that they have 10 days, according to policy, to come into compliance to avoid having their benefits sanctioned, a recipient who is sanctioned on the first of the month could come into compliance on the 15th of the month and experience no delay or lapse in receiving the full amount of their benefit. At least one State (Idaho) does not allow SNAP workers to make changes to cases within the last 10 days of the month, which can also affect timelines for when sanctions go into effect. If a sanction is applied during these 10 days, the State issues recalculated benefits in the month following the subsequent month (for example, if a sanction is applied on January 28, the benefit will not be affected until March).

benefit calculations to demonstrate how sanctions can change SNAP benefit amounts for households with a noncooperating parent.

Staff expressed varying views about sanctions for noncooperation. Some noted that the cooperation requirement for SNAP does not motivate cooperation to the same degree that making the entire household ineligible would.

A common perception among staff was that SNAP participants may choose not to comply with the requirement and have their portion of the benefit removed (“take the sanction”). Staff shared several reasons for participants to choose not to cooperate. Staff suggested that participants may be receiving support (financial or in-kind) from the other parent and cooperating with child support could disrupt their relationship with the other parent and any pre-existing informal agreement or arrangement that they have with the parent regarding providing support. Others thought that participants may simply not want to involve the government with their life or the noncustodial parent’s life.

As one SNAP worker said, “If they don’t really want to comply, they want to know why do they have to give the noncustodial parent’s information? Or they’ll tell us that person is helping take care of the child, they don’t want to put them on there [child support].” A child support worker in one study State noted another reason that participants did not want to cooperate was that doing so could put them at risk of receiving less support than they currently received. This worker explained that they had seen instances in which the noncustodial parent had agreed to provide a certain amount of money to the custodial parent informally, but once the child support program was involved and the child support guidelines were used to set the order amount, the amount the noncustodial parent was required to pay was less than what they had paid under their informal agreement. Other staff expressed concern that sanctions due to noncooperation could negatively impact a family’s well-being and that the negative impact felt misaligned with the goals of SNAP:

[If] you’ve got a parent and two or three kids and you take their parent’s SNAP away, you’re lowering the benefits they’re receiving. So even though you’re still giving the children SNAP benefits, you’re taking away from that household. So they don’t have as much [in their household benefit allotment] just because they don’t want to go to child support, for no telling what reason. Maybe they didn’t ever call the police and they’re scared of him or...they don’t have proof for good cause, but we’re gonna make them do this to give them food stamps. And I personally don’t think that it’s necessary. I think that they should not have the policy to do that, because the benefits should be there for that person too.

Section 2.5 describes reasons for noncooperation provided by participants interviewed for this study.

Re-establishing cooperation. SNAP and child support staff across study States reported little variation in the process for coming into compliance with child support after a noncooperation determination has been made. Before a SNAP worker can lift a sanction, the applicant must first contact the child support agency. Child support workers tend to pick up the case where it was

left at the time of the noncooperation determination. If the case was officially closed, the noncooperating parent may be required to repeat the necessary intake steps to initiate a new case. The child support worker may then indicate that the parent is in cooperation and communicate that information to the SNAP office, allowing the parent's benefits to be reinstated the following month. Parents do not receive the benefits they missed during the time they were determined to be noncooperative.

Exhibit 2.10. Examples of how a cooperation sanction can change a household's SNAP benefit amount

Although the intent of the sanction for noncooperation is to reduce the total benefit amount for the SNAP household, the following example calculations demonstrate how participants might experience an increase or a decrease in SNAP benefits, depending on their situation. Using the following formula, noncooperating parents with the lowest net incomes would see their benefits reduced by being sanctioned, whereas parents with net incomes closer to the maximum amount allowed by SNAP rules would see their benefits increase from sanctions. For more information on SNAP eligibility and benefit calculations, see [SNAP Eligibility | Food and Nutrition Service \(usda.gov\)](https://www.usda.gov/food-nutrition-service/snap-eligibility)

Basic formula for SNAP benefits: Because SNAP households are expected to spend about 30 percent of their resources on food, monthly benefits are calculated as follows*:

$$\text{Maximum allotment based on household size} - (\text{Monthly net income} \times 0.3)$$

Example 1: Family of 3 with a monthly net income of \$0

- *Formula before noncooperating parent is removed from case:*
 - \$766 maximum allotment for family of 3 – ($\$0 \times 0.3$) = \$766 per month in SNAP benefits
- *Formula after sanction:*
 - \$535 maximum allotment for a family of 2 – ($\$0 \times 0.3$) = \$535 per month in SNAP benefits



Family experiences a \$231 decrease in SNAP benefits following a sanction.

Example 2: Family of 3 with a monthly net income of \$1000

- *Formula before noncooperating parent is removed from case:*
 - \$766 maximum allotment for family of 3 – ($\$1,000 \times 0.3$) = \$466 per month in SNAP benefits
- *Formula after sanction:*
 - \$535 maximum allotment for family of 2 – ($\$0 \times 0.3$) = \$535 per month in SNAP benefits



Family experiences a \$69 increase in SNAP benefits following a sanction.

Example 3: Family of 3 with a monthly net income of \$500

- *Formula before noncooperating parent is removed from case:*
 - \$766 maximum allotment for a family of 3 – ($\$500 \times 0.3$) = \$616 per month in SNAP benefits
- *Formula after noncooperating parent is removed from case due to a sanction for noncooperation:*
 - \$535 maximum allotment for a family of 2 – ($\$0 \times 0.3$) = \$535 per month in SNAP benefits



Family experiences a \$81 decrease in SNAP benefits following a sanction.

*Note: This formula does not fully illustrate the SNAP eligibility and benefit calculation and is meant to be illustrative. ▲

Good Cause Determination

All States have provisions for exempting parents from cooperating with child support under certain circumstances, including if their case involves rape or incest or if cooperation could result in physical or emotional violence. In study States that require cooperation, except for Mississippi, a determination of good cause is made by the SNAP agency. Mississippi is the only study State where good cause exemptions are determined by the child support agency.

Across all study States, parents can request a good cause exemption at any time during the application process or while receiving benefits. Overall, the use of good cause exemptions is very limited and most workers reported having little to no experience with the good cause determination process. States vary in how they establish good cause for exemption from the cooperation requirement and in the practices they use to communicate about such exemptions.

Explaining good cause exemptions. In most study States, SNAP and child support forms include questions or guidance advising the parent receiving SNAP benefits to contact their SNAP or child support worker if they fear violence as a result of child support cooperation or otherwise qualify for a good cause exemption.

Staff reported different and sometimes conflicting information about good cause exemption policy, both within and across States. For instance, some workers in one study State reported that good cause exemptions were permanent, saying “Usually you verify it once. And then they had a reason enough to have good cause it just stays.” Other staff in the same State and agency described that good cause needed to be periodically reestablished: “I think every time they recertify.... Yeah, because sometimes that changes.”

SNAP workers sometimes provided conflicting responses about whether it was correct to ask about good cause directly in every interview, or to only bring it up if the worker had a reason to think there might be a need for a good cause exemption. Some SNAP workers explained that they were more likely to have a direct conversation about the possibility of a good cause exemption if the parent applying for SNAP benefits displayed discomfort or hesitancy to cooperate when discussing child support during an interview. For instance, some SNAP workers described how an applicant’s refusal or reluctance to share details about the noncustodial parent indicated to them that they should begin discussing a potential good cause exemption. However, the importance of maintaining a balance between probing about circumstances that might be grounds for seeking good cause and remaining neutral in their line of questioning was also noted. It was also suggested that conversations about domestic violence or other sensitive topics are difficult for workers to lead. For example, one SNAP supervisor shared the following:

I think that [domestic violence] is such a sensitive subject that some people are okay talking about and others are just completely not willing to go there and discuss it, because it can be triggering just to discuss. I think that there’s probably more out there than what we have coded in the system, but our staff do try to talk through that process.

Obtaining a good cause exemption. When a parent discloses safety concerns to their SNAP worker, the worker will provide a good cause exemption form. The parent receiving SNAP benefits is typically asked to submit supporting documentation to supplement the good cause exemption form, such as written statements from themselves or witnesses, court orders, visual evidence, or emergency room or police reports. However, in Idaho, SNAP agency staff explained that they do not require the submission of supporting documentation; instead, workers use their judgment to assess the credibility of the claim in the course of their conversation with the parent. It should be noted, however, that Idaho's SNAP policy manual indicates that individuals claiming good cause have 20 days to provide supporting evidence for the claim, which, in this case, is a notarized statement.

Many staff said that good cause claims frequently did not move forward once staff requested documentation, with one staff member explaining:

But often the domestic violence, they think that that's going to get them out of having to do it. And sometimes they really do have that situation. But then when I say, okay, we need documentation. 'Well, I don't have that. Can't you just take my word?' And then at that point we don't get the paperwork back, ends up not going anywhere after.

- **If a good cause exemption is approved**, the parent is no longer subject to the cooperation requirement, and their benefits remain fully intact. At recertification, they may be required to provide the same supporting documentation presented for the initial good cause determination to maintain their good cause exemption. Michigan has an additional category of good cause determination: "good cause: continued action." This determination grants the custodial parent receiving SNAP benefits the good cause exemption while maintaining that the additional income from a child support order would provide significant aid to the family. In these cases, the local child support agency will continue a child support order establishment while not requiring the custodial parent receiving SNAP benefits to cooperate. The household benefit remains fully intact, and no sanction is applied to the case.

Once the determination is made and entered into the SNAP system, the information is sent to the local child support agency's system in an overnight data transfer. When informed of a good cause determination, the child support agency ceases all action on the case.

- **If a parent is not granted a good cause exemption**, the parent is required to cooperate with child support as usual.

Other mechanisms for identifying risk of violence and protecting parents. Child support agencies conduct their own screenings for safety risks. Sometimes during this process, parents receiving SNAP benefits may disclose safety concerns to child support workers that they did not share with their SNAP worker. If a parent expresses fear for their safety or the safety of their child(ren) to a child support worker, the worker will place a hold on the case in their system. From that point, the parent receiving SNAP benefits typically has up to 45 days to contact the SNAP office, make their claim, and receive a determination. If the decision is not made within the specified time frame, the child support agency may continue pursuing cooperation.

Outside of good cause exemptions from cooperation, child support staff can exercise other options to protect the parent’s confidentiality while working with child support. Child support agencies and courts have precautions that can be put in place if a parent is still required to cooperate amid safety concerns. For example, these agencies may opt to require additional security in court, redact personally identifiable information from all official documents, or override any required mediation between the custodial and noncustodial parent. These precautions are intended to maintain a degree of separation between the custodial parent and the noncustodial parent through the duration of a case to keep the household safe.

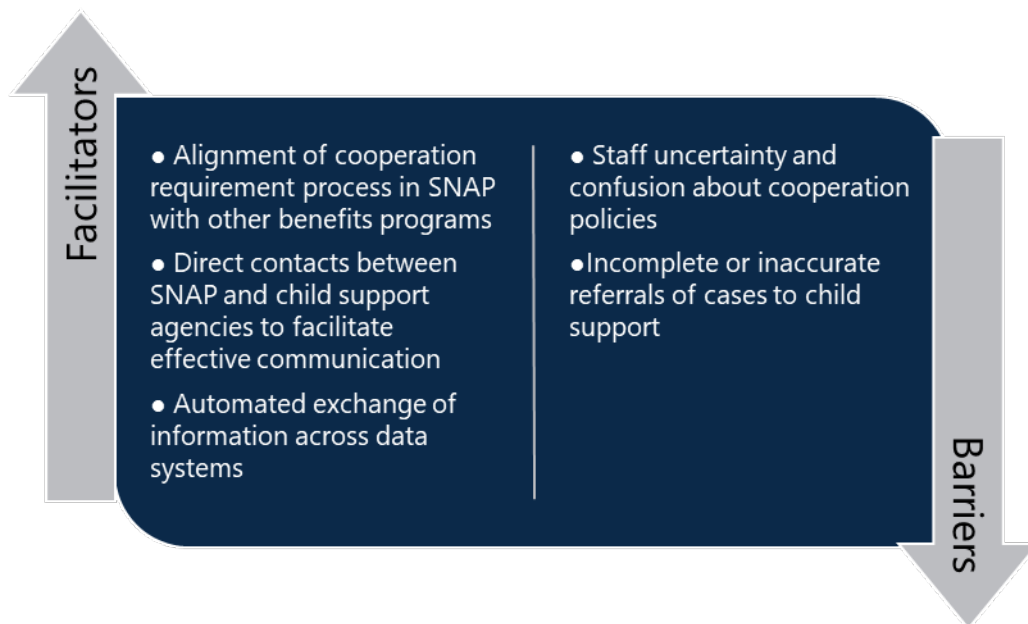
SNAP and child support agency staff also noted that the child support agencies typically have security on-site and child support workers that are trained to enforce safety protocols. These measures aim to protect custodial parents from potential intimidation.

The next section describes structural and contextual factors that create barriers to implementing the cooperation requirement and factors that facilitate implementation.

2.4. Understanding Factors that Support and Impede Implementation of the Cooperation Requirement

Implementing the cooperation requirement requires coordinated effort within and across child support and SNAP agencies. Interviews with staff from both programs as well as with SNAP participants provided firsthand information and insights into factors that supported implementation or posed challenges. Exhibit 2.11 presents an overview of factors that facilitated implementation or created barriers to implementation. This section provides additional details about these facilitators and barriers.

Exhibit 2.11. Facilitators and barriers to implementation of the cooperation requirement



Implementation Facilitators

Implementation facilitators are factors that help program staff to implement a policy or program. Understanding factors that have supported study States' implementation provides insights for other States as to what supports need to be in place to implement the policy effectively. The study's assessment of the implementation experience described by program staff found three primary facilitators for implementing cooperation requirements in SNAP: (1) alignment of cooperation requirement processes in SNAP with other benefits programs, (2) having direct contacts for SNAP and child support program staff, and (3) the automated exchange of information across data systems.

Alignment of Cooperation Requirement Processes in SNAP With Other Benefits Programs

When SNAP and child support program staff were asked about their experiences implementing cooperation requirements in SNAP, they often described how they follow the same processes and procedures for TANF case cooperation requirements.²⁵ A respondent from one State that already shared data across the TANF and child support data systems described how following similar procedures made data updates to allow for SNAP referrals relatively simple: "Child support referrals were required for TANF already, child support referrals were required for child care already, it just threw in SNAP. There wasn't anything that would be really isolated or specific." About the effect of the new policy on field staff, a SNAP supervisor in one State said the following:



"It was smooth to us because we are actually already implementing this policy in something else [another program]. So like I said, it just went onto another program, so that's why it went so smoothly."

—SNAP worker

You have to remember for the field, this wasn't really a big change because the whole concept there of child support cooperation and good cause and referrals, all that was already there from TANF. So they were adding a program, although it's a large program.... And so implementing this wasn't nothing new to our veteran staff that were already trained in TANF because they already make referrals to child support.

Another SNAP worker explained that having cooperation apply to SNAP participants just as it applies to TANF participants improved the consistency of the messaging of requiring cooperation: "I think it helps because it just shows consistency across all the programs...so I think it just maintains that underlying theme of consistently tapping into all of your available resources as long as you're safe. That's the important thing."

Direct Contacts Between SNAP and Child Support Agencies

Having a direct contact in the corresponding agency who could answer questions quickly supported implementation. When child support and SNAP staff could easily and effectively

²⁵ In most study States that had a cooperation requirement in SNAP the same staff are responsible for determining eligibility for multiple public assistance programs.

communicate or share information, staff from both agencies reported less difficulty and challenges with implementing the cooperation requirement. As one SNAP worker put it, “The [SNAP] workers and the child support office need to have good communication with each other. That’s very important anyway, especially in these kinds of situations.” In one study State, a local SNAP supervisor described the relationship they had with the child support agency as follows:

We’re always welcome to pick up the phone and call child support. For example, one of the cases that I had when I first became a supervisor here, I was still finishing up my caseload from being a worker and the payments were all over the place, and it looked like they were coming from different sources. So I picked up the phone, I called child support, we discussed it over the phone, we got that settled, and everything was taken care of. So like I said, we’re always welcome to call them.

Knowing staff in the other programs personally also assists with communication. In one State, a child support worker described, “In the [SNAP] office, all of the workers in [the local office] will call and they’ll say, ‘Hey can you look at this for me,’ or whatever. So we have a very good relationship with them, so we don’t have hardly any problems.” A local SNAP staff member in a State that did not have this type of access to a point of contact in the child support agency expressed how direct communication could be beneficial:

I almost sometimes wish we had a contact with Benefits or somebody who...handled the cooperation [cases] or that we could talk to or ask questions or find out more information if we needed it. Because a lot of times, I’ll ask parents questions and they’ll say, ‘I already gave that to Benefits. I don’t want to give all this information again.’

Automated Exchange of Information Across Data Systems

Having automated, interfacing data systems also facilitated implementation. Staff from both programs and across the study States noted that most communication about SNAP cooperation requirement cases occurs via the data systems. Automatic referrals of cases from SNAP to child support enables SNAP to implement the requirement without adding much additional manual work. Automatic updates of cooperation status also reduce the need for extra communication from the child support staff, although child support still experiences an increase in workload due to the additional referrals.

Across the study States and programs, there was general consensus that the ability to share case information via an automated data system was critical to States’ ability to implement the cooperation requirement. Conversely, when the agencies use different data systems, child support and SNAP staff reported considerable challenges with implementation such as difficulties matching people across the systems and receiving updated information in a timely fashion. One staff member commented:

I know that the two systems, they don’t always talk. So that was a challenge back then trying to get the code to [child] support to come over to [SNAP], and then that hinders the referral, too. If that code is hung up, then that hinders the case being worked.

Exhibit 2.12. Important considerations for data system changes

Making data system changes was the most time- and labor-intensive activity for study States during the pre-implementation planning phase. Arkansas and Kansas reported that it took six months to one year from the legislation's enactment to the start of implementation to make the necessary data system updates. In West Virginia, implementation of the requirement has been delayed by years, in large part because of the time it takes to complete their planned integration of the child support program data system with the system used by the other assistance programs (including SNAP). ▲

Implementation Barriers

Agencies also experience roadblocks and face challenges when implementing new policies and programs. Understanding the experiences of study States that require cooperation can offer lessons to other programs about implementation challenges to anticipate and plan solutions to these barriers. The study's assessment of implementation experiences finds two primary challenges faced by States: (1) staff uncertainty and confusion about cooperation policies and (2) incomplete information or inaccurate referrals of cases to child support. These challenges can create burden on staff and frustration for participants.

Staff Uncertainty and Confusion About Cooperation Requirement Policies

Local SNAP staff had varying levels of understanding of the cooperation requirement policies and this caused extra work for child support staff and frustration for participants. SNAP staff described not always having a clear understanding of the policy or how to implement it. Additionally, within a program there were instances of inconsistent understanding of the policy across staff. Some SNAP staff expressed uncertainty or confusion over which parent was required to cooperate with child support, which agency was responsible for determining cooperation, and which agency was responsible for determining good cause. For example, a SNAP worker was unable to describe which parents were subject to a cooperation requirement in certain uncommon household compositions, such as when a relative caretaker had custody of a child. This worker said, "When in doubt, all parents get referred and it's up to child support at that point, it's on their front. It's up to child support to decide that because we have to refer all parents over."

Local SNAP staff also expressed difficulty communicating to parents subject to the requirement why they needed to cooperate with child support and what cooperation entails. This was especially challenging when participants expressed resistance to cooperating during the SNAP eligibility interview. One SNAP supervisor described how such a conversation might progress:

We have to explain about the Federal and State mandates and that kind of thing. And some people are very unhappy with it...then many times I would say, 'but if you want to know more of the ins and outs of the child support part...if you have specific questions, you need to contact somebody who are in child support because they're the experts in that, we're not.'

Child support staff reported that SNAP staff members' lack of understanding of the cooperation policy and the work of the child support agency was evidenced by parents who contacted them because they were confused about the requirement. The child support staff member describing

this challenge said staff in their agency spend time explaining to participants why they have been required to cooperate with child support and what cooperation entails. A child support worker in one study State said the following:

I feel like sometimes there are customers who go back and forth, back and forth. And [SNAP] will tell them, 'Oh then just call child support.' Or they say, 'Just call child support, tell them you don't want a case.' And then we explain again. Sometimes I feel like there are those cases where customers do get kind of pushed back and forth, and we have to explain, 'We're separate from [SNAP], so I'm sorry that you've been playing phone tag with us.' But yeah, we either open a case or we don't, and then we just report to [SNAP] whether or not we do.

Some SNAP workers expressed frustration with what child support explains to participants about the cooperation requirement policy. A SNAP supervisor in one study State said about good cause exemptions, “[Child support is] sending them back to us, but they’re not telling them why they’re sending them back to us.... That’s the confusion. I don’t know if they explained that as well as they need to on their side.”



Exhibit 2.13. Participant reflections about communication with and between SNAP and child support

Despite many staff expressing effective communication practices across agencies and the importance of automated data systems to facilitate exchange of information across agencies, some participants expressed frustration with the lack of communication and coordination between the SNAP and child support agencies. One custodial parent participant described the difficulty of being passed back and forth between the two agencies as follows:

“They say they coincide together, but there’s two different people where they’ll tell you reach out to this person. You reach out to this person, they tell you reach out back to that person.”

Other participants shared their frustration over repeatedly having to provide the same information to the agencies multiple times, citing examples of continually giving answers to the same questions or fill out the same application. If not, they risk being determined noncooperative. One participant recalled being asked to fill out the same child support application “10 or 20 times” and continually having to follow up about the noncustodial parent’s employment despite reporting that he does not have a job. ▲

Incomplete or Inaccurate Referrals of Cases to Child Support

The quality of referrals from SNAP to child support for cooperation was frequently cited by child support staff as a challenge. In some study States, child support workers noted that many of the referrals they receive from SNAP are inappropriate for child support services. For example, the noncustodial parent may have been deported or be deceased. Reasons for these inaccurate referrals may be due to data system limitations as well as SNAP staff reluctance to collect information about noncustodial parents needed to make referrals to child support.

One child support worker thought that some of the inappropriate referrals in their State might be due to how SNAP workers transmit information about noncustodial parents to the child support agency. They explained that if information about the noncustodial parent came to them

through an automated referral process, a duplicate record would be created in the child support agency's data system. The worker said that these duplicate records create more work for the child support staff. They also noted that SNAP workers might not fully understand how the



"We get a lot of bogus referrals, meaning the parties are in the same household, there was no reason to send, there's no child support action to proceed, or we even get ones where the other party is deceased."

—Child support worker

interface works and how the information is displayed in the child support data system. The study team's interviews with SNAP staff support the notion that SNAP staff do not have a detailed understanding of what the child support data system's interface looks like or how it functions. As described earlier in this section, inappropriate referrals could also occur if a SNAP worker is unsure whether a referral should be made, but errs on the side of making a referral, which might be the approach the worker was trained to take.

In addition to creating more work for child support staff, inaccurately identifying individuals for cooperation with child support could negatively affect participants as well. If individuals are told they are required to cooperate with child support, it could deter them from completing their application for food assistance. Wrongly informing individuals about being subject to the requirement could be pushing away families who otherwise are in need of assistance. Inappropriate referrals can also create confusion and frustration among participants when they get caught in miscommunications between the SNAP and child support programs.



Exhibit 2.14. Loraine's experience attempting to comply with the cooperation requirement²⁶

Loraine is a custodial parent of three children. She is subject to the cooperation requirement because two of her children have the same noncustodial parent who does not live with her. Loraine first began receiving SNAP assistance more than 10 years ago but has never received child support despite filling out the child support application several times over the last four years due to the cooperation requirement. She expressed frustration after having to continually fill out the lengthy, "novella type" application every time with detailed questions about her, the children, and the noncustodial parent. Loraine found the application confusing because it included a lot of "legal speak" and asked for a lot of information about the noncustodial parent she does not know, such as his Social Security number. She described several instances of receiving reductions to her SNAP benefits after forgetting to or being unable to turn over additional information about the noncustodial parent. After about two years of trying to get into cooperation, Loraine believes the child support agency has given up on her case and is no longer trying to get child support from the noncustodial parent because he is not employed. When asked, Loraine described her financial situation as "drowning" and expressed frustration about her attempts to comply for so many years just to receive assistance for her children:

Like in my case, since their dad doesn't want to help, [the government] might as well try and help in other ways—instead of trying to say child support [is] the only way you're actually going to get any kind of financial help. ▲

²⁶ The legal names of in-depth interview participants have been replaced with pseudonyms throughout this report to protect their privacy.

SNAP staff also described the challenges they face in obtaining sensitive information from parents applying for benefits. Staff reported many reasons why they believed a custodial parent may not provide information about a noncustodial parent including that they simply did not know the information, there was a miscommunication and the custodial parent did not know they were supposed to provide the information, the invasive nature of the questions makes parents applying and receiving SNAP uncomfortable and less forthcoming, custodial and noncustodial parents do not want to damage the relationship with the other parent, or there is a domestic violence issue. One SNAP worker provided an example:

Some clients can get very upset, and I think that makes [SNAP workers] even more hesitant to ask those [personal] questions.... If someone has no income and they tell us, 'I'm paying \$700 a month in rent.' But we have to ask the question, 'Okay. How are you doing that?' And they get very upset about that question ... And then on top of that, now [we] have to ask them, 'Where is the mother of your child, and where does she live, and how long have you been separated, and why don't you live together?' Goodness sakes! That gets very overwhelming for everyone, I think. So, I think that's part of it, too.

SNAP staff also believed that in some cases participants didn't want to provide information because it could damage their relationship with the other parent. They were of the opinion that the participant would prefer to accept the sanction to avoid providing information about the other parent. Exhibit 2.15 provides participant perspectives on the information they are required to provide.



"It's hard getting that information.... Not knowing who the father is can be a big burden when trying to input information needed for the cooperation requirement into the data system."

—SNAP worker

When participants are not forthcoming with information about the other parent, it can result in incomplete information being sent to the child support program. Only when the participant is contacted by child support and the child support provides additional information about the requirement does the parent understand why their private information was requested by SNAP. At that time, the parent may disclose information to the child support worker that makes it clear the household is not appropriate for child support services.



Exhibit 2.15. Participant reflections on the information required to cooperate

Providing private information may present challenges for SNAP applicants and participants—from simply not knowing the information being asked of them, to not wanting to “rock the boat” if they have established an informal arrangement with the other parent, to fearing that putting the noncustodial parent on child support could potentially lead to difficulties and even harm for their children or themselves.

Some participants felt the information they were required to provide to be in cooperation felt invasive, confusing, or uncomfortable. These participants shared various reasons for their discomfort, including feeling uncomfortable sharing their personal information with workers and feeling worried that sharing the other parent’s personal information might lead to that parent being upset with them. Examples include the following:

- One participant said that it made her uncomfortable to be asked by the worker why she had moved away from the noncustodial parent and into her mother’s house. She did not want to share that she moved because she felt unsafe living in the same house as the noncustodial parent due to a history of abuse.
- Another participant noted that she was asked when and where her child was conceived, which she felt to be too personal.
- Some participants also expressed discomfort or uncertainty about providing the personal information of the noncustodial parent, especially in scenarios where they no longer had contact.

Some participants took issue with the fact that their benefits were dependent on their ability to collect information about someone else. For example, one participant was surprised by how much information they needed to provide for the noncustodial parent, especially because they were no longer in regular contact with them:

When I was reading this thing, they asking me more about her business than my own business. What’s [the other parent’s] Social Security number, what her address is, what her this is, what—Who’s filling out this application? Me or her? They want to know too much business. They want you to know where the baby daddy stay at, what his information is. That’s crazy. Who am I? The police officer, detective? That don’t make sense.

Many participants felt they didn’t have all the information about the noncustodial parent needed to cooperate or felt that they had provided everything they knew to the best of their ability. Participants shared examples of having to provide Social Security numbers, current addresses, or other information about the noncustodial parent that they did not possess or could not easily get. Some worried that the lack of information they could provide about the other parent would lead to them being determined as being noncooperative and sanctioned. In other cases, participants were confused as to why they received a sanction when they shared as much information as they knew about the noncustodial parent. For example, one participant described the frustration of receiving a letter informing her she was not in compliance after trying and failing to track down the noncustodial parent’s whereabouts after he moved out of State:

And then the last letter I received was like we’re going to end your case because you can’t provide us with any information, and I’m like, how is that my fault? So you’re telling me I can’t get benefits with my children, because I don’t have the information about my [child’s father’s] whereabouts. That’s insane.

A few expressed some irritation in having the responsibility to have to track down information about the noncustodial parent to receive SNAP benefits. Others believed it was the child support agency’s responsibility to find the required additional information about the noncustodial parent if it went beyond what they were able to provide. These respondents often did not fully understand why they had to pursue child support through the formal system and provide the range of information requested on an ongoing basis. For example, one custodial parent described their frustration with this step in the requirement process:

I was kind of frustrated. Because like I said, I didn’t have all the information. Like I didn’t understand why it was on me, necessarily—totally on me to track him down. ▲

2.5. Participant Experiences and Reflections on the Cooperation Requirement

Exhibit 2.16. Overview of findings from in-depth interviews with participants

Participants shared both positive and negative sentiments about the cooperation requirement, with many noting that their views were situational and varied by an individual's or family's circumstances.

- Those who expressed positive sentiments or support for the cooperation requirement believed the requirement provides assistance with opening a case and pursuing child support, brings additional money into the household, or promotes parental accountability.
- Those who expressed negative feelings about or a lack of support for the cooperation requirement cited various issues with it. These participants commonly believed the requirement offers limited financial benefit, places strain on relationships due to child support involvement, requires parents to engage the noncustodial parent in instances when they do not want to, or negatively impacts the other parents' financial or personal situation.

Participants who received sanctions for noncooperation described various reasons for receiving a sanction and elaborated on the challenges they faced in their attempts to cooperate. Participants also shared the negative impact that sanctions had on their family's already precarious financial situations.

Most participants in States with cooperation requirements at the time of the study said that they were not informed about good cause exemptions at any point during the process, suggesting that there are many challenges and limitations that prevent good cause exemptions from being implemented as intended. ▲

SNAP participants interviewed in each of the study States offered a range of views and experiences—both positive and negative—about the cooperation requirement. Participants in States with SNAP cooperation requirements reflected on their State's current cooperation requirement, whereas participants in States without a current SNAP cooperation requirement reflected on a hypothetical SNAP cooperation requirement. Their perceptions provide important context for understanding which aspects of the policy or the process are, or potentially could be, problematic or challenging for SNAP participants. Appendix B includes additional information about the participants interviewed for the study and the study team's approach to recruitment, interviewing, and analysis.



"I think it is a good requirement. If you do have to put your spouse on child support, at the end of the day it's coming back into the house, but it's coming in for the kids."

—Custodial parent

Participant Perspectives on the Merits and Drawbacks of the Cooperation Requirement

Interview participants expressed a range of views informed by their own knowledge and lived experiences that underscore the complex range of opinions surrounding a cooperation requirement for SNAP. Overall, one-third of participants expressed positive sentiments or support for the cooperation requirement, whereas 40 percent of participants expressed negative sentiments or indicated their lack of support for the SNAP cooperation requirement. About half of respondents had mixed opinions about the cooperation requirement, noting that their views

varied based on an individual's or family's circumstances.²⁷ These participants generally acknowledged that they supported the cooperation requirement in certain cases and recognized its potential benefits, but they were not in favor of a cooperation requirement that lacked the flexibility to account for a family's unique circumstances.

Participants who expressed positive views about the cooperation requirement explained why they believed it was a beneficial policy, at least in some circumstances. The most commonly cited reasons that participants gave for supporting the requirement included the following:

- **Provides assistance with opening a case and pursuing child support.** Some participants appreciated how the cooperation requirement led them to receive help from the child support agency to open a child support case, sometimes acknowledging that they would not have done so on their own accord. For example, one participant described feeling unsure about how to pursue child support before being connected to the child support agency through the cooperation requirement—"I don't know the first thing to do to go get child support"—and suggested that they didn't have the financial resources to hire a lawyer to help them pursue child support. A few participants specifically mentioned the important role of the child support agency in pursuing and enforcing financial support—"It's like you got this middle guy who's helping two people that couldn't get along"—particularly in situations where the noncustodial parent failed to provide adequate financial support for their children.
- **Brings additional money into the household.** Some participants cited the positive impact of child support on their family's overall financial situation. They described how the child support helped them pay their household bills and provided money for their children's expenses that they would otherwise struggle to afford, including clothing, diapers, and extracurricular activities. One participant shared that child support is the "only thing that gets us by" and described experiencing stress and missing bill payments on the months when they didn't receive child support from the noncustodial parent. Others who received child support on a less consistent basis indicated that they don't "expect it" or "rely on it" to make ends meet, but appreciated the extra money when it was provided.
- **Promotes parental accountability.** A few participants expressed the belief that the child support cooperation requirement encouraged increased accountability and responsibility for children because it required both parents to provide for their children, instead of relying solely on the custodial parent. Some of these participants believed the cooperation requirement encouraged personal responsibility on the part of the custodial parent to pursue additional support for their children, including alternatives to government assistance. Most who cited increased accountability believed the presence of the cooperation



"I like the requirement simply because what it does is make the [custodial parent and noncustodial parent] realize that you didn't do this by yourself. There's another responsibility on the other end."

—Custodial parent

²⁷ Those participants who expressed mixed sentiments are also included in the positive and negative sentiment groups, depending on the nature of their opinions.

requirement increased the personal responsibility of the noncustodial parent because the requirement to pursue child support “forces the other parent to help even though they don’t want to.”

Participants who were critical of the cooperation requirement offered many reasons for their concerns or outright opposition to it, including the following:

- **Cooperation with the child support agency offers limited financial benefit.** Among the participants who did not believe the cooperation requirement was worthwhile, some shared their own experiences in which they received little or no money through child support. In general, these participants did not see the value of pursuing child support without any resulting financial gains.

These participants discussed having to expend additional time, effort, and emotional hardship to comply with the requirement and remain in cooperation, but not seeing any benefits of doing so. A few participants expressed concerns about receiving less financial support through the formal child support system than they were already receiving through informal arrangements in place outside of the system.



“I just don’t think it’s logical. If the other parents are not going to pay, why punish the children and the person that’s trying to get the help? They’re not going to get it either way.”

—Custodial parent

- **Strain on relationships due to child support involvement.** Some participants expressed concerns that their required involvement in the child support system negatively affected their relationship with the other parent, and reported increased tension or “friction” in the co-parenting relationship as a result of the cooperation requirement. One custodial parent, while reflecting on their relationship with the other parent, stated that their “relationship wouldn’t be so strained if child support wasn’t involved.”

Another custodial parent explained that arguments with the other parent about child support involvement damaged their relationship and described their thoughts on the cooperation requirement as follows: “It doesn’t really make it helpful for us to have to be forced to do anything for anything. We’re essentially being put [between] a rock and a hard place. The government is the hard place, and the men are the rock.”



“If his dad is going to be engaged and active, ...he needs that support. It’s very important that they have [an] active, engaged father, to me, because...he’s 14 now, he’s a teenager. So that’s more valuable than anything—that his dad is there and trying to be a father, male, positive role model to him—than just money.”

—Custodial parent

Some participants said they did not want to anger the noncustodial parent or damage their relationship by involving child support, particularly when they had a good relationship already or when the noncustodial parent was already actively involved with their child(ren) and providing some level of informal support. Those who received some type of informal support suggested that they were fine with the type or level of informal support they were currently receiving and did not want to disrupt it.

Others discussed wanting to work things out with the other parent directly as opposed to involving judges, lawyers, and other elements of the formal child support system. One custodial parent in a State without a SNAP cooperation requirement, who had opened a child support case but eventually closed it, described her preference to work things out with the other parent outside of the formal child support system:

I wanted to just focus more on our son, instead of just dealing with courts and court dates and money and all of that. And the relationship that I have with, you know, his father is pretty open. We can usually work on things together outside of court.

- **No interest in engaging the noncustodial parent, often because of a variety of concerns, including risk of domestic violence.** A few participants did not support the cooperation requirement or opted not to comply because they did not like that it required them to involve the other parent. Some did not want anything to do with the noncustodial parent for various reasons, citing instances of prior abuse or personal issues that made them want to avoid the other parent. For example, one participant shared that their relationship with the noncustodial parent was strained because the noncustodial parent wanted them to get an abortion upon finding out they were pregnant with their child. Others said that they did not want to be reliant on the other parent and preferred to try and make ends meet without them. Many of these participants worried that complying with the cooperation requirement and pursuing a child support arrangement would somehow reengage the other parent in their lives or the lives of their children. A few participants also expressed resistance to opening a child support case because they didn't want to create the potential for shared custody with the noncustodial parent by doing so.



Exhibit 2.17. Tisha's experience with the cooperation requirement

Tisha is a single parent with a disability and has one biological daughter and two foster children. After applying for SNAP benefits as a last resort to support her family, she opened a child support case for the noncustodial parent in order to comply with the cooperation requirement. During the interview, Tisha explained that it was overwhelming to fill out the child support application because of all the private information she had to provide about the noncustodial parent, noting that he had to get a DNA test and agree to share his Social Security number, which he did not want to do. Though a child support case was ultimately opened, she rarely receives any of the money she is owed because the noncustodial parent does not pay. Tisha believes that opening a formal child support case against the noncustodial parent means she is now receiving less money; a formal child support case created a lot of animosity between the two of them and deterred him from providing informal support. It negatively impacted not only the relationship between Tisha and the noncustodial parent, but also the relationship between the noncustodial parent and their daughter. Tisha explained that now she and her daughter are not allowed at his house and her daughter cannot see her half siblings. All in all, she experienced several downsides from the cooperation agreement without receiving the benefit of additional money from child support. Tisha summarized her view of the cooperation requirement as follows:

I think it does more harm than good. I'm sure that's not the case in every situation. But in mine, I don't even get any money from him. I'm still getting the animosity from him for doing it, but I'm not getting the help. ▲

- **Concern about the impact of child support involvement on the other parent’s financial or personal situation.** A few participants emphasized that the noncustodial parent’s financial circumstances or current situation limited the financial support they could provide, so custodial parents were apprehensive to support a cooperation requirement that would require them to pursue child support. Some of these respondents did not want to place an additional financial burden on the other parent who they believed was already struggling to make ends meet. Others described how the establishment of a child support order could prove harmful to the other parent based on the current circumstances. For example, participants across all the study States cited issues related to substance use, mental health, incarceration status, and disabilities that prevented the noncustodial parent from being able to work or provide child support.

Several of these participants cited concerns about the amount of the order set by the child support agency, suggesting that it can be challenging or unrealistic for the other parent to pay. One custodial parent who ultimately worked with a judge to reduce the amount of child support he received described their situation as follows: “I mean they were asking like \$2,000 a month for the kids from her. And that’s a lot of money and she can’t afford to live like that.”



“I don’t think it would be fair to force [anyone] to file because in all reality, if someone wanted to file for child support, they would have done it on their own. I know a lot of people don’t go through the court system because it does put a lot of stress on the family, does put a lot of strain on whichever person is going to be paying it.”

—Custodial parent

Among participants who discussed challenging circumstances faced by their noncustodial parent, a few also mentioned concerns about the possibility that the noncustodial parent would be penalized if they failed to comply with the child support order. In general, most of these participants did not necessarily agree with the idea of sanctions or did not want to make the noncustodial parent subject to additional legal repercussions when they were unable to pay child support. Specifically, participants cited issues related to driver’s license suspension and incarceration for failure to pay child support. One participant, whose child’s noncustodial parent received sanctions for not paying child support, described being unable to close the child support case after she opened it:

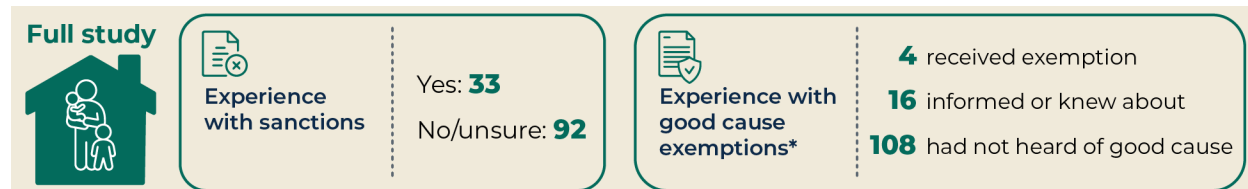
I wanted to just close up the support order, because he’s not going to ever pay me anyway... He’s had disability issues and stuff and not working, and he has all his back child support. I just want to close it. He can’t pay it, he’s not working. It’s hurting him, it’s not helping him. He can’t pay. And they told me that I still had to keep it open ... because if I [close it], they’ll cut me right off the benefits even though they know he’s not working. He’s even applied for disabilities [disability benefits]. I’m not sure what the point of this is with that, but they tell me it’s a requirement and there’s nothing you can do.

Participant Experiences and Reflections on Sanctions for Noncooperation

Most participants, regardless of whether or not their State had a cooperation requirement, described their financial situation as “barely making ends meet” or having “just enough.” Many cited the rising cost of basic necessities such as rent, utilities, and food as a reason for their financial stress. Others described recent unforeseen circumstances that negatively impacted their financial situation, including a death in their household, unexpected car repairs, or healthcare expenses. Currently employed participants described “living paycheck to paycheck.” Those who worked only part-time or not at all during the time of their interview described situations that made it difficult for them to work, including issues finding employment, physical or mental disabilities, or caregiver responsibilities.

At least 33 interview participants described receiving a SNAP sanction at some point due to noncooperation (Exhibit 2.18). These participants described various reasons for their sanctions, including issues with missing paperwork, confusion around the incarceration status of the other parent, not having the necessary information about the other parent, missed appointments or court dates, failure to complete child support paperwork during recertification, or issues communicating with the SNAP or child support agencies.

Exhibit 2.18. In-depth interview participants’ experiences with sanctions and good cause exemptions



* Participants who reported receiving an exemption are also included in the count of participants who were informed or knew about it.

Given the financial pressures and difficulties participants faced, those who had been sanctioned for noncooperation felt the added negative impact of sanctions on their financial situation. One participant described it as a “dehumanizing experience” when they had their SNAP benefit reduced. After being sanctioned, participants described going without or finding other ways to make ends meet. A few described relying on friends or family members, and some described simply making do with the lower benefit amount while they worked to resolve the issue that led to the sanction. One custodial parent described going into greater debt to buy food after they were sanctioned: “I have no extra money a month and so trying to buy food with no extra money caused me to go even further in debt, because I was robbing Peter to pay Paul.”

Many participants who had received a sanction for noncooperation expressed frustration over the process of getting back into compliance. Some participants experienced difficulties getting their full benefit amount after complying with their State’s cooperation requirement, including lost or missing paperwork, system or processing issues, or challenges working with multiple agency workers. When attempting to get back in compliance, a few participants described having to reapply or complete paperwork that they had already completed. One participant reported getting her full benefit amount back after she filled out paperwork for the cooperation

requirement, only to have her benefits reduced the next cycle because the change was not logged in the SNAP system. Others described having to engage in ongoing back-and-forth with SNAP or child support workers to get the issue resolved. For example, one participant cited a communication issue between the child support and SNAP agencies, where each agency showed that the custodial parent was in compliance on the child support side, but the sanction had not been removed, or “cured” (see Exhibit 2.19 below). Another described the “big hassle” of having to spend six or seven hours waiting at the child support office to provide the information that would enable her to have her sanction lifted.



Exhibit 2.19. Jeanne’s experience with cooperation requirement sanctions

Jeanne is a mother of four and is the custodial parent of two of her children who are under age 18 and living in her household. She had a child support case opened for two of her children when she filed for divorce and has received regular child support payments from the noncustodial parent since 2021. When the cooperation requirement took effect in Arkansas, Jeanne received a letter saying her benefits would be discontinued because she was not in compliance with the cooperation requirement. Although she had an active child support case when the cooperation requirement went into effect, Jeanne needed to have her case switched to a “monitoring” case within the child support clearinghouse. She was eventually able to provide the necessary paperwork to get back into compliance, but when her benefits resumed, Jeanne saw that her benefit had not been restored, which she took to mean that the system still showed her as out of compliance. At the time of the study interview, her full benefit amount still had not be restored. Jeanne believes it is better to receive financial support through the formal child support system because any lack of payment can be enforced by the agency and she knows someone is working on her behalf to get the payments. However, she has been frustrated by the cooperation requirement and felt that it was onerous to prove that she was already connected with the formal child support system:

I am [cooperating], but they still haven’t fixed it and I’ve called several times. So, it’s like once it’s mixed-up, they don’t really care enough to fix it. ▲

Participant Experiences and Reflections on Good Cause Exemptions

Although good cause exemption is a key policy component of the cooperation requirement, participants in several States indicated that there are many challenges and limitations that prevent good cause exemptions from being implemented as intended.

Across the five study States with a cooperation requirement, most participants said that they were not informed about good cause exemptions at any point during the cooperation requirement process (Exhibit 2.18). Several participants shared how they wished they had known about the option because it was something they would have pursued. Of those that had heard of the good cause exemption, many often recalled learning about it informally from other members of their community but not during the application interview. Several said that their SNAP worker made the cooperation requirement seem entirely mandatory, without exception. A few participants recalled asking their SNAP worker if there were any possible exemptions to the cooperation requirement and they were told “no.” One custodial parent in a State in which SNAP is responsible for making good cause determinations described her experience as follows:

They told me they weren’t sure of the requirements because it was something new, that it just started. But they were like, I’m sure that...if child support felt that there was any need for

protection or anything, they probably wouldn't pursue it, but he [the SNAP worker] wasn't sure. They didn't have the answers as far as the way child support would take care of everything like that. They just knew that this was the requirement, and this was how you were supposed to handle it.

A few participants shared that they had requested and were successful in receiving a good cause exemption from the requirement as part of their participation in SNAP or other assistance programs with cooperation requirements. One participant described sharing police reports with their SNAP worker and receiving an exemption easily. Another participant recalled hearing about situations that might warrant a good cause exemption. However, she never heard back from SNAP after applying for one, despite having a protection order against a noncustodial parent.

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Chapter 3 Cooperation Requirement Outcomes, Effects, and Costs

This chapter provides findings from an analysis of administrative child support and SNAP data from the study States on a variety of outcomes that could be related to implementation of the cooperation requirement. These outcomes included SNAP benefit amount, number of child support orders, amount of child support received by households, and socioeconomic and demographic characteristics of groups potentially affected by the requirement, among others. This analysis documented outcomes at a single point in time, providing a snapshot of the characteristics of SNAP households that are subject to the cooperation requirement in the study States that use the requirement, that might be subject to a cooperation requirement in the study States that do not have the requirement, and the child support experiences for SNAP households that are already in the child support program. To estimate the potential effects of the requirement, the analysis also assessed how outcomes changed in one State—Kansas—from before its implementation of the requirement to after implementation. Finally, the analysis examined the costs of implementing the requirement and how those costs relate to the estimated effects of the requirement.

3.1. Snapshots of Outcomes Relevant to the Cooperation Requirement

Child support cooperation requirements for SNAP could affect a variety of outcomes. It is useful to document outcomes for groups that might be affected by a cooperation requirement, both in States that have implemented the requirement and in those that have not. Although this analysis does not provide causal estimates of the effects of the program, it provides valuable context for considering what groups could be affected by the policy and their outcomes.

Data from a single point in time in each of the study States was used to construct a snapshot of relevant outcomes and characteristics for them. This section describes the data collection and analytic approach for this outcome snapshot analysis, presents the key findings, and discusses the implications of these findings.

Data Collection for Outcome Snapshot Analysis

The study team worked with all the study States to collect administrative records on SNAP, child support, and other public benefit systems. All eight study States provided some SNAP records, while five study States provided child support records. However, there was variation across States in the information that was available, the time period for which information was available, the ability to provide child support and TANF data, and the ability to link that information to SNAP records (Exhibit 3.1). Consequently, the findings were based on analyses tailored for each State according to the availability and quality of the information provided.

The five study States with cooperation requirements (Arkansas, Idaho, Kansas, Michigan, and Mississippi) provided 1 month of SNAP administrative data. All of these States, except for Arkansas, also provided child support administrative data for the same month. Three States (Arkansas, Michigan, and Mississippi) provided TANF data for the same month.

The three study States that did not have cooperation requirements (Ohio, Tennessee, and West Virginia²⁸) provided 1 month of administrative SNAP data. Ohio also provided 1 month of child support administrative data for the same time period, which was used to estimate the percentage of the SNAP caseload already connected to child support. While Tennessee and West Virginia were unable to provide child support administrative data, the SNAP data they produced included an indicator for any reported child support payment, receipt, or deduction. These variables were used as a proxy indicator for being connected to child support.

Exhibit 3.1. Summary of administrative records data provided, by study State

Study state	SNAP	Child support	TANF
States with cooperation requirements			
Arkansas	Yes	No	Yes
Idaho	Yes	Yes	No
Kansas	Yes	Yes	No
Michigan	Yes	Yes	Yes
Mississippi	Yes	Yes	Yes
States without cooperation requirements			
Ohio	Yes	Yes	--
Tennessee	Yes	No	--
West Virginia	Yes	No	--

-- Data were unavailable in State administrative data.

Analytic Approach for Outcome Snapshot Analysis

Using the 1-month data for each State, the study team conducted point-in-time descriptive analysis to capture a snapshot of outcomes related to the cooperation requirement, such as SNAP benefit amounts, presence of child support orders, and receipt of child support payments as well as characteristics of SNAP households subject to the requirement. This analysis was conducted separately for States that had cooperation requirements and those that did not.

States With Cooperation Requirements

For study States that had cooperation requirements, the snapshot analysis provided information about outcomes related to the experience of those in the SNAP caseload who were subject to the cooperation requirement. Custodial parents were subject to the cooperation requirement in all of these States.

Among these States, custodial parent households subject to the cooperation requirement were identified by matching SNAP household data with child support data. No State had a single indicator for whether a household was subject to the requirement. Households subject to the

²⁸ West Virginia was in the process of planning to implement a cooperation requirement when it provided the data presented in this chapter. See Volume II, West Virginia State Profile for a description of implementation plans in that State.

requirement were identified as those who were either in compliance with the requirement, under sanction based on the requirement, or receiving a good cause exemption from the requirement.²⁹

Importantly, the snapshot analysis for States with the cooperation requirement did not provide information on the effect of the requirement. The outcomes observed in this analysis reflect a variety of policy, demographic, and economic circumstances in each State and should not be solely attributed to the cooperation requirement.

States Without Cooperation Requirements

For States without cooperation requirements, the snapshot analysis provided contextual information related to the hypothetical implementation of a cooperation requirement. For example, it provided the size and characteristics of the SNAP caseload likely to be affected by a cooperation requirement.

All study States implemented cooperation requirements that focused primarily on custodial parents. To identify custodial parents likely to be subject to a hypothetical implementation of a cooperation requirement, the study team analyzed single-parent SNAP households with children. Although this group likely includes custodial parents, other types of households could also include custodial parents, such as households that include custodial parents who have remarried. These other types of households could not be readily identified in the data. Therefore, the analysis of single-parent households with children who might be subject to a cooperation requirement should be interpreted as pertaining to a subset of all custodial parents.

States are permitted to require child support cooperation for noncustodial parents receiving SNAP as well. With this group in mind, the study team analyzed adults-only SNAP households. This group likely includes some SNAP households who would not be subject to the cooperation requirement because they do not have children. The group also likely excludes some households that would be subject to the requirement, such as households that include a noncustodial parent who has remarried or that is led by a single-parent with children from another relationship. Because of the limitations of adults-only households as a proxy for noncustodial parents and the fact States have not typically focused on noncustodial parents in implementation of cooperation requirements, the text focuses primarily on findings related to single-parent SNAP households.

²⁹ For some of these States, it was not possible to differentiate households under sanction due to noncooperation with the SNAP cooperation requirement from those under sanction due to noncooperation with the cooperation requirement administered under the TANF or Medicaid program. Therefore, this definition may include some households that were under sanction for failure to comply with a child support cooperation requirement in a program other than SNAP.

Outcome Snapshot Findings for States Implementing the Cooperation Requirement

Exhibit 3.2. Overview of outcome snapshot findings for study States implementing the cooperation requirement (Arkansas, Idaho, Kansas, Michigan, and Mississippi)

- It was common for SNAP households to be subject to the requirement. Between 20 percent and 30 percent of SNAP households across States were subject to the cooperation requirement.
- Most households subject to the requirement were determined to be in cooperation. Relatively few SNAP households were sanctioned for failure to comply. About 3 percent of SNAP households were sanctioned in two study States and less than 1 percent in the other two study States that provided data on sanctions.
- The outcome snapshot analysis could not identify the extent to which the cooperation requirement affected establishment of child support orders or distribution of child support payments to these households. ▲

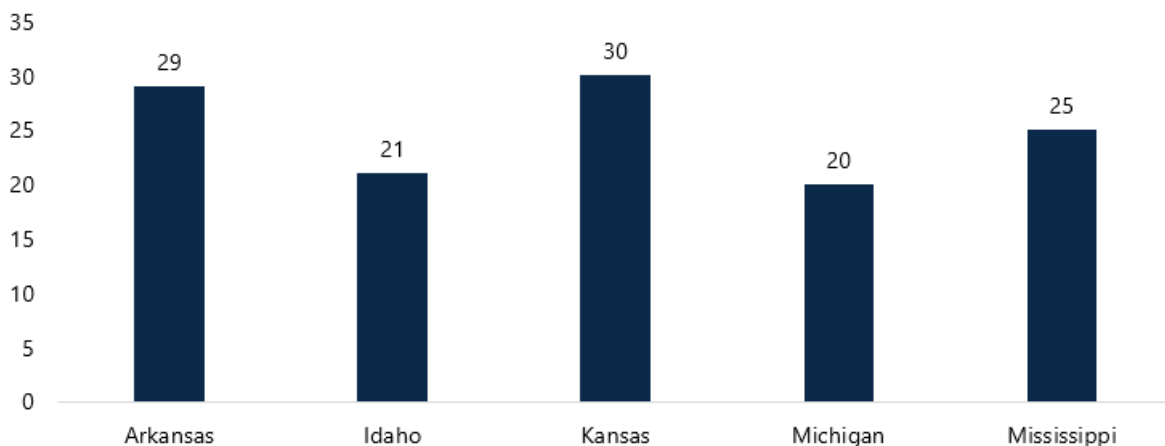
Among study States implementing the cooperation requirement, between 20 percent (Michigan) and 30 percent (Kansas) of SNAP households were subject to the cooperation requirement (Exhibit 3.3). SNAP households subject to the cooperation requirement tended to be headed by female parents in their mid-30s (Exhibit 3.4). The typical household subject to the requirement had one adult and two children, although there was variation across households and by State.



“I have heard of [good cause exemptions], but I didn't hear about it until my son. Back then, [for] my daughter they didn't tell me anything about a good cause or anything because I would have absolutely opted for that option... I went through a lot with him. He had kidnapped my daughter before and I just had a rough time. I almost lost her.”

—Custodial parent

Exhibit 3.3. Percentage of SNAP households subject to cooperation requirement in States with child support cooperation requirements



Source: State SNAP and child support administrative data.

Note: See Appendix C for a tabular presentation of these findings.

Exhibit 3.4. Average characteristics of custodial parent SNAP households subject to cooperation requirement in States with child support cooperation requirements

Characteristic of custodial parent SNAP household head	Idaho	Kansas	Michigan	Mississippi
Median age	35	34	34	34
Female (percentage)	92.6	93.0	93.5	97.4
Race and ethnicity (percentage) ^a				
Hispanic	--	--	--	--
Black, non-Hispanic	--	--	--	78.5
White, non-Hispanic	--	--	--	19.8
Other, non-Hispanic	--	--	--	0.6
Multiracial	--	--	--	1.2
Relationship to children in household (percentage)				
Parent	93.6	91.7	94.2	92.4
Grandparent	2.5	3.3	1.3	3.8
Relative caretaker	0.4	0.5	0.3	0.8
Nonrelative caretaker	0.2	0.1	0.7	0.2
More than one relationship	3.4	4.3	3.6	2.8
Custodial parent SNAP household composition				
Number of individuals in the household (household size)	3.5	3.4	3.4	2.7
Number of adults	1.2	1.3	1.3	1.2
Number of children	2.3	2.2	2.1	1.5
Number of custodial parents subject to cooperation requirement	9,618	30,372	141,415	44,302

Source: State SNAP and child support administrative data.

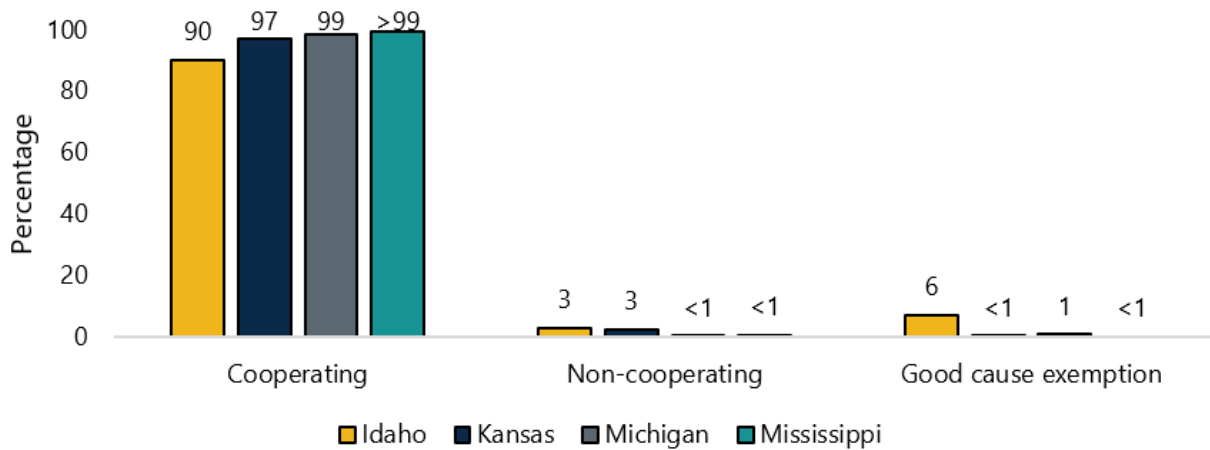
Note: SNAP households defined as subject to the cooperation requirement if they were identified as cooperating, under sanction, or had a good cause exemption. The percentage of SNAP households subject to the cooperation requirement is shown in Exhibit 3.3.

^a These values exclude SNAP households for whom information on race and ethnicity were missing from administrative records.

-- Data were unavailable in State administrative data.

A large majority of households headed by custodial parents were in compliance with the requirement or not subject to the requirement, ranging from 90 percent in Idaho to 99.5 percent in Mississippi (Exhibit 3.5). Failure to cooperate with the requirement was relatively uncommon. About 3 percent of SNAP households did not cooperate in Idaho and Kansas, and less than 1 percent of SNAP households did not cooperate in Michigan and Mississippi. About 6 percent of households in Idaho had a good cause exemption, which was a substantially higher rate than in the other three States. This difference could be due to Idaho not requiring documentation to support good cause claims. Idaho also allows a good cause exemption if the custodial parent cannot provide enough information that would allow the child support program to open a case, such as the noncustodial parent’s name and address.

Exhibit 3.5. Average child support cooperation status of custodial parent SNAP households in States with a cooperation requirement



Source: State SNAP administrative data.

Note: States varied in how they recorded compliance with the cooperation requirement. The cooperating status in this exhibit includes all SNAP households who were not recorded as non-cooperating and did not receive good cause exemptions. The status includes those who were in compliance with requests from the child support agency, as well as those who did not receive requests from the child support agency because they already had child support orders in place, the noncustodial parent was incarcerated or deceased, or other reasons. Idaho does not require clients to provide documentation to support good cause claims. Because these data reflect a single point in time, it is possible that some non-cooperating participants may subsequently begin cooperating in later months. For participants who applied for SNAP in a given month, a noncooperation status may reflect an existing TANF sanction, not a SNAP sanction.

Patterns relating to paternity establishment, child support order establishment, and child support order amounts varied across the States. Among custodial parents, having paternity established for at least one child ranged from 72 percent in Idaho to 90 percent in Kansas (Exhibit 3.7). For these same parents, having a child support order established for at least one child ranged from 65 percent in Michigan to 92 percent in Idaho, while having orders established for all children ranged from 33 percent in Michigan to 69 percent in Idaho. Among custodial parent SNAP households with at least one child support order, the monthly order amount summing across all household orders, on average, ranged from a low of \$288 in Mississippi to a high of \$426 in Idaho. The average amount of child support payments received by custodial parents tended to be around \$200,

Exhibit 3.6. Features of child support orders

What are the different types of child support arrears?

Arrears are the amount of child support orders that have not been paid. Most child support payments are allocated to the custodial parent and children. In these cases, insufficient child support payments accrue as family-owned arrears. However, if the custodial parent is receiving TANF benefits, some States retain child support payments to offset the TANF benefits. In such cases, child support payments less than the order amount accrue as State-owed arrears.

What are zero-dollar orders?

Some child support orders do not include a payment for current support, such as orders that require only medical support, those with no amount due because of joint custody, or those with no amount due because the noncustodial parent has very low income or is incarcerated. See Sorensen (2018) for more details. ▲

ranging from \$161 in Mississippi to \$239 in Kansas.³⁰ On average, the total amount of arrears owed to these households (in January 2023 dollars), was between \$7,000 and \$9,000 in Idaho, Kansas, and Mississippi, but was substantially lower in Michigan (\$859). The total amount of arrears owed to the State (in January 2023 dollars), on average, was much larger in Kansas (\$3,296) than in the other three States (ranging from \$219 in Mississippi to \$457 in Idaho). Exhibit 3.6 discusses different types of child support arrears.

Exhibit 3.7. Average child support case characteristics of custodial parent SNAP households who are already connected to child support in States with child support cooperation requirements

Child support characteristics of custodial parent SNAP households	Idaho	Kansas	Michigan	Mississippi
Have paternity established for at least one child (%)	71.5	89.4	76.4	79.5
Have paternity established for all children (%)	--	81.0	--	63.4
Have child support orders established for at least one child (%)	92.2	81.5	65.4	79.2
Have child support order established for all children (%)	68.9	46.8	33.1	39.8
Among custodial parent participants who have at least one child support order				
Have at least one order of \$0 (%)	29.3	41.6	38.1	20.7
Average number of orders established	2.2	1.5	1.4	1.3
Total order amount across orders (\$)	426	416	332	288
Monthly amount of child support paid by the noncustodial parents, total across household child support orders (\$)	--	255	244	163
Monthly amount of child support received by the custodial parent, total across household child support orders (\$)	220	243	219	161
Amount of arrears owed to household or State, total across household child support orders (\$)				
Family-owed arrears	6,955	9,024	859	7,579
State-owed arrears	457	3,287	244	219
Number of custodial parents connected to child support	9,618	30,372	141,415	44,302

Source: State SNAP and child support administrative data.

-- Data were unavailable in State administrative data.

For the two States that had the cooperation requirement and were able to provide both child support and TANF data (Michigan and Mississippi), there were differences in the percentage of SNAP households subject to the cooperation requirement that also participated in TANF. In Michigan, about 8 percent of custodial parent SNAP households subject to the cooperation requirement participated in TANF compared to only 1 percent in Mississippi.³¹ Among these households, less than 2 percent were identified as not cooperating in Michigan and less than 1 percent were identified as not cooperating in Mississippi.

³⁰ This amount reflects the child support payment made by the noncustodial parent less the amount retained by the State to offset TANF payments to custodial parents.

³¹ Please see Appendix C, Exhibit C.5 for a tabular presentation of these findings.

Outcome Snapshot Findings for States Without the Cooperation Requirement

Exhibit 3.8. Overview of outcome snapshot findings for study States not implementing the cooperation requirement (Ohio, Tennessee, and West Virginia)

- If these States were to implement a cooperation requirement that applied only to custodial parents, between 24 percent and 32 percent of SNAP households might be subject to it. These rates are similar to those found in States implementing the cooperation requirement.
- Single-parent SNAP households with children tended to be headed by women in their mid-30s who live in households with one adult and two children. These characteristics were similar to those of custodial parent SNAP households subject to the cooperation requirement in States that had the requirement.
- Findings from Ohio, the one State without the cooperation requirement that provided child support data, indicate that the number and size of child support orders for single-parent SNAP households with children are in a similar range to those found in States implementing the cooperation requirement. ▲

Prevalence of Households That Might Be Subject to the Requirement

For study States that did not have the cooperation requirement (Ohio, Tennessee, and West Virginia), approximately 24 percent to 32 percent of SNAP households were single-parent households with children (Exhibit 3.10). These households likely are ones that could be subject to this requirement if these States adopted a cooperation requirement policy that affected custodial parents. If the States implemented the requirement in a way that included noncustodial parents (which is not typical), adults-only SNAP households could be among those households subject to the requirement.

A key goal of implementing the cooperation requirement is to connect households to the child support system. Thus, it is of interest to examine how many households that might be subject to the requirement are already connected to child support. SNAP administrative records in Tennessee and West Virginia indicated whether the SNAP household reported payment, receipt, or deduction of child support payments; child support administrative records were not available for these two States. Ohio provided both SNAP administrative records on reported child support activity as well as child support data. The study team examined connection to child support for SNAP households that could be subject to the cooperation requirement if the State were to implement it.

A substantial percentage of single-parent SNAP households with children were not connected to child support. In Ohio, which has the most complete information on connection to child support, 41 percent of these households were not connected to child support. In Tennessee and West Virginia, these values were 72 percent and 78 percent, respectively. The Tennessee and West Virginia values do not include information from the child support administrative records, which may explain why their values are higher than Ohio.

Exhibit 3.9. Overview of outcome snapshot findings for adults-only SNAP households in study States not implementing the cooperation requirement (Ohio, Tennessee, and West Virginia)

Outcomes for adults-only SNAP households can provide some insight into a group that includes some households that would be subject to the requirement if one were implemented in a way that included noncustodial parents, although some of these adults would not be subject to the requirement because they do not have children and some noncustodial parents could be in SNAP households other than adults-only households. Key findings for this group include:

- Adults-only households represent a substantial portion of the SNAP caseload, ranging from 35 (Ohio) to 41 (West Virginia) percent in study States without cooperation requirements.
- Most heads of adults-only SNAP households were not connected to child support. For example, in Ohio, which provided linked SNAP and child support records, 24 percent of adults-only household heads younger than age 60 were connected to child support. The low levels of child support connection for adults-only households could reflect that many of the adults who are noncustodial parents were not party to child support orders or that many of the adults were not noncustodial parents. Thus, it is difficult to assess how many of these SNAP households would be subject to the requirement. ▲

Exhibit 3.10. Percentage of SNAP households that might be subject to the cooperation requirement in States without child support cooperation requirements (percentage)

Household type	Ohio	Tennessee	West Virginia
Single-parent SNAP households with children	29.0	32.3	24.0
Among single-parent SNAP households with children			
Currently connected to child support	59.2	28.3	22.6
Not currently connected to child support ^a	40.8	71.8	77.4
Number of SNAP households	743,625	418,209	178,132

Source: State SNAP administrative data and Ohio child support administrative data.

Note: Single-parent SNAP households with children served as a proxy for custodial parents who could be subject to the cooperation requirement. This proxy included some SNAP households that may not be affected by a cooperation requirement because not all single-parent SNAP households with children require child support orders.

^a Ohio provided child support administrative data. For that State, households were considered currently connected to child support if SNAP records included reported payment, receipt, or deduction of child support payments or could be positively linked to child support administrative data. For Tennessee and West Virginia, connection to child support was based only on SNAP records. The difference in data sources could explain why these values are higher than the values for Ohio.

Demographic Characteristics of Households That Might Be Subject to the Requirement

Demographic characteristics for SNAP households were generally similar among households that might be subject to the cooperation requirement across the three study States without requirements, but there were meaningful differences in TANF participation and TANF sanctions for noncooperation. Single-parent SNAP household heads with children tended to be female parents in their mid-30s who were living in households with one adult and two children (Exhibit 3.11). The percentage of single-parent SNAP households with children that participated in TANF ranged from 6 percent in Tennessee to 10 percent in Ohio. The percentage of those receiving TANF who were sanctioned for noncooperation with child support was substantially higher in Ohio (about 11 percent) than in West Virginia or Tennessee (1 percent or less).

Exhibit 3.11. Average characteristics of single-parent SNAP households with children that might be subject to cooperation requirement in States not currently implementing the requirement (percentage unless noted otherwise)

Characteristic of household head	Ohio	Tennessee	West Virginia
Median age (years)	34	34	35
Female	93.1	93.2	89.3
Race and ethnicity			
Hispanic	--	4.2	--
Black, non-Hispanic	--	42.9	--
White, non-Hispanic	--	52.0	--
Other, non-Hispanic	--	0.7	--
Multiracial	--	0.2	--
Relationship to children in household			
Parent	89.3	91.0	88.9
Grandparent	4.6	5.0	6.5
Relative caretaker	0.8	0.7	0.9
More than one relationship	5.3	3.4	3.8
Household composition			
Number of individuals in the household (household size)	3.4	3.3	3.1
Number of adults	1.2	1.2	1.2
Number of children	2.1	2.1	1.9
Single-parent SNAP households with children that participate in TANF	10.2	6.3	7.6
Among single-parent SNAP households with children that participate in TANF:			
Percentage with sanction for noncooperation with child support	10.6	1.1	0.1
Number of single-parent SNAP households with children	212,150	134,682	41,083

Source: State SNAP administrative data.

-- Data were unavailable in State administrative data.

Child Support Outcomes for Households That Might Be Subject to the Requirement

Ohio was the only State not currently implementing the cooperation requirement that supplied child support records. This information enabled the study team to examine child support case characteristics for SNAP households already connected to child support for a State not currently implementing the cooperation requirement. Among single parent SNAP households with children already connected to child support, about 78 percent had paternity established for all children, and approximately 65 percent had a child support order established for all children (Exhibit 3.12). Among SNAP households with children who have at least one child support order, the average number of orders was two, and almost half of these SNAP households had at least one order with no required payment amount, known as a zero-dollar order (see Exhibit 3.6). The average household total order amount across orders was \$338. On average, the total amount of

arrears owed to households across orders was about \$8,880; the total amount of arrears owed to the State across orders was about \$2,200.

Exhibit 3.12. Average child support case characteristics of single-parent SNAP households with children and already connected to child support in Ohio, a State not currently implementing the requirement (percentage unless noted otherwise)

Child support case characteristic	Ohio
Have paternity established for at least one child	92.5
Have paternity established for all children	77.6
Have child support orders established for at least one child	94.2
Have child support order established for all children	65.0
Number of single-parent SNAP households connected to child support	125,583

Source: State SNAP and child support administrative data.

Note: Calculations have been restricted to SNAP households that could be linked to child support data. Because not all SNAP households connected to child support could be positively linked, these numbers are lower than those presented in Exhibit 3.3. The percentage of sample members with child support orders established for at least one child exceeds the percentage with paternity established for at least one child. This finding could result from inconsistency in recording paternity establishment for cases with a presumption of paternity (such as children born to married parents) or from other data inconsistencies.

Discussion of Outcome Snapshot Findings

In study States with the cooperation requirement (Arkansas, Idaho, Kansas, Michigan, and Mississippi), it was common for SNAP households to be subject to the requirement but relatively few were sanctioned for failure to comply. In all these States, implementation of the requirement focused primarily on custodial parents. Between 20 percent and 31 percent of SNAP households across States were subject to the cooperation requirement; whereas, 3 percent of SNAP households were sanctioned in two States (Idaho and Kansas) and less than 1 percent in the other two States (Michigan and Mississippi). Findings indicated that child support was an important but modest source of income for households with child support orders, amounting to approximately \$200 per month. However, the outcome snapshot analysis could not identify the extent to which the cooperation requirement affected establishment of child support orders or distribution of child support payments to these households.

If the cooperation requirement were to apply only to custodial parents, between 23 percent and 32 percent of SNAP households might be subject to the requirement. These rates were similar to those found in study States that had a cooperation requirement. Between 6 percent and 10 percent of these SNAP households were participating in TANF and subject to the TANF cooperation requirement.³²

Moreover, the characteristics of single-parent SNAP households with children in study States that did not have a cooperation requirement were similar to those of custodial parent SNAP households that are subject to the cooperation requirement in terms of age and gender of household head and household size and composition; in the State for which child support

³² See Exhibit C.5 for a tabular presentation of these findings.

records were available (Ohio), child support case characteristics were similar as well. These findings suggest that if study States that are not currently implementing the cooperation requirement were to implement a cooperation requirement that affected custodial parents, there might be similarities to study States that are implementing the cooperation requirement in terms of the share of SNAP households subject to the requirement and the characteristics of these households.

3.2. Effects on Outcomes Relevant to the Cooperation Requirement

Unique among States participating in the study, Kansas provided data that made it possible to examine how outcomes relevant to the requirement—such as SNAP benefit amount, number of child support orders, and amount of child support received by households—changed with implementation of the cooperation requirement. These data provided information on the two years before and after implementation of the cooperation requirement (July 2013 to July 2017) from both SNAP and child support administrative record systems. This section describes the Kansas effects analysis, beginning with a description of the analytic sample and methods used to conduct the analysis. Then, the findings are presented and their implications are discussed.

Exhibit 3.13. Key findings related to effects on outcomes relevant to the cooperation requirement

- The average SNAP benefit amount for a sample of SNAP participants subject to the requirement decreased by \$65 per month after Kansas implemented the cooperation requirement, controlling for other factors. This could indicate that some households did not comply with the requirement and lost benefits as a result.
- Consistent with policy goals, paternity establishment and child support orders increased by 15 percent and 5 percent, respectively, for SNAP households with children after Kansas implemented the cooperation requirement.
- Despite the increase in child support orders, there was no corresponding increase in the amount of child support payments households received among all households, including those with no child support orders. This lack of change is not consistent with the policy goal of increasing economic support for households.
- The statistical models that estimated changes in outcomes associated with implementing the cooperation requirement controlled for available factors that could affect outcomes relevant to the requirement. However, it is possible that some of the observed changes in outcomes were related to other concurrent policy or context changes. ▲

Analytic Sample and Methods for the Effects Analysis

Analytic Sample

The study team identified an analytic sample that enabled estimation of changes in outcomes that can be plausibly attributed to implementing the requirement, taking into account three considerations. The first consideration in meeting this goal was selecting a set of SNAP households for the analysis such that changes in outcomes might reflect implementation of the requirement rather than changes in the sample. For this reason, the analytic sample included a set of SNAP cases for whom outcomes were observed before and after Kansas implemented the requirement.

A second consideration in identifying the analytic sample was that it includes only those for whom outcomes would be expected to change in response to the requirement and excludes households not subject to the requirement. Because implementation of the requirement in Kansas focused on custodial parents, the sample included SNAP cases with children and excluded cases without children.³³

A third consideration in selecting the sample was accounting for the logistics of the rollout of the requirement. In Kansas, existing SNAP cases were not subject to the cooperation requirement until they recertified.³⁴ Unfortunately, the Kansas data did not record the date of recertification. However, because almost all SNAP cases in Kansas must be recertified after 12 months of benefit receipt, those cases would have been subject to the cooperation requirement by the 13th month after implementation of the cooperation requirement.³⁵ The study team accounted for this pattern by identifying SNAP cases with children that had at least 6 months of data before Kansas implemented the cooperation requirement and 6 months of data beginning 1 year after implementation.

Analytic Methods

The study team tested whether the findings of the analysis were sensitive to alternate sample identification choices, such as requiring less data before and after implementation of the requirement and restricting the sample to those who received some child support payments. Findings from these alternative specifications are described in appendix C.

To estimate the relationship between outcomes and implementation of the cooperation requirement, the study team estimated an interrupted time series model with fixed effects for each outcome. This type of statistical model makes use of the monthly timeline of data available and controls for factors that are likely associated with the outcomes. This approach reduces the chance that the key model estimates reflect changes in the outcomes associated with factors other than the cooperation requirement. Specifically, the model controls for all SNAP case-level characteristics that do not change over time through indicator variables for each SNAP case, referred to as fixed effects. For example, the SNAP case-level fixed effects account for the race and sex of the primary SNAP applicant as well as any other characteristics that are unchanging. Additionally, the model includes current employment rates to account for changes related to economic environment. The model also includes a linear time trend to account for general trends in the outcomes that may vary from month to month.

The study team estimated a model for outcomes relevant to the cooperation requirement and available in administrative records, including SNAP benefit amount, paternity establishments, child support orders, total child support order amount across orders, total distribution amount

³³ The Kansas legislation that required cooperation does not specify which parent is required to cooperate. However, the SNAP policy manual specifies that implementation of the policy applies to custodial parents. See Chapter 2 for further details.

³⁴ See Volume II: State Profiles for additional details on the implementation of the cooperation requirement in Kansas.

³⁵ One exception is that Kansas uses a 24-month certification period for households in which all adult members are elderly or disabled.

across orders, family-owed arrears across orders, and State-owed arrears across orders. To assess whether the findings were sensitive to modeling choices, the study team estimated alternative statistical models, including a version that did not control for case-level fixed effects and instead only controlled for specific case-level attributes (household size and the sex and age of the primary applicant) and unemployment rate. Results from these alternative specifications are discussed in Appendix C.

Limitations of Methodology

Although findings from this analysis provide useful information on the changes in outcomes that were associated with the cooperation requirement, they should be interpreted with caution. Outcomes could have changed during the sample period for reasons other than the cooperation requirement. The analysis attempted to isolate the changes in outcomes associated with the requirement from changes due to other factors, such as characteristics of the primary SNAP applicant, household-level characteristics, and economic context factors. However, there are likely factors not included in the model that would be expected to influence the outcomes. For example, any policy or implementation changes other than the cooperation requirement made during the analysis period and affecting outcomes related to child support would influence findings from the model. As a result, the estimated changes attributed to the cooperation requirement by the model could be larger or smaller than the true effect of the cooperation requirement, depending upon the unknown effects of such factors on the outcomes.



“Like I want him to pay, but then I don't want it to be to the point where what if he doesn't pay? And he's not going to -- you all can't make him pay child support. It's like what if he doesn't pay? And then what if he does pay like \$10 a month or \$20 a month or something so insignificant? And he probably is so vindictive that he probably will just get paid under the table money.... Like are you going to even go get a real job? And you'll just probably make money under the table, so you can hide your money, so you don't have to pay child support. I probably wouldn't even get anything.”

—Custodial parent

A second reason to cautiously interpret the findings is that even if the model did appropriately account for all relevant factors, the estimates of how outcomes changed in Kansas during this time might not reflect the changes other States would experience. For example, Kansas used privatized vendors for child support services and had a data system that was well suited for sharing data across programs. States with different contexts might experience different changes than those experienced by Kansas.

Key Findings From the Effects Analysis

After Kansas implemented the cooperation requirement, the average SNAP benefit amount decreased by \$65 for single-parent SNAP households with children, while controlling for other factors (Exhibit 3.14). This change was statistically significant and reflected a 14 percent reduction in the average SNAP benefit amount.

Among outcomes related to child support, paternity establishments and child support orders increased after implementing the requirement, average State-owed arrears decreased, and other

outcomes remained about the same. The average number of paternity establishments increased by 0.15, equivalent to 15 more paternity establishments per 100 SNAP cases with children (Exhibit 3.14). This change was statistically significant and reflected a 15 percent increase in paternity establishments relative to the period before implementing the requirement. The average number of child support orders increased by 0.04, a statistically significant difference that was equivalent to 4 additional orders per 100 SNAP cases with children and represented a 5 percent increase. The average number of child support orders with no payment amount—known as zero-dollar orders (see Exhibit 3.6)—increased by 0.02, a statistically significant difference that represented a 29 percent increase and indicated that half of the total increase in child support orders came from increases in zero-dollar orders.

Despite the small increase in the number of child support orders, there was no change in the total value of child support orders summing across orders in place for each SNAP household with children, nor was there a change in the amount of child support payments received by these households. Changes in these outcomes were small and not statistically significant (Exhibit 3.14). Further, there was no change in average family-owed arrears summing across orders. However, there was a decrease in average State-owed arrears associated with SNAP household child support orders of \$116, or 7 percent relative to the period before implementing the requirement. Note that the implementation of the cooperation requirement in Kansas was not intended to affect arrears; it did not include any measures that would directly affect arrears, such as arrears forgiveness.

Exhibit 3.14. Child support and SNAP outcomes among custodial parent SNAP households, before and after implementation of cooperation requirement in Kansas

Outcome	Mean before implementation	Mean after implementation	Difference
SNAP benefit amount (\$)	466	402	-65*
Paternity establishments	1.03	1.18	0.15*
Child support orders	0.79	0.83	0.04*
Child support orders with no payment amount	0.07	0.09	0.02*
Child support order amount, total across household child support orders (\$) ^a	141	141	0
Child support payments distributed to household, total across household child support orders (\$) ^a	74	73	-1
Family-owed arrears, total across household child support orders (\$) ^a	3,571	3,539	-31
State-owed arrears, total across household child support orders (\$) ^a	1,700	1,584	-116*
Number of custodial parent SNAP households	26,409	25,478	

Source: Kansas SNAP and child support administrative data.

Note: Models include case fixed effects that control for characteristics that do not change over time. They also control for local unemployment rate. The analysis includes all SNAP households with children with 6 months of outcome data before and after the policy change. The analysis is conducted at the month level and includes 536,688 household-month observations before implementation and 302,029 household-month observations after implementation. Sample sizes vary by outcome. Sensitivity analyses are presented in appendix C.

^a SNAP households with no child support orders are recorded as having \$0 for this outcome.

* Statistically significant at the 5 percent level.

Discussion of the Effects Analysis

Kansas required that custodial parents in the SNAP caseload engage with the child support agency to increase paternity establishment and child support orders, with the goal of increasing child support payments and support for the family. Consistent with these policy goals, paternity establishment and the number of child support orders increased for single-parent SNAP households with children after Kansas implemented the cooperation requirement. This would be expected if at least some households complied with the requirement. The finding that the average SNAP benefit amount decreased after implementing the cooperation requirement might suggest that there were some households that did not comply with the requirement and lost benefits as a result.

Despite the increase in child support orders, there was no corresponding increase in the child support order amount or in the distribution of child support payments to households.³⁶ This lack of change is inconsistent with the policy goal of increasing economic support for households. This pattern is consistent with the fact that many of the new child support orders were zero-dollar orders—that is, orders with no payment requirement (see Exhibit 3.6).

Although the model that estimates effects controls for factors that could affect the outcomes relevant to the requirement, it is possible that some of the observed changes in outcomes are related to other concurrent policy or context changes. For example, privatization of child support services in Kansas occurred not long before the State implemented the cooperation requirement, and some of the effects of privatization could have spilled over into the period after implementing the requirement. The effects of other factors not accounted for in the analysis on outcomes could have been positive or negative; in either case, study estimates of the effects of the cooperation requirement would be distorted. Despite these caveats, findings suggest that although some outcomes changed when Kansas implemented the cooperation requirement, the value of child support payments received by households did not increase.

3.3. Costs of the Cooperation Requirement and Effects Net of Cost

The study team analyzed the costs of implementing the cooperation requirement in Kansas to provide context for the estimates of the effects of the requirement. This section begins with a discussion of cost estimates based on cost tracking workbooks completed by staff from the Kansas SNAP and child support agencies. Next, the section describes an analysis that combined cost estimates with estimates of the benefits of the requirement derived from the effects analyses. This cost-benefit analysis examined how various groups were affected by the policy, including State agencies, custodial parents, and noncustodial parents. The analysis also examined net benefits for society—that is, for the Kansas community at large and reflecting the perspectives of all groups.

³⁶ This analysis includes all households. Households with no child support orders have child support order and child support payment receipt amounts of \$0.

Cost Analysis Methods

In implementing the cooperation requirement, States incur upfront costs to develop or revise data systems that support the requirement and to create required procedures for staff implementing the requirement. States also incur ongoing costs related to continuous maintenance of the requirement. The study team designed the cost analysis to capture these initial and ongoing costs and to provide separate estimates of the costs incurred by the agencies involved.

Program staff from the Kansas SNAP and child support agencies completed cost workbooks that collected information on the amount of time spent during the start-up phase and on activities related to the cooperation requirement during the reporting period. The study team combined these time estimates with information on staff salary and fringe benefit amounts to generate monetary cost estimates for this labor. In addition to direct labor costs, the workbook collected information on system, indirect labor, and other costs.³⁷

Several contextual factors should be considered when interpreting cost findings for Kansas. First, the Kansas child support program is State-administered with services provided by private vendors at the county-level through contracts with the State, which pay the vendors based on caseload size. Because of the increase in caseloads due to referrals from SNAP, the State had to increase the vendor contracts. From 2015 to 2021, the State paid vendors \$150 for every referral from the SNAP agency that led to a new child support case. These per-case payments accounted for a large majority of costs incurred by the State. In addition, Kansas did not require any system enhancements to implement the requirement because the State's data systems already facilitated automated referrals to child support for TANF and child care cases as well as voluntary referrals from SNAP to child support.

Findings From the Cost Analysis

The cost analysis included estimates of total start-up and ongoing costs, cost by agency, and cost per participant.

Total Start-Up and Ongoing Costs

The total start-up cost associated with implementing the cooperation requirement in Kansas was \$11,699. As previously discussed, Kansas did not require data system enhancements to implement the requirement; therefore, start-up costs were not substantial and were likely lower than would be experienced by States that did require enhancements. In fact, Kansas did not report any system-related or other indirect labor costs during the start-up phase. All costs incurred by the State agencies were direct labor costs related to planning and staff training, developing the query to identify the number of cases child support vendors would serve due to the requirement, and reviewing and approving vendor payments.

³⁷ All costs were converted to July 2017 dollars to adjust for inflation and facilitate comparisons across analyses. To further facilitate comparisons, cost estimates from the 6-month reporting periods were converted to annual values. These costs are before federal reimbursement for administrative costs.

The processes that enabled implementation of the cooperation requirement provided value over a number of years of implementation. For that reason, the annualized cash flow value of the start-up cost is calculated when spread over 20 years, which is the flow of annual payments that would be equivalent to the lump-sum start-up costs based on methods similar to those used to calculate annuities. These calculations indicated that the annual cash flow value would be minimal at \$939 (Exhibit 3.15). This value would be smaller if spread over a greater number of years and larger if spread over fewer but is not a substantially large value under any assumption.

Compared to start-up costs, ongoing costs in Kansas were substantial. The total ongoing cost to implement the cooperation requirement for 1 year was \$1,341,922, which amounts to 99.9 percent of the State’s total cost burden. Almost all ongoing costs (99.8 percent) were direct payments made to the child support services vendors for system, indirect labor, and other costs. Ongoing costs incurred by the State SNAP and child support agencies amounted to less than 0.1 percent of total costs and were related to direct staff labor costs.

Combining the annual cash flow value of start-up costs and ongoing annual costs, the total administrative cost to implement the requirement was \$1,342,861. As noted, virtually all of this amount was related to direct payments to the child support services vendors.

Because almost all costs associated with the cooperation requirement were related to the child support services vendor charges that were covered by the child support agency, almost all of the cooperation requirement–related costs were borne by the child support agency (99.8 percent; Exhibit 3.15).

Exhibit 3.15. Total annualized, start-up, and ongoing cost of implementing cooperation requirement in Kansas

Cost category	Amount (\$)	Percentage of total costs
Total cost		
Total annualized costs (\$)	1,342,861	100
By type of cost		
Annual cash flow value of start-up costs ^a	939	0.1
Ongoing annual costs	1,341,922	99.9
Direct labor	2,344	0.2
System, indirect labor, and other costs	1,339,578	99.8
By agency		
SNAP agency	3,237	0.2
Child support agency	1,339,624	99.8

Note: All dollar values are denominated in July 2017 dollars. All start-up costs were direct labor. All system, indirect labor, and other ongoing costs were direct payments made to the child support services vendor. States pass on 66 percent of the cost for child support administration to the federal government.

^a The annual cash flow value of start-up costs assumes the \$11,699 lump-sum start-up costs are annualized over 20 years with a 5 percent interest rate.

Costs per SNAP Participant and per SNAP Participant Subject to the Cooperation Requirement

Dividing the total annual cost of implementing the cooperation requirement by the number of SNAP participants in 2021, the annual cost per SNAP participant was about \$12 (Exhibit 3.16). This calculation does not account for the fact that most SNAP households are not subject to the requirement. The cost per SNAP household subject to the requirement was \$35. Note that the Kansas child support vendor only collected a fee, in the amount of \$150, for new cases resulting from a referral from the SNAP agency.³⁸

Exhibit 3.16. Cost of implementing cooperation requirement in Kansas per SNAP participant and per SNAP participant subject to the requirement

Outcome	Value
Total annual costs (\$)	\$1,342,816
Number of SNAP participants	107,978
Cost per SNAP participant	\$12
Number of SNAP participants subject to cooperation requirement	38,530
Cost per SNAP participant subject to cooperation requirement	\$35

Notes: All dollar values are denominated in July 2017 dollars. The total annualized cost includes annual ongoing cost and the annualized cash flow value of start-up costs. SNAP costs for implementing the requirement are subject to a 50% reimbursable State administrative expense. Therefore, 50% of the SNAP costs are incurred by the federal government. States pass on 66 percent of the cost for child support administration to the federal government.

Cost-Benefit Analysis Methods

The cost-benefit analysis combined findings from the cost and effect analyses to assess the net benefits of the cooperation requirement. The cost of implementing the requirement was subtracted from estimates of the benefits derived from changes in outcomes associated with the requirement. The net benefits were calculated separately from four perspectives: (1) the government (reflecting the SNAP and child support agencies), (2) custodial parents and children, (3) noncustodial parents, and (4) society. The policy’s net benefit to society equals the sum of net benefits for noncustodial parents, custodial parents and children, and the government. The main net benefit estimates are presented below. Appendix B presents net benefit estimates under alternate assumptions, which are substantively similar to the main estimates.

The calculation of net benefits must focus on benefits that are expressed in dollar value so that they are directly comparable to program costs, which are also expressed in dollar values. Thus, a key step in conducting the cost-benefit analysis was developing a strategy for including changes in outcomes that could be measured in monetary terms. Some outcomes, such as SNAP benefit amounts, were already denominated in dollars and could be used directly in the calculations. Other outcomes, such as increased child support orders, had to be converted to dollar values based on information available from other sources. Appendix B describes how the study team

³⁸ This value does not include costs for new cases, such as enforcement costs borne by courts and law enforcement. Potential costs for actors other than the agencies from whom the study team collected data are considered in the cost-benefit analysis discussed in the next section.

valued effects for each outcome, includes detailed sources for the valuation estimates, and presents alternate valuation estimates.

Although the cost-benefit analysis provides important context for considering the effects of implementing the cooperation requirement in Kansas, it is important to keep in mind the limitations of the analysis. Estimates of the change in outcomes associated with implementing the cooperation requirement are a key input in the cost-benefit analysis. Thus, all caveats for interpreting those findings also apply to the cost-benefit findings. Most importantly, the estimated changes in outcomes might reflect factors other than the cooperation requirement if the statistical models used in that analysis did not adjust for all factors that affected outcomes. Additionally, not all potential effects of the cooperation requirement were included in the analysis because some effects are difficult to measure and express in dollar values. For example, the analysis does not account for changes in food security status that might result from changes in SNAP benefit receipt.

Findings From the Cost-Benefit Analysis

Estimated Benefits

Findings from the effects analysis estimated an increase in child support orders after the policy was implemented (Exhibit 3.14). This increase has implications for administrative costs to the government, as enforcing child support orders incurs costs related to contempt hearings, court costs, and other costs. To account for these costs, the study team applied an estimate of annual enforcement cost of new cases, excluding labor from child support staff (which are accounted for in the cost estimates).³⁹ These estimates indicated that the additional orders associated with the cooperation requirement led to \$113 in costs per case to the government and to society as a whole.

The impact estimates indicated that formal child support payments distributed to custodial parents decreased slightly after implementing the cooperation requirement. After applying the annual value of the impact per SNAP participant subject to the cooperation requirement, this decrease represented a reduction of \$12 for custodial parents (who receive less in child support payments) and an increase of \$12 for noncustodial parents (who pay less in child support payments).

In addition to decreased child support payments, findings from the impact analysis estimated a decrease in average SNAP benefit payments after implementing the cooperation requirement. We extrapolated this impact for a hypothetical SNAP participant who receives benefits for 12 months. The impact suggests a \$780 gain for government (which pays less in benefits) and a \$780 loss for custodial parents and children (who receive less in benefits). Reduced SNAP benefit

³⁹ This estimate is based on business-as-usual child support enforcement costs averaged over two years (Moore et al., 2019). Use of this estimate implicitly assumed that enforcement costs per case would have been the same for new cases established through the Kansas cooperation requirement. It is possible that the estimate overstates these costs given the number of child support orders with no payment requirement for the Kansas sample.

payments also mean reduced administrative costs for making those payments. Based on average SNAP administrative costs, this reduction translates into a \$55 gain for the government.

Summing across all monetized impacts, estimates indicate that the cooperation requirement led to gains of \$722 per SNAP household for the government and \$12 for noncustodial parents, whereas there were losses of \$792 for custodial parents and children. Summing across perspectives—not accounting for the cost of implementation—the impacts of the policy resulted in a loss of \$58 per SNAP household subject to the cooperation requirement for society.

Net Benefit Estimates

Exhibit 3.17 shows results from the net benefit analysis, which combines the cost and benefit estimates described above. The Kansas cost analysis indicated that the cost of the policy to society was \$35 per SNAP household subject to the cooperation requirement. Accounting for the cost of implementation and the monetized impacts, findings suggest the policy resulted in a net loss to society of \$93 per SNAP household subject to the cooperation requirement.

Exhibit 3.17. Estimates of net benefits (in monetary terms) per SNAP case referred to child support, by perspective (dollars)

Benefit or costs	Perspective			
	Government ^a	Custodial parent and children	Noncustodial parent	Society
Per participant				
Changes related to new order establishments				
Increased child support enforcement activities ^b	-113	0	0	-113
Change in formal child support payments from noncustodial parent to custodial parent ^c	0	-12	12	0
Reduced custodial parent SNAP benefits				
Reduced program benefit payments ^d	780	-780	0	0
Reduced program administrative costs associated with payments ^e	55	0	0	55
Total annual benefits	722	-792	12	-58
Costs				
Total annualized cost per SNAP participant subject to cooperation requirement	-35	0	0	-35
Net benefits				
Total benefits net of total annualized cost	686	-792	12	-93

Note: All values were adjusted for inflation and reflect prices as of July 2017. For estimates based on alternate assumptions, see appendix C. Net benefit estimates may not equal the sum of component values due to rounding.

^a Includes SNAP and child support agencies.

^b Based on estimated changes in the number of child support orders and the average child support enforcement costs for one case for 1 year, as drawn from Moore et al. (2019).

^c Based on estimated changes in child support payments distributed to custodial parents. The study data do not include child support payments distributed to the State.

^d Based on estimated changes in the SNAP benefit amounts applied over 12 months.

^e Derived by multiplying the amount of benefits received by a percentage that reflects the estimated administrative costs of SNAP (7 percent) from the U.S. House of Representatives Committee on Ways and Means.

Discussion of the Cost-Benefit Analysis

The cost analysis indicated that the costs to begin implementing the cooperation requirement were modest at \$11,699, or \$939 per year when annualized over 20 years. These low costs were consistent with the policy context in Kansas. The State had well-developed data infrastructure and did not require any system enhancements to implement the requirement. The State’s data systems already facilitated automated referrals to child support for TANF and child care cases as well as voluntary referrals from SNAP to child support. Information collected from the implementation analysis suggested that Kansas might have been unusual in this regard. For example, Arkansas invested about \$600,000 in data system enhancements as part of preparing to implement the cooperation requirement (see Exhibit 3.18).

Ongoing costs for implementing the requirement were \$1.34 million, or about \$35 per SNAP household subject to the requirement.⁴⁰ Almost all of these ongoing costs represented payments by the child support agency to the third-party vendor that conducted implementation activities. The use of private vendors in Kansas is an important contextual factor to keep in mind when interpreting these findings.

The ongoing cost of implementing the cooperation requirement could be justified if it led to sufficiently favorable changes in outcomes from the perspective of custodial parents and their households or from the broader perspective of society. Combining estimates from the cost analysis and the impact analysis suggested that was not the case. The



“You’ve got a parent and two or three kids and you take their parent’s SNAP away, you’re lowering the benefits they’re receiving. So even though you’re still giving the children SNAP benefits, you’re taking away from that household. So they don’t have as much just because they don’t want to go to child support for no telling what reason. Maybe they didn’t ever call the police and they’re scared of him or whatever the case may be, they don’t have proof for good cause, but we’re gonna make them do this to give them food stamps and I personally don’t think that it’s necessary. I think that they should not have the policy to do that, because the benefits should be there for that person too.”

—SNAP worker

cooperation requirement was associated with an annual monetary loss to custodial parents of \$792. This loss was mostly the result of reduced average SNAP benefits. These losses in benefits were not offset by increased child support payment receipt, as was the intention of the program. The reduction in SNAP benefits represented a gain from the perspective of government, but that gain was partially offset by increased enforcement costs associated with additional child support cases. Summing across perspectives, the cooperation requirement was associated with a \$93 loss per SNAP household subject to the requirement per year from the perspective of society. These findings suggested that neither custodial parents and their households nor society as a whole benefited from implementation of the cooperation requirement.⁴¹

The limitations to this analysis should be kept in mind when interpreting these findings. Estimates of the benefits of the program might reflect factors other than the cooperation requirement, given the use of a quasi-experimental study design. The cost estimates could be

⁴⁰ The Federal government reimburses 66 percent of State costs to process and maintain child support order.

⁴¹ The Federal Congressional Budget Office (CBO) prepared estimates of the cost of implementing the cooperation requirement as part of deliberations of the Farm Bill in 2018 (CBO 2018). Those estimates projected that implementation would lead to decreases SNAP benefit payments and increases in child support orders and their associated costs. These projections suggested that government savings from decreased SNAP benefits would be more than offset by increased government costs for establishing and enforcing child support orders. The overall projected effect of the requirement was an increase in costs to the government. This projection of government monetary loss from implementing the requirement differs from the estimated government monetary gain found in this study for Kansas. This difference emerges in part because the analysis revealed a relatively small increase in the number of child support orders in Kansas. In fact, this study assumed a higher government cost to establish and enforce child support orders than the CBO projection, among other differences. The CBO projections focused only on costs from the government perspective and did not include estimates of net benefits for custodial or noncustodial parents. More information is at: https://www.cbo.gov/system/files/2018-07/hr2_1.pdf. Accessed November 15, 2023.

subject to recall error— particularly, the start-up cost estimates, which were collected 7 years after the costs were incurred. The benefit estimates included only outcomes that could be measured and converted to dollar values. The cooperation requirement could have other effects not reflected in these valuations. For example, the estimates do not include changes to food security and any associated costs or benefits related to changes in household nutritional intake. Further, the increases in paternity establishments and child support orders could have favorable effects beyond those documented in the net benefit calculations for cases in which they translate into increased father involvement in children’s lives. Alternatively, they could have negative effects for cases in which they require custodial parents to re-establish contact with former partners with whom they or their children have unhealthy relationships.

Additionally, some benefit estimates that were included required adjustments based on information drawn from other studies that might not reflect SNAP households in Kansas subject to the cooperation requirement. For example, the valuation for increased child support enforcement activity was based on a different study and might not reflect the changes specific to the orders established as a result of the cooperation requirement. The study team estimated net benefits by using different assumptions to address these limitations to the extent possible. None of the alternate estimates contradicted the main takeaways from this analysis: the benefits implied by changes in outcomes (with the limitations associated with the analytic design of the impact analysis) do not suggest benefits for custodial parents nor do they offset the costs of implementing the cooperation requirement for society as a whole.

As noted earlier, cost outcomes in Kansas were largely determined by the State’s specific implementation of the cooperation requirement; understanding how these contextual factors shaped administrative costs is critical when interpreting findings. Kansas did not incur any system-related costs during initial implementation; therefore, start-up costs were minimal and likely much lower than would be expected in States that do not have an existing, well-developed, integrated data system. Kansas’ extensive use of private child support vendors—which accounted for 99 percent of the total administrative costs—also limit the generalizability of findings to other States that do not administer a private child support system. The timing of Kansas’ implementation of the policy is also important to consider, because the costs of implementation likely differ now compared to 2015.

Recognizing that these contextual factors might limit the applicability of Kansas’ cost estimates to other States considering implementing the policy, we supplemented the cost analysis with descriptive cost information collected during site visits. Findings from the implementation analysis provide insight into the cost experiences of other States interviewed for this study, including Arkansas, which implemented the requirement in 2021, and West Virginia, which planned to implement in January 2024.⁴²

⁴² At the time of publication, the integrated system's go-live date has been deferred, which in turn has deferred the implementation of the cooperation requirement.

A key part of the implementation planning process was to estimate and support the start-up costs of expanding the cooperation requirement to the SNAP caseload. Site visit findings indicated the majority of start-up costs were associated with data system enhancements to facilitate communication between SNAP and child support agencies. Other start-up costs were minimal and related to staff training, increased client communication and printing and mailing costs, and technical staff time. Although implementing the policy did require training costs and increased labor, most agencies did not hire new staff; additional work and changes related to the requirement were absorbed into the responsibilities of existing staff. Once the data systems were in place, ongoing costs to maintain the requirement were minimal, particularly for State SNAP agencies; child support agencies tended to take on larger ongoing costs due to the increase in referrals and the costs of opening and managing these cases.

Exhibit 3.18. Cost spotlight: Arkansas and West Virginia

- Arkansas paid a \$600,000 vendor fee for data system enhancements to implement the requirement.
- Other start-up costs in Arkansas summed to approximately \$1,500, which included about \$500 for technical staff to coordinate the transfer of data and reports across teams and \$1,000 for the same staff to conduct user acceptance testing of the reports. These estimates do not reflect State child support agency costs.
- At the time of the site visit, West Virginia staff estimated the costs for updating the system to be anywhere between \$100,000 and \$1 million, depending on the modifications needed and how the updated system would be rolled out.
- West Virginia anticipates some increased labor costs for training and client communication but does not anticipate hiring new staff because of the requirement. ▲

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Chapter 4 Summary of Study Findings

Leading up to and since the 2018 Farm Bill, there has been interest among some State and Federal policymakers to adopt a child support cooperation requirement in SNAP. Until now, very few studies have examined the potential implications of mandating a child support cooperation requirement for SNAP participants, which makes it difficult for policymakers to make evidence-informed decisions about these policies. This study collected data from multiple sources to provide a detailed picture of the cooperation requirement policies, the operational realities of these requirements for SNAP and child support programs, and the potential consequences of cooperation requirements for SNAP participants.

Proponents of expanding cooperation requirements to SNAP support these requirements as a way to increase the number of custodial parents who are connected to the child support program and the amount of child support collected on their behalf. Cooperation requirements are also viewed as a tool that can further the child support system's family support goals by increasing financial responsibility and accountability among noncustodial parents. In addition, there could be cost savings to SNAP if the amount of child support collected on behalf of custodial parents reduces the amount of SNAP benefits for which those parents are eligible.

Conversely, others voice concerns about the potential negative consequences associated with mandating cooperation with child support as a condition of SNAP eligibility. They note the limited ability of many noncustodial parents to pay child support at the level and frequency that would offset government benefits and express concerns that sanctions for noncooperation could jeopardize already precarious food security for these families. There is also concern that the cooperation requirement could destabilize informal agreements between parents. Others worry that the cooperation requirement could increase the risk of re-establishing unproductive or unsafe interactions with noncustodial parents.

This study collected empirical evidence to address the potential positive and negative outcomes from mandating the cooperation requirement in SNAP. These findings are highlighted in the remainder of this chapter, along with some lessons learned regarding implementation of the cooperation requirement.

4.1. Findings From the Snapshot of Cooperation Requirement Outcomes Analysis

This study used administrative data to provide a snapshot of the characteristics of SNAP households that are or would be subject to the cooperation requirement and outcomes related to the requirement. These outcomes included SNAP benefit amounts, number of child support orders, amount of child support received by families, and socioeconomic and demographic characteristics of groups potentially affected by the requirement, among others. The snapshot analysis was conducted separately for the five study States with the cooperation requirement at the time of data collection (Arkansas, Idaho, Kansas, Michigan, and Mississippi) and the three

study States that did not have the cooperation requirement (Ohio, Tennessee, and West Virginia).⁴³

Importantly, the outcome snapshot analysis is descriptive only. It cannot identify the extent to which the cooperation requirement affected establishment of child support orders or distribution of child support payments to these families.

Findings for States with the cooperation requirement included the following:

1. It was common for SNAP households to be subject to the requirement. All States included in this analysis applied the cooperation requirement to custodial parents. Between 20 percent and 30 percent of SNAP households across States were subject to the cooperation requirement.
2. Relatively few SNAP households were sanctioned for failure to comply. About 3 percent of SNAP households were sanctioned in two study States and less than 1 percent in the other two States.

Findings for States without the cooperation requirement included the following:

1. If these States were to implement a cooperation requirement that applied only to custodial parents, the percentage of SNAP households subject to the requirement would likely be similar to States with the cooperation requirement. Between 24 percent and 32 percent of SNAP households might be subject to it.
2. If these States were to implement a cooperation requirement that applied only to custodial parents, a substantial percentage of the SNAP households who would likely be subject to the cooperation requirement were not connected to child support yet. For example, in the State with the most complete information on connection to child support, 41 percent of these households were not connected to child support.

4.2. Findings From the Cooperation Requirement Effects Analysis for Kansas

The study team conducted a quasi-experimental analysis of how outcomes changed when Kansas implemented the cooperation requirement. The analysis used case-level data from SNAP and child support for the two years preceding and following the implementation of the cooperation requirement.⁴⁴ The analysis made use of a statistical approach that reduces the chance that the estimated effects reflect changes in outcomes related to factors other than the cooperation requirement, such as characteristics of the primary SNAP applicant, household-level characteristics, and economic context factors. Although this approach increased confidence that the estimates reflected the policy change, it is possible that some of the observed changes in outcomes were related to other concurrent policy or context changes that were not controlled for in the model. Findings should be interpreted cautiously for that reason. Appropriate

⁴³ Administrative data from West Virginia included in this analysis reflects a time period prior to implementation. See Chapter 2 for details on implementation in that State.

⁴⁴ Given limitations of administrative data provided by other study States, the study could not conduct quasi-experimental analyses to estimate associated effects of cooperation requirements in other States.

interpretation of these findings also requires keeping in mind the policy context in Kansas, which used privatized vendors for child support services and had an existing administrative data system that was well suited for sharing data across programs. The effects of the cooperation requirement might differ in the context of other States.

Findings from the effects analysis for Kansas included the following:

- **The SNAP cooperation requirement increased the number of families with child support cases.** The number of paternity establishments and child support orders increased by 15 percent and 5 percent, respectively, after Kansas implemented the cooperation requirement. This finding indicates that the cooperation requirement connected more people to child support services in Kansas. However, half of the increase in child support orders came from increases in orders with no payment amount—known as zero-dollar orders.
- **The cooperation requirement had no meaningful effect on the amount of child support payments received by families.** Despite increasing paternity establishments and child support orders, there was no effect on the amount of child support provided to families. This finding suggests that the cooperation requirement did not increase families' near-term financial well-being in Kansas.
- **The cooperation requirement led to a slight decline in overall SNAP benefit amounts for these families.** Following implementation of the cooperation requirement, SNAP benefit amounts decreased by an average of \$65 per month, indicating that some households did not comply with the requirement and subsequently lost a portion of their benefits.
- **A cost-benefit analysis found no benefit of the cooperation requirement to the families served by the SNAP and child support programs or when summing net benefits from the perspectives of custodial parents, noncustodial parents, and the government.** The study team collected cost data in Kansas over a 6-month period and estimates of costs in the first month of implementation. Given the costs related to initial and ongoing implementation, the lack of increase in received child support, and the loss of SNAP benefits, the study found no benefit of the cooperation requirement to families or society—as represented by the sum across custodial parents, noncustodial parents, and the government.

4.3. Findings From Staff Interviews Across Study States

Site visit interviews with State and local staff from the SNAP and child support programs provided insights into the implementation experience in study States with the cooperation requirement. Interviews in study States that do not require cooperation also provided context for understanding potential implementation barriers and facilitators.

Analysis of the staff interviews found the following:

- **Aligning processes and procedures of cooperation requirements across assistance programs minimizes burden on SNAP staff.** Overall, SNAP staff described little impact on their day-to-day operations of expanding cooperation requirements to SNAP participants, which was largely due to the alignment of referral procedures with TANF cooperation

requirements. This was particularly true in States where SNAP workers could also be responsible for determining eligibility for other assistance programs. When describing the extra responsibilities related to implementation, SNAP staff primarily noted the additional time it took to explain the new requirement to participants, collect additional personal information needed for the referral, and screen cases for good cause exemptions.

- **Expanding cooperation requirements to SNAP may increase the workload of child support staff.** Child support staff described a difficult process of verifying that SNAP referrals were appropriate for child support services and an increase in the number of cases that were hard to work. Child support staff described that many of the cases referred from SNAP were challenging to work because the noncustodial parents often had their own economic struggles and had limited ability to pay support. Staff also reported that many participants resented being required to cooperate and therefore were difficult to work with.
- **Automated, interfacing data systems are key to implementation but may require substantial upfront resources and are not a substitute for clear channels of communication between child support and SNAP.** Staff from both agencies described that having a data system that passed information between SNAP and the child support program automatically was critical to their ability to implement the requirement smoothly. Staff wished more information could be shared between programs, such as child support payment history. Staff from both agencies noted that implementation was most challenging when a data system needed to be updated to support implementation. Data system updates were costly and took a lot of time to implement. Staff from both agencies described frustration when they did not have direct lines of communication to staff in the other program. In particular, if SNAP and child support aren't housed within the same agency, it became even more important that staff had these lines of communication when the data systems did not share information as intended.
- **Identifying and responding to cases that may require a good cause exemption is challenging for SNAP and child support program staff.** Ensuring safe access to child support services is a critical component of child support policy. Only one large-scale study has examined domestic violence, paternity, and child support participation.⁴⁵ That study found 37 percent of a nationally representative sample of single-parent custodial parents with child support orders had reported experiencing domestic violence from the child's other parent.⁴⁶ Good cause exemptions are intended to circumvent interaction with noncustodial parents with domestic violence history. However, data from the U.S. Department of Health and Human Services, Office of Family Assistance show that most States report less than 1 percent of their TANF caseload receiving a good cause exemption.⁴⁷ Moreover, only 8 percent of custodial parents have a family violence indicator in the child support Federal Case Registry. In this

⁴⁵ More information is at: <https://www.acf.hhs.gov/css/policy-guidance/safe-access-child-support-services-scope-issue>.

⁴⁶ More information is at: <https://www.acf.hhs.gov/css/policy-guidance/safe-access-child-support-services-scope-issue>.

⁴⁷ More information is at: https://www.peerta.acf.hhs.gov/sites/default/files/public/uploaded_files/NCSLChldSprt%26DomViol-508.pdf.

study of cooperation requirements in SNAP, the study team found most States had less than 1 percent of child support cases with a good cause determination. Thus, good cause exemptions appear to be underutilized, given the incidence of domestic violence among this population.

- **This study found that SNAP and child support program staff find it difficult to communicate good cause exemptions to participants.** Across and within States, staff vary in their descriptions of the circumstances that qualify for good cause exemptions, the level of documentation needed to support such an exemption, and the frequency of good cause re-determination. SNAP staff also express discomfort in asking parents private questions that are necessary for making good cause determinations. Staff-to-staff variation in understanding of good cause policy may contribute to the low rates of good cause requests and determinations. Training and specialized strategies for SNAP workers could improve agencies' ability to obtain the necessary information and make clients feel more comfortable providing it.
- **Noncustodial parent cooperation requirements pose additional implementation challenges and can be confusing for staff implement.** Staff in the study States that made (or were planning to make) noncustodial parents subject to a cooperation requirement had difficulty explaining this policy, including how they would identify noncustodial parents subject to the cooperation requirement and the circumstances under which the requirement would apply. Few staff were able to recall any first-hand experiences with implementing the policy. Overall, the lack of specificity in the cooperation policy language as it applies to noncustodial parents, coupled with a lack of policy guidance and training, makes it difficult for staff to understand and consistently implement the policy.
- **Cooperation requirement policies that depend on noncustodial parents making full and consistent child support payments may further erode the economic well-being of noncustodial parents unable to meet their child support obligations.** Noncustodial parent cooperation requirements differ from those for custodial parents. For custodial parents—the most common population affected by this policy—cooperation entails providing information about the noncustodial parent that the child support agency can use to identify, locate, and pursue child support order and enforcement actions on behalf of the child. Whether or not child support is ultimately collected as a result of the information provided by the custodial parent has no bearing on the determination of cooperation. For noncustodial parents, cooperation depends on the noncustodial parent making child support payments. Though the study States allow for leniency in cases in which the noncustodial parent is making a good faith effort to comply with child support, this leniency is up to caseworker discretion. Program staff and participants in the study States with and without the noncustodial parent cooperation requirement noted that many noncustodial parents have limited ability to pay child support and expressed doubt that the requirement would lead to more child support payments. In cases in which noncustodial parents have the means to make child support payments but do not, it is possible that denying or reducing SNAP benefits for failure to pay child support could incentivize cooperation and result in more child support payments. However, in cases in which noncustodial parents do not have the means to pay child support, denying or reducing SNAP benefits for failure to cooperate will likely further erode the

noncustodial parent's economic well-being, and is unlikely to result in additional child support payments.

4.4. Findings From Participant Interviews Across Study States

In-depth interviews with SNAP participants provided insights into how families experience the cooperation requirement, how the requirement impacts or might impact their perspectives of the child support program, and how the requirement may or may not affect decisions to participate in SNAP.

Analysis of the participant in-depth interviews found the following:

- **The cooperation requirement—including, why cooperation is required, what constitutes cooperation, and the implications for those who do or do not cooperate—is confusing to participants.** Although some participants have experience with cooperation requirements from other assistance programs, most participants first learned about the requirement during their application process with SNAP. Some participants expressed confusion about what they had to do to cooperate. Other participants described that when they had received a notice they were to be sanctioned, they were confused because they thought they had shared the necessary information with child support.
- **Some participants were in favor of the cooperation requirement.** Some participants appreciated receiving help from the child support agency to open a case, acknowledging that they would not have done so on their own accord.
- **Other participants were highly critical of the cooperation requirement.** Some participants noted the limited ability of noncustodial parents to pay support and worried that involving the noncustodial parent in the formal child support system could reduce the informal support that these parents provide to their children. Some participants also expressed hesitation to cooperate because they feared doing so would anger the noncustodial parent and would put them at risk of physical harm; these participants did not trust either child support or SNAP to keep them safe. Often, when participants were concerned about the negative impact of cooperation on their well-being, they described choosing not to cooperate with child support and accepting the sanction as a result of their noncooperation.

4.5. Study Limitations and Concluding Considerations

Although this study was able to draw on a rich set of qualitative data provided by study States, the quantitative analysis was limited by the data States were able to provide. Only one State was able to provide data that supported analysis of how relevant outcomes changed after implementing the cooperation requirement. Evidence of the effects of the cooperation requirement from a broader set of States would provide greater confidence in conclusions about its efficacy, but other States were unable to share similar data for reasons related to availability of data, capacity to fulfill the data request, or willingness to share child support records for research purposes.

Conclusions about the effects of the requirement are also limited by the quasi-experimental research design—the observed changes in outcomes might reflect factors other than the requirement, such as concurrent policy changes that could have affected outcomes. If States decide to implement a cooperation requirement in the future, they should consider doing so in a manner that supports more rigorous estimates of the effects of the requirement. For example, a State could initially roll out the requirement to a randomly selected set of SNAP households, then compare the outcomes of those who were subject to the requirement at a given time to those who were not. Quantitative evidence on effects of the requirement from a broader set of States based on experimental research designs could better support evidence-informed assessments of the requirement.

Despite these limitations, findings from this study provide useful information about implementation of the cooperation requirement and descriptive quantitative evidence of the changes in participant outcomes that accompany implementation. Findings from the outcome effects analysis indicate that child support orders did increase after Kansas implemented the cooperation requirement, as intended by the policy. However, about half of this increase came in the form of zero-dollar orders, and there was no increase in the amount of child support that families received. These findings align with concerns raised in participant interviews across a broader range of States about the ability of many noncustodial parents to pay child support given their own financial constraints. The outcome effects analysis was not able to assess some other concerns raised in participant and staff interviews, such as decreased informal child support payments and increased risk of domestic violence.

Concerns about the effect of cooperation requirements on families' financial well-being are particularly salient given the challenges that States reported in implementing the cooperation requirement and the complex set of concerns and issues it raises for participants. The cost analysis for Kansas suggested relatively modest costs for initial implementation of the cooperation requirement. However, findings from the implementation study suggested that States often had substantial costs for developing the data infrastructure required to support the requirement. Moreover, States reported that without substantial investment in automated and integrated data systems, the burden of ongoing implementation of the requirement was also high, particularly for child support staff. Finally, States had difficulty implementing good cause exemptions, which could have had implications for supporting safe child support interactions.⁴⁸

Overall, findings from this study suggest that a range of policy and implementation conditions make it difficult to support a cost-efficient implementation of the cooperation requirement and challenging to improve family economic security through required cooperation with child support. Among the conditions that might promote successful and effective implementation would be a strong, existing data infrastructure that enables sharing data across systems; strong, existing relationships between SNAP and child support agencies; and evidence that a substantial number of noncustodial parents with no current child support involvement would have ability to

⁴⁸ More information is at: <https://www.acf.hhs.gov/css/policy-guidance/safe-access-child-support-services-scope-issue>

pay if child support orders were established. States considering implementation of the cooperation requirement should carefully assess the potential challenges and facilitators for implementing the requirement and what the effects for participants' economic well-being are likely to be.

References

- Action on households with special circumstances, 7 CFR pt. 273.11 (2019).
[https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-D/section-273.11#p-273.11\(e\)](https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-D/section-273.11#p-273.11(e))
- Agriculture Improvement Act of 2018, Pub. L. No. 115-334, 132 Stat. 4490 (2018).
<https://www.congress.gov/115/plaws/publ334/PLAW-115publ334.pdf>
- Child & Family Research Partnership (2015). *Child support unpacked: Examining the factors associated with order establishment and compliance in the Texas child support system*. LBJ School of Public Affairs.
https://www.fatherhood.gov/sites/default/files/resource_files/e000003713.pdf
- Congressional Budget Office, Cost Estimate (2018). *H.R. 2 Agriculture and Nutrition Act of 2018*.
https://www.cbo.gov/system/files/2018-07/hr2_1.pdf
- Cronquist, K. (2021). *Characteristics of Supplemental Nutrition Assistance Program households: Fiscal year 2019*. U.S. Department of Agriculture.
<https://www.fns.usda.gov/snap/characteristics-snap-households-fy-2019>
- Doar, R. (2016). *Reinvigorating child support as an anti-poverty program*. National Child Support Engagement Association. <https://www.ncsea.org/documents/Reinvigorating-Child-Support-Robert-Doar-April-2016.pdf>
- Doar, R., & Cancian, M. (2023). *Child Support Policy: Areas of Emerging Agreement and Ongoing Debate*. American Enterprise Institute. <https://www.aei.org/research-products/working-paper/child-support-policy-areas-of-emerging-agreement-and-ongoing-debate/>
- Gardiner, K. N., Tapogna, J., & Fishman, M. E. (2002). *Administrative and judicial processes for establishing child support orders: Final report* [Prepared for U.S. Department of Health and Human Services, Office of Child Support Enforcement]. MEF Associates.
<https://mefassociates.com/wordpress/wp-content/uploads/2015/07/Cost-of-Living-Adjustments-of-Child-Support-Orders.pdf>
- Grall, T. (2020). *Custodial mothers and fathers and their child support: 2017*. U.S. Census Bureau, U.S. Department of Commerce.
<https://www.census.gov/content/dam/Census/library/publications/2020/demo/p60-269.pdf>
- Hetling, A., Saunders, C., & Born, C. E. (2006). "Missing" domestic violence victims in welfare caseloads: The discrepancy between administrative and survey disclosure rates." *Journal of Health & Social Policy*, 22(2), 79–95. <https://pubmed.ncbi.nlm.nih.gov/17255073/>
- Llobrera, J. (2020). *Child support cooperation requirements in SNAP are unproven, costly, and put families at risk*. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/food-assistance/child-support-cooperation-requirements-in-snap-are-unproven-costly-and-put>
- Makey, R. (2023). *Supplemental Nutrition Assistance Program (SNAP) reauthorization and appropriations*. National Association of Counties.
<https://www.naco.org/resources/supplemental-nutrition-assistance-program-snap-reauthorization-and-appropriations#:~:text=The%20U.S.%20Department%20of%20Agriculture>

- Mississippi Department of Human Services (2020). *Child support manual*. <https://www.mdhs.ms.gov/wp-content/uploads/2020/02/Child-Support-Manual-Revised-2.20.pdf>
- Moore, Q., Magnuson, K. A., & Wu, A. Y. (2019). *Child support noncustodial parent employment demonstration (CSPED): Findings from the benefit-cost analysis*. Administration for Children and Families, Office of Child Support Enforcement. <https://www.acf.hhs.gov/css/grant-funding/csped-findings-benefit-cost-analysis>
- National Conference of State Legislatures (2023). *Child Support Pass-Through and Disregard Policies for Public Assistance Recipients*. <https://www.ncsl.org/human-services/child-support-pass-through-and-disregard-policies-for-public-assistance-recipients>
- Office of Child Support Services (2023). *FY 2022 Preliminary data report*. Office of Child Support Services, Administration for Children and Families, U.S. Department of Health and Human Services. <https://www.acf.hhs.gov/css/policy-guidance/fy-2022-preliminary-data-report-and-tables>
- Office of Child Support Services (n.d.). *Glossary of Common Child Support Terms*. Office of Child Support Services, Administration for Children and Families, U.S. Department of Health and Human Services. <https://www.acf.hhs.gov/css/glossary#G>
- Office of Child Support Services, OCSS AT-23-11 (2023). *Parentage establishment in the child support program: Comments*. Office of Child Support Services, Administration for Children and Families, U.S. Department of Health and Human Services. <https://www.acf.hhs.gov/css/policy-guidance/nprm-parentage-establishment-cs-program-comments-nov27>
- Office of Child Support Services, OCSS IM-08-03 (2008). *Guidance on Referral of Medicaid cases to Title IV-D Child Support Enforcement Agencies*. Office of Child Support Services, Administration for Children and Families, U.S. Department of Health and Human Services. <https://www.acf.hhs.gov/css/policy-guidance/guidance-referral-medicaid-cases-title-iv-d-child-support>
- Office of Child Support Services, OCSS IM-23-02 (2023). *Name Change to Office of Child Support Services*. Office of Child Support Services, Administration for Children and Families, U.S. Department of Health and Human Services. <https://www.acf.hhs.gov/css/policy-guidance/name-change-office-child-support-services-ocssNational>
- Personal Responsibility and Work Opportunity Act of 1996, Pub. L. No. 104-193, 110 Stat. 2105 (1996). <https://www.congress.gov/104/plaws/publ193/PLAW-104publ193.pdf>
- Postmus, J. L. (2004). "Battered and on welfare: The experiences of women with the family violence option." *Journal of Sociology and Social Welfare*, 13(2). <https://scholarworks.wmich.edu/jssw/vol31/iss2/7/>
- Roberts, P. (2003). *Rethinking the Medicaid child support cooperation requirement*. Center for Law and Social Policy. <https://www.clasp.org/sites/default/files/public/resources-and-publications/publication-1/0126.pdf>

References

- Sorensen, E. (2018). *Exploring trends in the percent of orders for zero dollar*. Administration for Children and Families, Office of Child Support Enforcement.
https://www.acf.hhs.gov/sites/default/files/documents/ocse/story_behind_the_numbers_cases_with_zero_dollar_orders.pdf
- Sorensen, E., Pashi, A., & Morales, M. (2018). *Characteristics of families served by the Child Support (IV-D) Program: 2016 U.S. Census survey results*. U.S. Department of Health and Human Services, Administration for Children and Families.
<https://www.acf.hhs.gov/archive/css/report/characteristics-families-served-child-support-iv-d-program-2016-census-survey>
- U.S. Department of Agriculture (2023). *State options report*. Supplemental Nutrition Assistance Program, Program Development Division, Food and Nutrition Service.
<https://www.fns.usda.gov/sites/default/files/resource-files/snap-15th-state-options-report-october23.pdf>
- U.S. Department of Agriculture Food and Nutrition Service (2024). National Data Bank. FY 2022 issuance and participation data retrieved on May 22, 2024.
<https://afnazre3ws08.usda.net/ndb8/Home/>

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Appendix A:

Study State Selection

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The Agriculture Improvement Act of 2018, commonly known as the Farm Bill, called for an assessment of (1) the implementation and impact of the child support cooperation requirement for SNAP in States that either formerly implemented or continued to implement the requirements and (2) the feasibility of implementing the requirements in other States (U.S. Congress, 2018). This study was originally designed to focus on a mix of States that included: States with a cooperation requirement in SNAP, States that had implemented this option in the past but no longer did so, and States that considered implementing the requirement.

A.1. Selecting Study States With a Cooperation Requirement in SNAP

At the time of the Farm Bill's passage in 2018, seven States had a child support cooperation requirement in SNAP. An additional State—Arkansas—approved the option to apply the requirement in 2019.⁴⁹ The study recruitment effort included outreach to all eight States with the requirement in place. Three States (Florida, Nebraska, and South Dakota) declined to participate in the study, resulting in a sample of five States with an active cooperation requirement: Arkansas, Kansas, Idaho, Michigan, and Mississippi. In Arkansas, the SNAP agency agreed to participate in the study, but the child support agency declined.

Maine was initially identified as a State with a cooperation requirement that was to be applied to noncustodial parents only. This policy was authorized through rulemaking and was in effect for less than five years, from 2017 to 2021, when it was repealed. During early communications with the Maine Department of Health and Human Services Office of Family Independence, the study team learned that the requirement had never been enforced in practice. A State legislative committee focused on equity and justice had recommended the elimination of the cooperation requirement and, ultimately, the requirement was removed. Because the cooperation requirement was in place only briefly and never enforced, Maine was not included in this study.

A.2. Selecting Study States Without a Cooperation Requirement in SNAP

The sampling plan for this study originally called for the inclusion of States that formerly implemented a cooperation requirement as well as States that were considering implementing a requirement. Three States were identified as having formerly implemented the cooperation requirement and three States were identified as considering exercising the option to implement the requirement in SNAP.

⁴⁹ Kentucky also implemented a temporary cooperation requirement that applied only to noncustodial parents between January 2019 and March 2020 and then reinstated the requirement in March 2021. The Kentucky Cabinet for Health and Family Services (CHFS) removed the cooperation requirement in SNAP in April of 2020 through an administrative regulation. The State legislature subsequently voted to make CHFS's decision to remove the ban null and void in March 2021.

To identify States that had formerly implemented the cooperation requirement, the study team reviewed all available FNS State Options Reports,⁵⁰ which contain information on which States are exercising the cooperation requirement option. From this review, the study team identified three States that appeared to have a cooperation requirement at one point in time that was later eliminated. Follow-up discussions with the SNAP and child support agency staff in these States clarified that none of the States ever had a cooperation requirement policy for SNAP in place or under consideration. This subsample was ultimately dropped due to the lack of States meeting the criteria of formerly implementing a cooperation requirement and, in the case of one State, because their cooperation policy had been dropped so long ago that the study data collection plans were not viable.

States where legislation to authorize a SNAP cooperation requirement was proposed between 2016 and 2021 were classified as States that had considered implementing the requirement. The study team identified States that met this criterion through a search of the National Conference of State Legislatures Child Support and Family Law Legislation Database. Based on this review and follow-up outreach, three States were selected for study participation:

- In Ohio, legislation requiring a cooperation requirement with SNAP was introduced but not passed. As of the publication of this report the legislation's status is still pending.
- In Tennessee, legislation was introduced and a fiscal note was created that provided estimated costs for implementing a requirement. Legislation did not move forward after the fiscal note was added.
- In West Virginia, cooperation requirement legislation was introduced but failed to receive enough votes to pass. Following the failed legislative bills, the West Virginia Department of Health and Human Resources secretary requested that the SNAP and child support programs implement the cooperation requirement through an administrative rule change. The integration of the child support and benefits eligibility systems was expected to be completed in spring/summer 2023. It was anticipated that the cooperation requirement would be implemented approximately six months after the completion of the integrated system in January 2024.⁵¹

To begin the recruitment process, FNS and the Office of Child Support Services leadership sent letters encouraging States to participate in the study. Once these initial letters were sent, the study team began communicating with State SNAP and child support agencies to secure their State's participation in the study and to establish data use agreements. Details about the recruitment process can be found in Appendix B.

⁵⁰ FNS periodically surveys State agencies administering SNAP about certain policy options to determine which options are in use. FNS compiles and publishes the results of these surveys in the State Options Reports. These reports are not a comprehensive reflection of all policy and administrative options available to States. The first State Options Report was published in April 2002. Subsequent reports were published in May 2003, October 2003, September 2004, August 2005, October 2006, November 2007, June 2009, June 2011, August 2012, April 2015, April 2016, August 2017, May 2018, and October 2023.

⁵¹ At the time of publication, the integrated system's go-live date has been deferred, which in turn has deferred the implementation of the cooperation requirement.

Appendix B:

Supplemental Information for the Qualitative Analysis

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This appendix presents the research questions and data sources for each of the study objectives addressed by the qualitative implementation study, followed by a description of the methods used to collect and analyze the data.

Exhibit B.1 lists the study objectives, research questions, and data sources for the study’s qualitative examination of child support enforcement cooperation requirements in SNAP. As shown in Exhibit B.1, the qualitative component of the study focused on how the cooperation requirement in SNAP was implemented in the study States, alignment with cooperation requirements for other assistance programs such as Temporary Assistance for Needy Families (TANF), and the experiences and perspectives of SNAP participants who were or could be subject to the cooperation requirement. To obtain information, the qualitative study component relied on documents from the study States, qualitative semi-structured interviews with SNAP and child support staff, and qualitative in-depth interviews with SNAP participants.

Exhibit B.1. Qualitative implementation study objectives, research questions, and data sources

Study Objectives and Research Questions	Data Sources						
	Document Review	State Director	State Policy Staff	State Data Systems Staff	Local Office Director	Frontline Staff	In-Depth Interviews
1a. What is the step-by-step administrative process used to implement the requirement? What major changes have been made to the administrative process in the last five years?	✓	✓	✓	✓	✓	✓	
1b. What system changes were necessary to coordinate SNAP and child support enforcement?		✓	✓	✓			
1c. Which agencies, organizations, or vendors help implement the requirement?		✓	✓	✓	✓	✓	
1d. What are (and were) facilitators to implementing the requirement effectively and efficiently?		✓	✓	✓	✓	✓	
1e. What specific requirements do States have? Are they enforcing all of them? If not, why?	✓	✓	✓	✓	✓	✓	
1f. What procedures do States use to determine cooperation?	✓		✓	✓	✓	✓	
1g. What procedures do States use to sanction participants for failure to cooperate?	✓		✓	✓	✓	✓	
1h. What procedures do States use to determine good cause for noncooperation?	✓	✓	✓	✓	✓	✓	
1i. What additional resources (for example, State and local staff time, printing costs for new forms, technical resources) were associated with developing and/or administering the systems necessary to coordinate SNAP and child support enforcement implementation of the child support cooperation requirement?		✓	✓	✓	✓		

Study Objectives and Research Questions	Data Sources						
	Document Review	State Director	State Policy Staff	State Data Systems Staff	Local Office Director	Frontline Staff	In-Depth Interviews
4a. How does the requirement align with Temporary Assistance for Needy Families (TANF) requirements?	✓	✓	✓				
4b. How does the requirement align with Medicaid requirements?	✓	✓	✓				
4c. How does the requirement align with programs carried out under Child Care Development Block Grants?	✓	✓	✓				
6a. What is the impact on individuals subject to the requirement and other household members, including children?							✓
6b. What is the impact on households with nontraditional family structures, including a household in which a grandparent is the primary caretaker of a grandchild?							✓
6c. Is there an impact on the relationship between the child and noncustodial parent?							✓
6d. What do participants understand about the requirement? How well do they understand it?							✓
6e. How do participants think that the requirement could be improved?							✓
6f. How do States assist applicants and participants in understanding the process and impacts of the requirement?	✓		✓		✓	✓	✓
6g. How does participants' understanding of the requirement affect how they think about accessing food assistance?							✓
6h. How has the cooperation requirement affected participants' relationship with the other parent?							✓

The key qualitative data components of the study included (1) site visits to State and local SNAP and child support offices, and (2) in-depth interviews with SNAP participants. The methods used to conduct these research study activities are described next.

B.1. Recruitment

This section describes how States, localities, and staff were recruited for site visits and how SNAP clients were recruited for in-depth interviews.

Site Visit Recruitment

Once each State’s SNAP and child support agency agreed to participate in the study, the study team worked with each State agency to identify the appropriate State-level staff to participate in interviews that would provide comprehensive information about the SNAP cooperation

requirement in that State.⁵² This process involved multiple telephone calls and emails with the State agencies to confirm staff availability and finalize a schedule for the interviews.

In the five study States with the child support requirement, the State agencies recommended two local SNAP and child support offices to include in the site visits. The study team asked State agencies to select a locality with a more urban population and a locality with a rural population, with one locality being close to the State capital. Exhibit B.2 shows the number and locations of completed interviews with staff and participants. Site visits in States considering a cooperation requirement included only State-level staff. The types of respondents interviewed during the site visits are described in section B.

Exhibit B.2. Number and location of SNAP and child support staff and participant interviews

Location	Number of Site Visit Interviews Completed	Number of SNAP Participant In-Depth Interviews Completed
States currently implementing a cooperation requirement		
Arkansas		
State-level staff interviews	4	n.a.
Pulaski County	2	25
Conway County	4	0
Idaho		
State-level staff interviews	8	n.a.
Boise	n.a.	25
Kansas^a		
State-level staff interviews	13	n.a.
Shawnee County	4	25
Miami County	4	0
Michigan		
State-level staff interviews	4	n.a.
Oakland County	4	n.a.
Monroe County	3	n.a.
Wayne County	n.a.	25
Mississippi^a		
State-level staff interviews	7	n.a.
Neshoba County	7	n.a.
Washington County	8	25
States considering implementing a cooperation requirement		
Ohio^b		
State-level staff interviews	9	n.a.
Fairfield County	n.a.	1
Licking County	n.a.	24
Tennessee		
State-level staff interviews	8	n.a.
Davidson County	n.a.	27

⁵² As noted in Appendix A, the Arkansas child support agency ultimately declined to participate in the study.

Location	Number of Site Visit Interviews Completed	Number of SNAP Participant In-Depth Interviews Completed
West Virginia		
State-level staff interviews	6	n.a.
Kanawha County	n.a.	25

Sources: Number of interviews completed are based on site visit records and SNAP participant interview records. SNAP and child support caseload data was obtained from State SNAP and child support agencies.

^a Because child support program administration in Kansas and Mississippi is not geographically based, all child support interviews for these States, including interviews with caseworkers and program managers, were counted as State-level interviews.

^b In-person in-depth interviews were conducted at the local SNAP office that serves Licking County. Virtual interviews were conducted with Ohio respondents located in Licking County and Fairfield County.

n.a. = not applicable.

Eligibility and Recruitment for SNAP Participant In-depth Interviews

The study design set a target interview completion goal of 25 in-depth interviews with SNAP participants in each study State.

Identifying Interview Locations

For each State, the study team asked the State SNAP director to recommend locations for conducting interviews with SNAP participants. Where feasible, the participant interviews were conducted in an area that had been included in the site visit data collection. Suitable locations were two hours or less from the State capitol or a major airport and had a sufficiently large population to yield the required number of completed interviews among eligible SNAP participants.

The study team reviewed the recommendations provided by the State SNAP agency and generated a list of zip codes associated with the locality selected for the participant interviews. The study team submitted this list to the State SNAP agency and requested names, contact information, and demographic information for SNAP participants located within the zip codes. Respondents were located in the areas shown in Exhibit B.2.

State SNAP agencies in the five study States with a cooperation requirement were also asked to provide information that could be used to identify households subject to the cooperation requirement. State SNAP agencies in the three study States that did not have an active cooperation requirement were asked to provide information about child support involvement for each household. The study team used this information as a proxy for SNAP participants who could potentially become subject to a cooperation requirement should one be implemented. Interviewers also used this information to tailor interview questions about participants’ opinions about a cooperation requirement for SNAP.

Eligibility Screening and Recruitment

A team of experienced recruiters received thorough training on the recruitment effort for this study. The recruiters then conducted telephone outreach to the SNAP participants using a script approved by the Office of Management and Budget (OMB) and the Health Media Lab Institutional Review Board (IRB). To assist with recruitment, respondents were informed that they

would receive \$50 gift card upon completion of the interview. During these telephone calls, recruiters completed additional screening to confirm that respondents were eligible to participate in the study. In the study States that had a cooperation requirement, SNAP participants were considered eligible for participation if they had experience with the child support cooperation requirement, including being granted a good cause exemption. During recruitment calls, recruiters also confirmed that the respondent was at least 18 years old and received SNAP.⁵³ A small number of respondents were screened in who did not meet the eligibility requirements. In some cases, interviews were not conducted with these respondents. If an interview took place, the interviews were not transcribed or used in the analysis.

In the study States that did not require cooperation, SNAP participants were considered eligible for participation in the in-depth interviews based on whether they would likely be affected by the cooperation requirement if implemented in their State. In Ohio and Tennessee, previously introduced legislation would have required custodial parents to cooperate with child support, so the recruitment script for these States included screening questions to determine whether the respondent was a custodial parent and at least one parent was absent from the household. At the time of interview recruitment in West Virginia, the State was planning to implement a cooperation requirement that applied only to noncustodial parents with child support arrears. Noncustodial parents would be required to cooperate with child support in order to receive SNAP benefits, so screening questions were designed to identify households with custodial parents and noncustodial parents.

As shown in Exhibit B.3, recruiters scheduled between 41 interviews (in Arkansas) and 83 interviews (in Tennessee) per State. To schedule these interviewers, recruiters placed between 954 telephone calls (in Kansas) and 3,405 calls (in Tennessee) per State, also shown in Exhibit B.3. The number of telephone calls placed by recruiters included calls placed to numbers that were not in service and calls where the telephone was not answered. If nobody answered the telephone, recruiters left a brief message about the study and asked the SNAP participant to return their call. This large number of recruitment calls and extensive overscheduling was necessary to schedule a sufficient number of interviews to reach the required 25 completed useable interviews per State. As these numbers suggest, the recruiters were challenged in recruiting and scheduling a sufficient number of respondents. Additionally, a large number of respondents did not complete their scheduled in-person interviews. Although the study team planned to conduct interviews with SNAP participants exclusively in-person, to complete the required number of interviews the study team obtained OMB and IRB approval to conduct some interviews virtually.⁵⁴ The study team completed as many in-person interviews as possible, then completed remaining interviews virtually using a secure videoconferencing platform.

⁵³ In a small number of cases, individuals identified through the SNAP administrative data were no longer receiving SNAP at the point of recruitment. These individuals were not screened out because they still could relate salient experiences and perceptions about the cooperation requirement.

⁵⁴ In November 2022 the study team worked with the study's FNS project officer to submit a non-substantive change request to OMB to allow the study team to complete some participant interviews virtually. The study team also obtained IRB approval to conduct the virtual interviews. As part of these requests, the study team submitted revised recruitment materials adapted for virtual interviews.

Exhibit B.3. SNAP participant in-depth interview recruitment, scheduling, and completed interviews by mode and State

State	Recruitment Calls	Interviews Scheduled	In-Person Interviews Completed	Virtual Interviews Completed	Total Interviews Completed
Arkansas	1,314	41	7	18	25
Idaho	1,541	47	15	10	25
Kansas	954	43	16	9	25
Michigan	1,494	44	13	12	25
Mississippi	1,675	55	21	4	25
Ohio	2,258	44	12	13	25
Tennessee ^a	3,405	83	3	24	27
West Virginia	1,679	48	4	21	25

Source: SNAP participant interview records.

^a The study team conducted additional interviews in Tennessee beyond the required target of 25 completed interviews because additional interviews were scheduled for the same day that the team reached the target of 25 completed interviews. The study team had a policy of not canceling on respondents the day of their interview.

Several possible reasons exist for the wide variation between States in the number of calls placed, number of scheduled interviews needed to achieve the required number of completed interviews, and the split between interviews completed in person and virtually. The three States that did not have a cooperation requirement—Ohio, Tennessee, and West Virginia—had the largest number of recruitment calls placed. Tennessee also had the largest number of scheduled interviews by a wide margin. It is possible that the lack of a SNAP cooperation requirement in these States meant that the opportunity to complete an interview for this study did not resonate with SNAP participants as strongly as it did for participants in States where a cooperation requirement was in place. Additionally, the study team might have become more effective with recruitment and scheduling as the study progressed. This could result in efficiencies—such as recruiters becoming more effective as they gained experience and requiring fewer telephone calls—for States with later data collection timing. Tennessee was the first State where the study team conducted participant interviews; the last participant interviews took place in Ohio and West Virginia. Finally, although participants in all States were offered \$50 if they completed an interview, an even larger incentive amount might have encouraged greater participation overall.

B.2. Data Collection

This section contains information about data collection for the site visits and participant interviews, including the types of respondents interviewed and the data collection process.

State and Local SNAP and Child Support Agency Staff Interviews

Site visits were conducted between June 2022 and January 2023. They included a mix of in-person and virtual interviews with 159 State and local-level SNAP and child support staff. Exhibit B.4 shows the breakdown in the number of interviews by State and program.

Exhibit B.4. Number of SNAP and child support staff interviewed by State and program

State	Number of Child Support Staff Interviewed	Number of SNAP Staff Interviewed	Total Staff Interviewed
Arkansas	0	19	19
Idaho	6	9	15
Kansas	16	19	35
Michigan	9	15	24
Mississippi	15	12	27
Ohio	6	9	15
Tennessee	7	8	15
West Virginia	4	5	9
Total	63	96	159

Note: The Michigan site visit also included an interview with a State-level advocacy group.

Site visits were conducted in person or virtually in each study State. The study team prioritized conducting interviews in person. However, if program staff worked remotely or there were scheduling conflicts that could not be resolved, the study team conducted virtual interviews using secure videoconferencing technology. Site visits in States that had a cooperation requirement lasted three days and site visits in States that did not have the requirement lasted the equivalent of one day.

In preparation for the site visits, the study team reviewed State policy documents that provided a foundational understanding of the cooperation requirement in States that currently implement them, proposed policies in States considering a requirement, and State-level alignment of policies across assistance programs. Examples of policy documents the study team reviewed include legislation and SNAP and child support policy manuals.

At the State level, interviews were held with child support and SNAP program directors, policy staff, and data system staff. At the local level, interviews were held with local child support and SNAP office directors, local policy experts, supervisors, caseworkers, and legal staff in two separate localities. In Michigan, the study team also interviewed staff from a State-level advocacy group. Interviews were conducted one-on-one or in small groups of staff with similar roles. Interviews were conducted separately for child support and SNAP staff.

Interviews were semi-structured and an interview guide was used to ensure interviews were conducted in a consistent and thorough manner. Interview topics for study States with a cooperation requirement included motivation for opting to implement the cooperation requirement, planning and early implementation experiences, implementation processes and procedures, and barriers and facilitators to implementation.

In the three study States that did not have a cooperation requirement, interview topics included motivation for considering a requirement and any early planning experiences or considerations. In Ohio and Tennessee, respondents were asked about potential barriers and facilitators to implementation if a cooperation requirement was implemented. In West Virginia, where preparations for implementing a cooperation requirement in 2024 were underway, interviewers

asked State-level child support and SNAP respondents about their experiences with updating policy manuals and making changes to the data system to facilitate implementation. West Virginia respondents were also asked about anticipated implementation barriers and facilitators.

SNAP Participant In-Depth Interviews

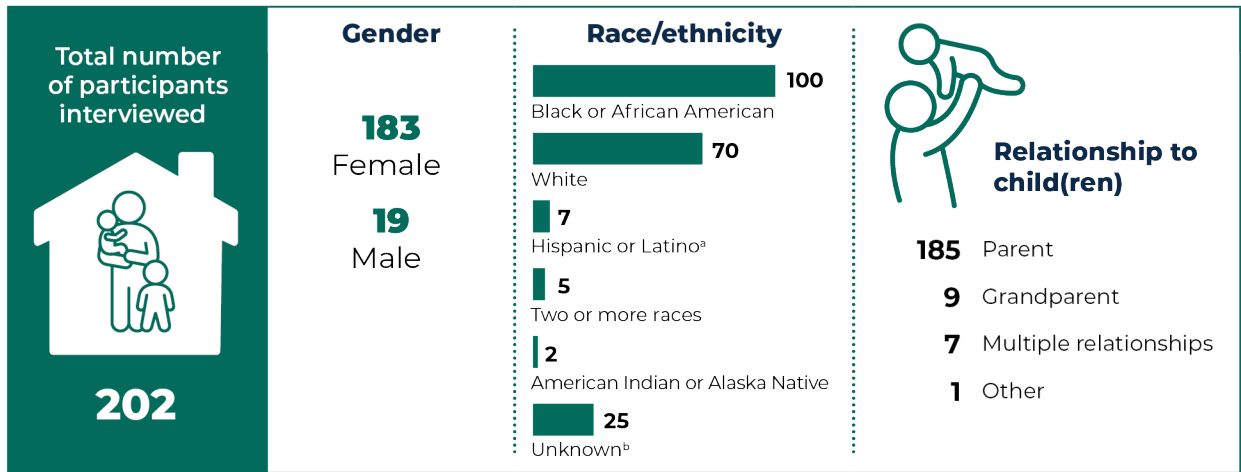
The participant in-depth interviews were conducted between February and August 2023. Interviews were semi-structured and conducted using an interview guide. Interview questions in study States with the requirement focused on SNAP participants' experiences with the cooperation requirement, the effect of the cooperation requirement on their relationship with their children and the other parent or parents of their children (or both parents if the respondent was not a parent), their economic circumstances, and their views on the cooperation requirement overall.

In study States that did not require cooperation, interview questions focused on SNAP participants' experiences with child support and SNAP, their financial circumstances and challenges, their perceptions and reactions to the concept of a cooperation requirement, how they would respond if they were subject to one, and what effect it might have. Respondents were provided with a \$50 gift card upon completion of the interview.

The study team conducted interviews with a total of 202 respondents across all eight States included in the study. As shown in Exhibit B.3, the study team completed 25 interviews in each State and 27 in Tennessee.

As shown in Exhibit B.5, 90 percent of the SNAP interview participants were female (183), and about 10 percent of participants (19) were male. Most participants identified themselves as the parent of the children in their household, but the study team also interviewed nine grandparents and seven individuals who reported having multiple relationships to the children under their care in the household. For example, one participant was a parent to one child and an aunt to another in their household.

Exhibit B.5. Number of SNAP participant interviews completed by respondent characteristic



Source: SNAP participant interviews and State administrative data.

^a Respondents who identified as Hispanic or Latino are also included in other race categories. Not all study States that provided race information were able to provide ethnicity information about participants, so this count only includes the ethnicity data provided by a subset of study States. The State profiles in Volume II provide additional details about respondent characteristics by State.

^b The West Virginia administrative data file provided for this study did not contain race or ethnicity information.

Analysis Methods

This section describes the methods used to analyze the qualitative data. The approach for analyzing site visit data is described first, followed by a description of the approach for analyzing SNAP participant interview data. All interviews were recorded, and then transcribed by a professional transcription company. Coding was completed using NVivo qualitative data analysis software.

Post-Site Visit Activities and Data Analysis

Upon completion of each site visit, the members of the study team who conducted the visit summarized basic facts about the site visit (such as the number and type of staff interviewed in each location) and the key topics discussed by using a standardized template that had been created in advance of the site visit data collection. For the study States that had a SNAP cooperation requirement, the study team developed process maps depicting how the requirement was operationalized. To develop the process maps, the study team primarily relied on interviews with frontline child support and SNAP staff but also drew on interview data from other site visit respondents, as well as program documentation. The study team synthesized the State-level process maps into a single process map, shown in Chapter 2.3. This process map reflects the child support cooperation process across study States with a SNAP cooperation requirement in place.

Once all interviews were completed and transcribed, the study team developed a coding scheme for the site visit interviews that aligned with the study’s objectives and key research questions. The study team completed a round of coding during which they grouped text based on the research question or topic it addressed. The study team then reviewed the coded data to identify themes and illustrative quotes within and across States and localities.

SNAP Participant Post-Interview Activities and Data Analysis

For each interview, interviewers completed brief post-interview notes using a standardized template. The template included space to record information about who conducted the interview, where and when it was conducted, demographic information about the respondent, summary information about the interview, and contextual information to assist in analyzing the interview.

Analysis of the in-depth participant interviews followed a process similar to the site visit data: once all interviews were completed and transcribed, the study team developed a coding scheme that aligned with the study's objectives and research questions. The study team completed a round of coding during which they grouped text based on the topic it addressed. The study team then reviewed the coded data to identify themes and illustrative quotes within and across States and localities. The post-interview notes were also coded.

B.3. Study Limitations

This section describes the primary limitations associated with the site visit and participant interview data.

Limitations to Site Visit Data

Findings from the site visits had two primary limitations. First, there was little to no staff recall of preparation and initiation of the cooperation requirement in Michigan and Mississippi, where the SNAP cooperation requirement had been in place since 1996. Most staff who were interviewed in these States were not in their positions during the planning phase for the requirement and could not reflect on initial motivation for adopting the cooperation requirement or describe the planning and early implementation. In all study States, when staff were new to their positions, they were not inclined to reflect on decisions made before their tenure. Additionally, because the Arkansas child support agency declined to participate in this study, the perspectives of staff from this agency were not included. Only the perspectives of staff from the Arkansas SNAP agency were captured in this study.

Limitations to SNAP Participant Interview Data

In implementing States where a SNAP cooperation requirement had been in place for many years, some interviews included SNAP participants who were first subject to the requirement several years ago. In select cases, the children in the respondent's household were adults and no longer living with the respondent at the time of the study interview. We asked these participants to reflect on their initial experiences with the cooperation requirement during a past time period when it was relevant to their situation, which meant some participants were recalling experiences that occurred many years ago. Such accounts could be subject to recall bias and also might not reflect the current approach to implementing the cooperation requirement in the State.

The intricacies of cooperation requirements were sometimes challenging to discuss in detail with SNAP participants because they did not always have a full understanding of the status of their SNAP or child support cases. Many respondents indicated that they had not received clear communication or adequate information throughout the cooperation process, while others simply did not understand the information they had received from the SNAP or child support agencies. This made it challenging to analyze which factors or policy components influenced their experiences.

Respondents in States without a current cooperation requirement were asked for their perspectives on a child support cooperation requirement for SNAP. This concept was difficult to explain to interview participants who had never experienced it themselves. They sometimes struggled to gain an accurate understanding of the concept of the SNAP cooperation requirement based on the information provided by interviewers, despite probing and reframing the questions. It was not always clear that participants understood the implications a cooperation requirement for SNAP would have on their situation or who would be subject to it if implemented.

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Appendix C:

Supplemental Information for the Quantitative Analysis

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This appendix provides additional information related to the analysis presented in Chapter 3, including findings from alternative specifications of the main analysis.

C.1. Outcome Snapshot Analysis

The outcome snapshot analysis addressed research questions that pertained to describing populations affected by the cooperation requirement in States that had it or that would be affected by it in States that did not have it (Exhibit C.1).

Exhibit C.1. Research questions related to the cooperation requirement outcome snapshot analysis

Research Question	
States Without the Cooperation Requirement (Ohio, Tennessee, and West Virginia)	
2e.	What proportion of SNAP participants would be subject to the cooperation requirement if the State chose to adopt the policy?
2e.i.	What proportion of individuals that would be subject to the cooperation requirement are already in the child support program?
2e.ii.	Among parents in the child support program, how many have: <ol style="list-style-type: none"> 1. paternity established for all of their children? 2. child support order(s) for all of their children?
2e.iii.	Among parents in the child support program, how much: <ol style="list-style-type: none"> 1. child support has been collected? 2. child support arrears are owed?
2f.	What proportion of SNAP participants that would be subject to the cooperation requirement if the State chose to adopt the policy currently participate in TANF? Among those that currently participate in TANF, how many have been sanctioned for noncooperation with child support?
States With the Cooperation Requirement (Arkansas, Idaho, Kansas, Michigan, and Mississippi)	
3a.	What proportion of SNAP participants are subject to the cooperation requirement?
3b.	At the time of application, what proportion of individuals are subject to the cooperation requirement?
3c.	What proportion of SNAP participants subject to the cooperation requirement at the time of application: <ol style="list-style-type: none"> 1. Met the requirement? 2. Failed to meet the requirement? 3. Received a good- cause exemption?
3e.	What proportion of individuals subject to the cooperation requirement were also subject to the cooperation requirement through TANF?
3f.	Among those who were also subject to the cooperation requirement through TANF, what proportion were sanctioned or disqualified?

Chapter 3 provided information about the data collection and methodological approach for the outcome snapshot analysis. The presentation of findings in Chapter 3 focused on those that most clearly synthesized patterns across States. This section of the appendix includes additional snapshot findings in Exhibits C.2 to C.7, including tabular versions of information presented in graphical form in the main text.

Exhibit C.2. Percentage of SNAP households subject to cooperation requirement in States with the child support cooperation requirement

Household Type	Arkansas	Idaho	Kansas	Michigan	Mississippi
SNAP households subject to requirement	29.2	20.7	30.4	20.0	23.2
Single-parent SNAP households with children subject to requirement	--	79.4	95.4	98.8	98.7
SNAP households	147,146	58,502	107,786	714,225	193,436

Source: State SNAP and child support administrative data.

Note: SNAP households were defined as subject to the cooperation requirement if they were identified as cooperating, under sanction, or had a good cause exemption.

-- Data were unavailable in State administrative data.

Exhibit C.3. Average child support case characteristics of custodial parent SNAP households who were already connected to child support in States with the child support cooperation requirement (percentage unless noted otherwise)

Child Support Characteristics of Custodial Parent SNAP Households	Idaho	Kansas	Michigan	Mississippi
Child support cooperation status				
Cooperating ^a	90.4	97.0	98.8	99.5
Noncooperating	3.1	2.8	0.3	0.5
Had a good cause exemption	6.5 ^b	0.3	0.9	0.0
Number of custodial parents connected to child support	9,618	30,372	141,415	44,302

Source: State SNAP and child support administrative data.

Note: Because these data reflect a single point in time, it is possible that some noncooperating participants may subsequently begin cooperating in later months. For participants who applied for SNAP in a given month, a noncooperation status may reflect an existing TANF sanction as opposed to a SNAP sanction.

^a States varied in how they recorded compliance with the cooperation requirement. The cooperating status in this exhibit includes all SNAP households who were not recorded as non-cooperating and did not receive good cause exemptions. The status includes those who were in compliance with requests from the child support agency, as well as those who did not receive requests from the child support agency because they already had child support orders in place, the noncustodial parent was incarcerated or deceased, or other reasons.

^b Idaho does not require clients to provide documentation to support good cause claims.

Exhibit C.4. TANF participation characteristics of SNAP households subject to cooperation requirement in States with the child support cooperation requirement

TANF Characteristics	Michigan	Mississippi
Single-parent SNAP households with children subject to cooperation requirement that participate in TANF	7.6	1.2
Among custodial parent SNAP households subject to cooperation requirement that participate in TANF:		
Percentage with TANF sanction for noncooperation with child support	1.7	n.a.
Percentage with TANF sanction for noncooperation for any reason	n.a.	0.4
Number of custodial parent SNAP households subject to cooperation requirement	141,415	44,302

Source: State SNAP and child support administrative data.

Note: TANF data were unavailable for Idaho and Kansas. SNAP households were defined as subject to the cooperation requirement if they were identified as cooperating, under sanction, or had a good cause exemption.

n.a. = not applicable.

Exhibit C.5. TANF participation characteristics of single-parent SNAP households with children that might be subject to cooperation requirement in States without the child support cooperation requirement

TANF Participation Characteristic	Ohio	Tennessee	West Virginia
Single-parent SNAP households with children that participate in TANF	10.2	6.3	7.6
Among single-parent SNAP households with children that participate in TANF:			
Percentage with sanction for noncooperation with child support	10.6	1.1	0.1
Number of single-parent SNAP households with children	212,150	134,682	41,083

Source: State SNAP administrative data.

Exhibit C.6. Average child support case characteristics of single-parent SNAP households with children that are already connected to child support in Ohio, a State without the child support cooperation requirement (percentage unless noted otherwise)

Child Support Case Characteristic	Ohio
Among heads of single-parent SNAP households with children connected to child support	
Have paternity established for at least one child	92.5
Have paternity established for all children	77.6
Have child support orders established for at least one child	94.2
Have child support order established for all children	65.0
Among participants with children who have at least one child support order	
Have at least one order of \$0	48.0
Average number of orders established	2.0
Child support order amount, total across household child support orders (\$)	338
Child support payments distributed to household, total across household child support orders (\$)	--
Arrears owed, total across household child support orders (\$)	
Family-owed arrears	8,880
State-owed arrears	2,169
Number of single-parent SNAP households with children connected to child support	125,583

Source: State SNAP and child support administrative data.

Note: Calculations in Ohio were restricted to SNAP households that could be linked to child support data. The percentage of sample members with child support orders established for at least on child exceeds the percentage with paternity established for at least one child. This finding could result from inconsistency in recording paternity establishment for cases with a presumption of paternity (such as children born to married parents) or from other data inconsistencies.

-- Data were unavailable in State administrative data.

Exhibit C.7. Average child support case characteristics of adults-only SNAP households already connected to child support in Ohio, without the child support cooperation requirement (percentage unless noted otherwise)

Child Support Case Characteristic	Ohio
Among heads of adults-only SNAP households connected to child support^a	
Have paternity established for at least one child	90.4
Average number of orders established ^a	2.0
Have at least one order owing \$0	78.8
Child support order amount, total across household child support orders (\$) ^b	226
Child support payments distributed to household, total across household child support orders (\$)	96
Arrears owed, total across household child support orders (\$)	
Family-owed arrears	13,072
State-owed arrears	3,338
Number of adults-only SNAP households connected to child support	61,450

Source: State SNAP and child support administrative data.

Note: Calculations were restricted to SNAP households that could be linked to child support data.

^a Includes all participants who have at least one child support order.

^b Excludes \$0 orders.

C.2. Outcome Effects Analysis

The outcome effects analysis addressed research questions related to the impact of the cooperation requirement (Exhibit C.8). As described in Chapter 3, the study team conducted the interrupted time series analysis for Kansas by using linked case-level SNAP and child support data to construct a month-level data set for the 2 years preceding and following the implementation of the cooperation requirement (July 2013 to July 2017). These data were linked using a State-provided unique identifier for individuals and cases.

Exhibit C.8. Research questions related to the cooperation requirement outcome snapshot analysis

Research Question
3f. What is the impact of the cooperation requirement on new and existing child support orders? How did the change in cooperation requirement policy affect the number of child support orders for custodial parents and noncustodial parents receiving SNAP?
3g. What is the impact of the cooperation requirement on the establishment of paternity? How did the change in cooperation requirement policy affect the number of paternity establishments for custodial parents and noncustodial parents receiving SNAP?
3h. What is the impact of the cooperation requirement on the child support payments to custodial households? How did the change in cooperation requirement policy affect average monthly payments on child support orders for custodial parents and noncustodial parents receiving SNAP?

Chapter 3 describes the main interrupted time series approach. To ensure that the findings were not sensitive to modeling choices, the study team estimated three sets of sensitivity analyses.

In the first set of sensitivity analyses, the study team estimated a version of the model that did not control for case-level fixed effects and instead only controlled for specific case-level attributes (household size and sex and age of primary applicant) and unemployment rate. This was a simpler model and was more likely to exclude important factors that could bias the estimates. The main model was preferred because it accounted for more factors that could influence the change in the outcomes of interest. Consistent with this idea, notable differences were observed in the model that did not control for SNAP case-level fixed effects (Appendix Table C.9). For example, in the case of child support orders, the estimate more than doubled. In the case of State-owed arrears, the estimate reversed sign—suggesting an increase in State-owed arrears—but remained statistically significant.

In the second set of sensitivity analyses, the study team estimated a version of the model that used a sample that included individuals that had at least 2 months of data, to examine robustness to the sample composition. That is, the study team reduced the data requirement from needing 6 months of data in the pre-period and 6 months of data in the post-period, to just having 2 months of data in any of the periods (2 months of data in a single period or 1 month of data in each period). This sensitivity analysis allowed for capturing the changes in the outcomes for cases that were not receiving SNAP for an extended period, in addition to cases that had been receiving SNAP for at least 24 months. Under this specification, most of the results were similar to the main findings, except for family-owed arrears. Instead of a decrease in family-owed arrears that was not statistically significant, the results indicated an increase in family-owed arrears of \$78, which was statistically significant.

In the third set of sensitivity analyses, the study team examined whether the results were robust to restricting the sample to the subgroup of cases with values greater than zero for specific outcomes. For example, the main regression for child support payments included cases that had no payment. The study team conducted a subgroup estimate for cases that had at least some child support payment. Results from this analysis were qualitatively similar to the main model.

Exhibit C.9. Child support and SNAP outcomes among custodial parent SNAP households, before and after implementation of the cooperation requirement in Kansas

Outcome	Change in Outcome			
	Main Model	Alternative Specification 1 (no fixed effects)	Alternative Specification 2 (less time-restricted sample)	Alternative Specification 3 (require positive outcome values)
SNAP benefit amount (\$)	-65*	-61*	-45*	n.a.
Paternity establishments	0.15*	0.22*	0.18*	0.15*
Child support orders	0.04*	0.11*	0.05*	-0.01*
Child support orders with no payment amount	0.02*	0.02*	0.02*	n.a.
Total child support order amount across orders (\$)	0	10*	2*	-14*
Total distribution amount across orders (\$)	-1	3*	-2*	-11*
Family-owed arrears across orders (\$)	-31	370*	78*	-114*
State-owed arrears across orders (\$)	-116*	133*	-64*	-196*

Source: Kansas SNAP and child support administrative data.

Note: Models included case fixed effects that controlled for characteristics that did not change over time, unless otherwise specified. They also controlled for local unemployment rate. The analysis included all SNAP households with children with 6 months of outcome data before and after the policy change, unless otherwise specified.

* Statistically significant at the 5 percent level.

n.a. = not applicable.

C.3. Cost and Cost-Benefit Analyses

The cost and cost-benefit analyses addressed research questions related to the resources required to implement the cooperation requirement and the relationship of those resources to the monetized effects of the requirement (Exhibit C.10). This section of the appendix provides further details about this analysis.

Exhibit C.10. Research questions related to the cooperation requirement cost and cost-benefit analyses

Research Question
5a. What are the Federal, State, and local costs associated with implementing each of the child support requirements for personnel, technology upgrades, and other costs?
5b. What are the costs and benefits to households and individuals in cooperating with the requirements?
5c. What are the benefits net of costs to SNAP agencies, custodial parents, noncustodial parents, and their families, and society as a whole?

Additional Details on Cost-Benefit Framework and Calculations

The calculation of net benefits must focus on benefits that are expressed in dollar value so that they are directly comparable to program costs, which are also expressed in dollar values. Thus, a key step in conducting the cost-benefit analysis was developing a strategy for including changes in outcomes that could be measured in monetary terms. Some outcomes, such as SNAP benefit

amounts, were already denominated in dollars and could be used directly in the calculations. Other outcomes, such as increased child support orders, had to be converted to dollar values based on information available from other sources. A further consideration for comparing costs and benefits was ensuring that the reference period and units matched. As such, all costs and benefits were expressed per SNAP participant subject to the requirement per year. Exhibit C.11 describes how the study team monetized each outcome included in the analysis.

Another key consideration for the cost-benefit was assessing the implications of the effects of the cooperation requirement from different perspectives. For example, a decrease in SNAP benefit payments is a positive monetary change from the perspective of the government because government outlays decline. However, it is a negative monetary change from the perspective of the custodial parent because they receive less in SNAP benefits. Exhibit C.11 describes how the benefit-cost analysis incorporated effects for each perspective considered in the analysis.

Exhibit C.11. Calculations for monetizing changes in outcomes associated with implementing the cooperation requirement in Kansas

Benefit Type and Data Inputs	Procedure for Monetizing Outcome	Framework for Analyzing Benefit
<p>Increased child support enforcement activities Estimated impact on child support orders (administrative data) Average child support enforcement costs for one case for one year (Moore et al., 2019)</p>	<p>The study team multiplied the estimated change in child support orders (0.04) by the average child support enforcement costs for one case for one year (\$4,437), as drawn from Moore et al., 2019). This value includes administrative costs for court hearings and warrants and excludes direct labor costs from child support staff, which are included as implementation costs.</p>	<p>An increase in child support enforcement costs was negative from the perspective of government and society.</p>
<p>Changes in formal child support payment from noncustodial parent to custodial parent Estimated impact on child support payments distributed to custodial parents (administrative data)</p>	<p>The study team multiplied the estimated change in average monthly child support payments received by the custodial parent (\$1) by 12 to calculate the impact per SNAP participant subject to the cooperation requirement for one year.</p>	<p>A decrease in child support payments was negative from the perspective of custodial parents and positive from the perspective of noncustodial parents. The perspectives of custodial and noncustodial parents offset one another, making this change neutral from the perspective of society.</p>
<p>Reduced SNAP benefit payments Estimated impact on SNAP benefit amount (administrative data)</p>	<p>The study team multiplied the estimated reduction in average monthly SNAP benefit payments (\$65) by 12 to calculate the impact per SNAP participant subject to the cooperation requirement for one year.</p>	<p>Reduced SNAP payments were positive from the perspective of government and negative from the perspective of custodial parents. The perspectives of custodial and parents and government offset one another making this change neutral from the perspective of society.</p>
<p>Reduced program administrative cost associated with benefit payments</p>	<p>The study team multiplied the estimated reduction in annual SNAP benefit payments by a Congressional estimate of the administrative cost of providing SNAP benefits (7 percent).</p>	<p>Reduced administrative costs were a benefit to government and society.</p>

Calculations based on alternate assumptions

The study team estimated cost benefits under alternate assumptions to test the sensitivity of the main findings, described below.

Valuation of child support enforcement costs. The main net benefit estimate used business-as-usual child enforcement costs averaged over two years from a study of noncustodial fathers with substantial arrears (Moore et al., 2019). Use of this estimate implicitly assumed that enforcement costs per case would have been the same for new cases established through the Kansas cooperation requirement. It is possible that the estimate overstates these costs, given the number of child support orders with no payment requirement for the Kansas sample. Zero-dollar orders likely have lower enforcement costs than other orders. To test sensitivity of findings to this assumption, we estimated costs assuming no costs for child support enforcement for new orders. This specification likely understates true child support enforcement costs but provides a range of possible values. Under this assumption, the net benefit per participant per year from the government perspective is larger than in the main estimate (\$800 versus \$686; Exhibit C.12). The net benefit from society's perspective is a small positive value (\$20 versus -\$93) because the larger benefit for the government offsets the (unchanged) negative monetary effect from the perspective of custodial parents. Given that this assumption understates true child support enforcement costs, it overstates the benefit to government and the extent to which that benefit offsets the negative effect for custodial parents.

Vary discount rate. The net benefit estimates account for implementation start-up costs by using the annualized cash flow value of those costs. The annualized value is calculated based on spreading costs over 20 years. This calculation used a discount rate of 5 percent, meant to reflect interest rates and beliefs on long-term investments. A higher discount rate would lead to a higher annualized value of the start-up cost. The study team estimated net benefits assuming a discount rate of 10 percent. Reflecting the modest start-up costs of the program, net benefit estimates are not sensitive to this assumption (Exhibit C.12). The cost per SNAP household subject to the requirement per year increases by about 1 cent in response to this change in assumptions.

Project net benefits to all SNAP households subject to the requirement and for more years. The main net benefit estimate was calculated per household per year. It is possible to project these estimates to reflect estimated total net benefits across households using the product of the per household estimates and the number of SNAP households subject to the requirement in Kansas at the end of the analysis period. Further, the value of total net benefits for a 10-year period were calculated net present value of the flow of net benefits per year, assuming a discount rate of 5 percent and that the number of SNAP households and per household net benefits remained constant. Projections for the sum of total net benefits across perspectives suggested that the cooperation requirement cost society \$3.6 million in a given year and that the net present value of that loss over 10 years would be \$24.3 million (Exhibit C.12).

Exhibit C.12. Estimates of net benefits (in monetary terms) per SNAP case referred to child support, by perspective (dollars)

Specification	Total Benefits Net of Total Annualized Cost by Perspective			
	Government	Custodial Parent and Children	Noncustodial Parent	Society
Main estimate	686	-792	12	-93
Alternate specification				
No child enforcement costs	800	-792	12	20
Discount rate of 10 percent	686	-792	12	-93
Project net benefits to all SNAP households	26,451,616	-30,515,760	462,360	-3,601,784
Project net benefits to all SNAP households for 10 years	178,787,100	-206,256,749	3,125,102	-24,344,547

Note: All values adjusted for inflation and reflect prices as of July 2017.

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