



Evaluation of Child Support Enforcement Cooperation Requirements in SNAP

Final Report, Volume II – State Profiles

June 2024

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Contents

Chapter 1 Introduction	1
Chapter 2 State Profile: Arkansas	3
2.1. SNAP and Child Support Program Context	3
2.2. Cooperation Requirement Process in Arkansas	4
2.3. Cooperation Requirement: Motivation, Planning, and Early Implementation	5
2.4. Participant Views and Experiences with the Cooperation Requirement in Arkansas.....	9
Chapter 3 State Profile: Idaho.....	13
3.1. SNAP and Child Support Program Context	13
3.2. Cooperation Requirement Process in Idaho.....	14
3.3. Cooperation Requirement: Motivation, Planning, and Early Implementation.....	15
3.4. Participant Views and Experiences with the Cooperation Requirement in Idaho	19
Chapter 4 State Profile: Kansas.....	23
4.1. SNAP and Child Support Program Context	23
4.2. Cooperation Requirement Process in Kansas	24
4.3. Cooperation Requirement: Motivation, Planning, and Early Implementation	25
4.4. Participant Views and Experiences with the Cooperation Requirement in Kansas.....	28
Chapter 5 State Profile: Michigan.....	33
5.1. SNAP and Child Support Program Context	33
5.2. Cooperation Requirement Process in Michigan	34
5.3. Cooperation Requirement: Motivation, Planning, and Early Implementation.....	35
5.4. Participant Views and Experiences with the Cooperation Requirement in Michigan.....	37
Chapter 6 State Profile: Mississippi.....	41
6.1. SNAP and Child Support Program Context	41
6.2. Cooperation Requirement Process in Mississippi	42
6.3. Cooperation Requirement: Motivation, Planning, and Implementation.....	43
6.4. Participant Views and Experiences with the Cooperation Requirement in Mississippi.....	45
Chapter 7 State Profile: Ohio.....	51
7.1. SNAP and Child Support Program Context	51

7.2. Cooperation Requirement: Motivation, Planning, and Implementation Considerations 52

7.3. Participant Views on the Cooperation Requirement in Ohio 54

Chapter 8 State Profile: Tennessee 57

8.1. SNAP and Child Support Program Context 57

8.2. Cooperation Requirement: Motivation, Planning, and Implementation Considerations 58

8.3. Participant Views on the Cooperation Requirement in Tennessee 60

Chapter 9 State Profile: West Virginia 63

9.1. SNAP and Child Support Program Context 63

9.2. Planned Cooperation Requirement Process in West Virginia 64

9.3. Cooperation Requirement: Motivation, Planning, and Implementation Considerations 65

9.4. Participant Views on the Cooperation Requirement in West Virginia 67

References 71

Exhibits

1.1.	Child support cooperation requirement process flow	2
2.1.	Arkansas SNAP and Child Support: Administrative structure and caseload size	3
2.2.	Overview of child support cooperation requirement process in Arkansas.....	4
2.3.	Characteristics of Arkansas SNAP households subject to the cooperation requirement	6
2.4.	Characteristics of study in-depth interview participants in Arkansas	9
2.5.	Participant experiences with sanctions and knowledge of good cause	11
3.1.	Idaho SNAP and Child Support: Administrative structure and caseload size.....	13
3.2.	Overview of child support cooperation requirement process in Idaho	14
3.3.	Characteristics of Idaho SNAP households subject to the cooperation requirement.....	16
3.4.	Characteristics of in-depth interview participants in Idaho	19
3.5.	Participant experiences with sanctions and knowledge of good cause	21
4.1.	Kansas SNAP and Child Support: Administrative structure and caseload size.....	24
4.2.	Overview of child support cooperation requirement process in Kansas.....	24
4.3.	Characteristics of Kansas SNAP households subject to the cooperation requirement	26
4.4.	Characteristics of in-depth interview participants in Kansas.....	28
4.5.	Participant experiences with sanctions and knowledge of good cause	30
5.1.	Michigan SNAP and Child Support: Administrative structure and caseload size.....	33
5.2.	Overview of child support cooperation requirement process in Michigan.....	34
5.3.	Characteristics of Michigan SNAP households subject to the cooperation requirement	35
5.4.	Characteristics of in-depth interview participants in Michigan.....	37
5.5.	Participant experiences with sanctions and knowledge of good cause	39
6.1.	Mississippi SNAP and Child Support: Administrative structure and caseload size.....	41
6.2.	Overview of child support cooperation requirement process in Mississippi.....	42
6.3.	Characteristics of Mississippi SNAP households subject to the cooperation requirement	43
6.4.	Characteristics of in-depth interview participants in Mississippi.....	46
6.5.	Participant experiences with sanctions and knowledge of good cause	48
7.1.	Ohio SNAP and Child Support: Administrative structure and caseload size.....	51
7.2.	Characteristics of Ohio SNAP households that could be subject to the cooperation requirement	52

7.3. Characteristics of in-depth interview participants in Ohio 54

8.1. Tennessee SNAP and Child Support: Administrative structure and caseload size 57

8.2. Characteristics of Tennessee SNAP households that could be subject to the cooperation requirement 58

8.3. Characteristics of in-depth interview participants in Tennessee..... 60

9.1. West Virginia SNAP and Child Support: Administrative structure and caseload size 63

9.2. Overview of planned child support cooperation process in West Virginia 64

9.3. West Virginia SNAP households that could be subject to the cooperation requirement..... 66

9.4. Characteristics of in-depth interview participants in West Virginia..... 68

Chapter 1 Introduction

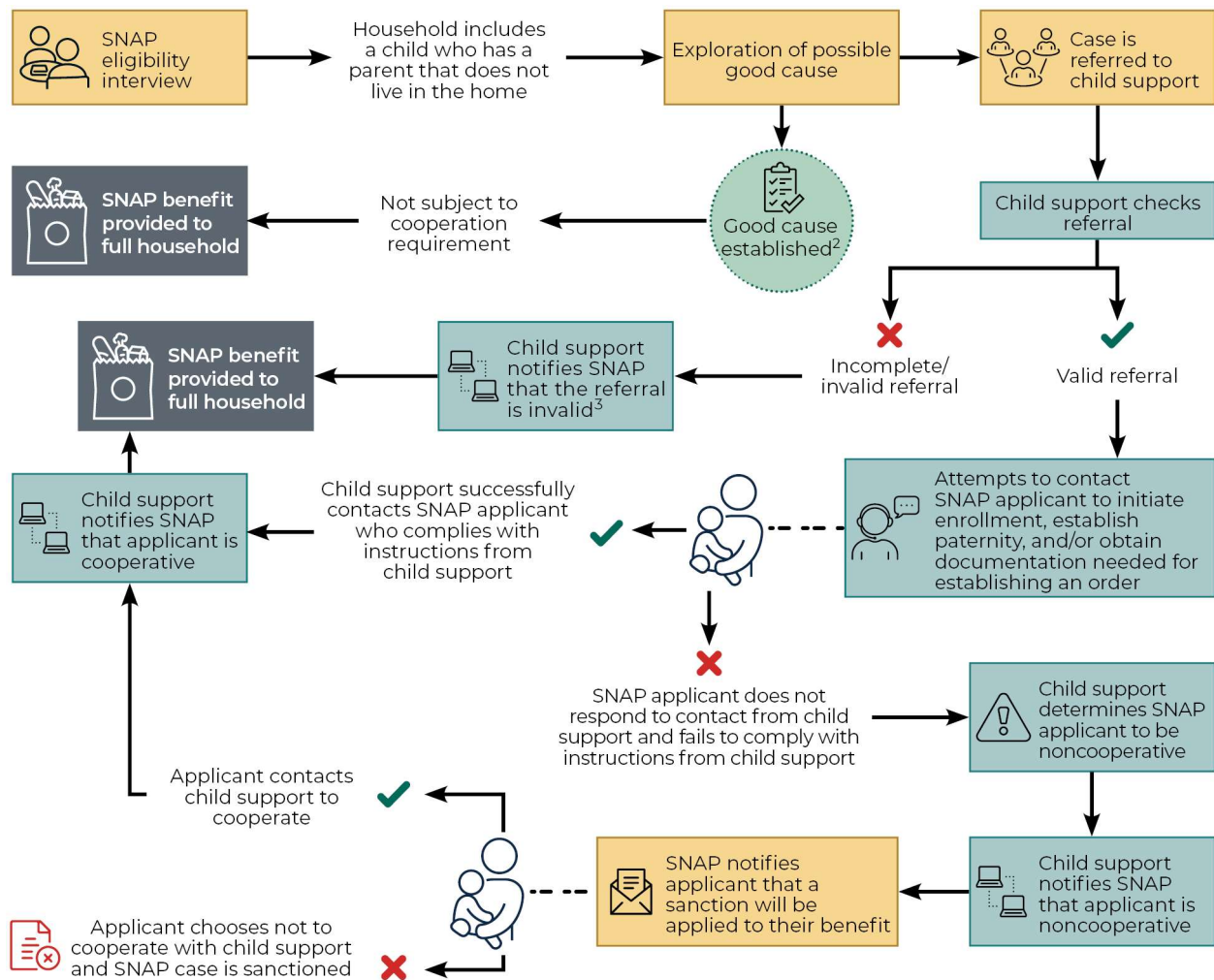
This volume presents profiles for each study State included in the study in alphabetical order: Arkansas, Idaho, Kansas, Michigan, Mississippi, Ohio, Tennessee, and West Virginia. The profiles summarize information collected (1) during site visits and virtual interviews with State and local Supplemental Nutrition Assistance Program (SNAP) and child support staff and (2) from in-depth interviews with SNAP participants. Each profile also includes selected highlights from the study's analyses of State child support and/or SNAP administrative data.

For study States that did not have a current cooperation requirement at the time of the study, the profile describes key considerations and concerns related to the potential implementation of this requirement from the perspective of staff and participants. For study States that were further along in their implementation at the time of the study, the profile includes a narrative description of implementation barriers and facilitators that are unique to the study State and a summary of the participant experiences with child support cooperation requirements in the State.

Exhibit 1.1 depicts the generalized process that applies to SNAP applicants whose household includes a child with a parent who lives outside the home.¹ In addition to Exhibit 1.1, the profiles for each of the five Study states with a current cooperation requirement for SNAP (Arkansas, Kansas, Idaho, Michigan, and Mississippi) include an overview of the child support cooperation process as implemented in those States. The West Virginia State profile includes an overview of the cooperation requirement process as planned.

¹ Based on data collected during site visits, the study team developed process maps for each of the five States that currently implement cooperation requirements and found that the process is similar across States.

Exhibit 1.1. 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 study 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 4 of the 5 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 4 of the 5 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.





Chapter 2 State Profile: Arkansas

Arkansas passed legislation to establish a child support cooperation requirement in SNAP in 2019 and began implementing the requirement in July 2021. To document and understand the State’s cooperation requirement implementation experience, the study team conducted 19 interviews with State and local SNAP leadership and frontline staff from two local area SNAP offices (Pulaski County and Conway County) in January 2023. The Arkansas child support agency declined to participate in the study; therefore, this profile includes information gathered during initial discussions with the child support agency but does not include data collected through site visit interviews with child support staff or child support administrative data. To document and understand the State’s cooperation requirement from the perspective of participants, the study team conducted 25 in-person and virtual interviews with SNAP participants from Pulaski County in January and February 2023.

2.1. SNAP and Child Support Program Context

In Arkansas, the child support cooperation requirement in SNAP is implemented by the State’s Department of Human Services (DHS) and Department of Finance and Administration (DFA). SNAP is administered by DHS Division of County Operation, which also administers Temporary Assistance for Needy Families (TANF), Medicaid, and the subsidized child care program, along with other assistance programs for families with low incomes. Child support is administered by DFA Office of Child Support. DFA also oversees a variety of other services to individuals, including tax services, motor vehicle services, and information about employment in Arkansas.

Exhibit 2.1. Arkansas SNAP and Child Support: Administrative structure and caseload size

 SNAP	SNAP agency	Department of Human Services, Division of County Operations, SNAP section
	SNAP administration	State administered
	Number of SNAP households in FY 2022	139,483 ^a
 Child support	Child support agency	Department of Finance and Administration, Office of Child Support
	Child support administration	State administered
	Number of open child support cases in FY 2022	154,126 ^b

^a U.S. Department of Agriculture (2023).

^b Office of Child Support Services (2023).










The SNAP program has offices located in each of the State’s 75 counties. SNAP cases are overseen by eligibility workers who are also responsible for determining eligibility for other public assistance programs. Individuals seeking assistance can apply online for services or walk into a local office. SNAP cases are centrally processed and are assigned to workers across the State. Centralized case processing is intended to increase efficiency and spread work more evenly among staff across the State.

The child support program has 26 local field offices. Individuals apply for child support services online or by walking into a local office. Arkansas uses a combination of administrative and judicial procedures for establishing and enforcing child support orders. Child support intake workers help families open a child support case and obtain all documentation necessary to establish a child support order. Child support intake workers then transfer the case to the establishment and enforcement team, which is made up of staff attorneys who file legal actions to establish paternity, obtain and modify child support orders from the court, and carry out enforcement actions if necessary.

2.2. Cooperation Requirement Process in Arkansas

The child support and SNAP programs must coordinate and share information in order to implement the cooperation requirement. Exhibit 2.2 summarizes the key steps involved in that process as described to the study team by staff.

Exhibit 2.2. Overview of child support cooperation requirement process in Arkansas

	Households with children headed by a custodial parent are subject to the child support cooperation requirement. ^a Initiation of the cooperation requirement process begins when a parent applies for or is recertified for SNAP benefits.
	SNAP workers explain the cooperation requirement to the individual and collect information about the other parent. The worker will also explain good cause exemptions.
	If all eligibility requirements are met, the SNAP case will be opened for the household while the individual responds to child support requests necessary to open and work their child support case. The individual has 10 days to be determined in cooperation before their SNAP household benefit is recalculated.
	The referral to child support occurs automatically via the integrated data system. Child support staff receive a notification of a new referral from SNAP.
	Once child support determines eligibility for child support services, a worker begins working with the household to open a child support case.
	Child support determines if an individual has cooperated with their efforts to establish a child support case.
	SNAP receives a notification through the data system that cooperation status has been updated.
	If the individual is cooperating, the household will receive their full SNAP benefit amount.
	If the individual is not cooperating, the individual receives a letter informing them that they have 10 days to cooperate or be sanctioned for noncooperation (that is, have their portion of the benefit removed and the benefit recalculated).

^a The Arkansas child support cooperation requirement legislation enacted in 2019 requires custodial and noncustodial parents to cooperate with the DFA Office of Child Support Enforcement as a condition of eligibility for SNAP. Based on interviews with SNAP staff, it was not clear whether and how the requirement for noncustodial parents was implemented in practice.

2.3. Cooperation Requirement: Motivation, Planning, and Early Implementation

Motivation

Arkansas enacted legislation requiring child support cooperation for SNAP participants in 2019. SNAP program leaders described that the motivation for adopting the cooperation requirement policy came from the State's executive branch, which was interested in promoting accountability and compliance in public assistance programs. State legislators in favor of adopting the cooperation requirement policy had support from the Governor for passage of this bill.

While the cooperation requirement bill (H.B. 1731) was under consideration, DFA provided a statement that detailed the estimated financial impact of the bill. The cost to DFA OCSE for necessary data system changes was estimated to be approximately \$1.45 million initially, with an additional \$200,000 to 250,000 per year thereafter in routine maintenance costs. The estimate did not include any implementation costs or costs for additional staff, although it was anticipated that the requirement could lead to an increase in the overall child support caseload, which would require additional staff.

State-level SNAP staff noted that Arkansas is one of the few States that require both custodial and noncustodial parents to cooperate with child support. However, interviews with local staff and participants revealed that this policy was not being actively implemented for noncustodial parents. Anticipating that implementing a cooperation requirement for noncustodial parents would be challenging, program leaders reportedly explained to lawmakers that the application of the requirement to noncustodial parents was generally not well understood and lacked good examples of its implementation from other States. In the end, legislators made both custodial and noncustodial parents subject to the cooperation requirement.

Planning and Rollout

The SNAP agency had primary responsibility for specifying the policy components that would dictate how the cooperation requirement policy would be implemented. State SNAP staff reported that it took approximately six months from policy writing to implementation. The child support agency was reportedly not very involved in this process.

A key step in preparing to implement the policy was planning for and making modifications to the data systems. Staff reported that the programs required data sharing agreements to support the sharing of information across the SNAP and child support systems. SNAP respondents described that making the updates to the data system was the most time-intensive part of the planning process. The programs also had to develop staff training about the cooperation requirement. SNAP staff reported that the training they received helped them understand what the cooperation requirement policy entailed and how to work with child support to implement the policy.

Before rolling out enforcement of the cooperation requirement, the public was informed about the policy change. SNAP staff described how policy changes must be given wide and general

publicity, such as through announcements published in newspapers. SNAP staff also recalled that letters were sent to households currently receiving SNAP and that the change was publicized on social media. A hotline was also set up to receive questions about the policy. Staff recalled getting some phone calls from participants, but not many.

The cooperation requirement was to be rolled out via a statewide pilot program from February 2020 through April 2020, before moving to full implementation. The pilot program would first apply cooperation requirements to new cases and then recertifications would follow. However, because of COVID-19, enforcement of the requirement was paused from April 2020 through July 2021.

Once rollout began in earnest, staff reported that many participants expressed confusion about the requirement or were upset about the requirement, despite the communication about the policy change. More generally, some frontline staff expressed that there was concern that the requirement could lead parents to claim they didn't know the identity of the other parent to avoid naming the parent.

Exhibit 2.3. Characteristics of Arkansas SNAP households subject to the cooperation requirement

SNAP administrative records provide some information about the implementation of a cooperation requirement, such as the percentage of SNAP households subject to the requirement and their cooperation status. Information about the time before implementation of the requirement was not available from Arkansas nor were child support administrative records. Although the available information documented patterns of outcomes after implementation of the requirement, they do not represent the causal effects of the requirement. This is because they are likely affected by a variety of policy, demographic, and economic circumstances other than the requirement.

- 29 percent of SNAP households were subject to the cooperation requirement.
- During the 17 months after implementation of the requirement, it was uncommon for single parent SNAP households with children in Arkansas to be sanctioned based on the cooperation requirement. The percentage of these SNAP households sanctioned based on the cooperation requirement was 0.3 percent in July 2021 and increased to 0.8 percent in November 2022.
- SNAP benefit amounts (not including Emergency Allotments) among single parent SNAP households with children increased from \$577 to \$621 from July 2021 through November 2022, adjusting for inflation.

For more information about findings from this analysis, see Main Report, Chapter 3. ▲

Implementation Facilitators

State and local SNAP staff described the factors that supported implementation of the cooperation requirement. Staff reported that the updated data system, clear policy and staff training, and effective communication practices with child support were all key to implementing the requirement.

Data System Features Enhance Implementation

- The Arkansas SNAP data system does not allow workers to bypass the screen where information about the noncustodial parent is collected. This feature is intended to ensure that complete information is shared with the child support program, which helps the child support staff to efficiently open child support cases.
- The Arkansas SNAP data system automatically updates the cooperation status as determined for TANF and Medicaid eligibility. If an individual is determined in noncooperation in either of those programs, the SNAP worker will see this status reflected in their system. This reduces the need for child support staff to work cases that have already been referred to child support due to participation in another assistance program.
- Arkansas SNAP staff can check order amounts and payment history for noncustodial parents applying for benefits without needing to contact child support. This feature enables SNAP staff to determine cooperation status for noncustodial parents quickly and limits the number of unnecessary referrals to child support.

Policy Clarity and Training Reduce Confusion Among Staff and Participants

- Staff felt that informing the public about the requirement well in advance of implementation was an important strategy for ensuring that families receiving SNAP, as well as future recipients, would not be surprised to learn about the requirement from SNAP staff.
- Staff described that having SNAP policy and procedures align closely with other cooperation requirements made it easier for them to understand and apply the policy.
- Staff described receiving sufficient training through a computer-based training module on the new policy. Staff also expressed that meetings with their supervisor supplemented the training they received and helped them understand the policy and implementation process more deeply.

Communication Practices With Child Support Ease Implementation

- SNAP staff reported that they generally receive timely notifications from child support about participants' cooperation status, which reduces the potential for families to be sanctioned for noncooperation due to processing delays.
- Local SNAP staff reported that having contacts in the child support program to call with questions helped support implementation.
- Because the policy was legislatively mandated, leaders from both agencies supported efforts to make implementation easier and ensure communication between them.

Implementation Barriers

Despite several implementation facilitators, staff also identified roadblocks that created implementation challenges.

Additional Improvements to Data System Could Improve Implementation

- Though there are helpful features of the data system that enhance implementation, some SNAP staff identified opportunities to improve the data system. For instance, SNAP staff described being unable to update the sanction status without notification from child support. For applicants who might have old sanctions on their case or for those who think they are cooperating with child support, SNAP staff are unable to query the child support data system for updates on cooperation status. They must wait for notification from child support before the status can be changed. Staff reported that it would be helpful if they could update that status themselves.

Staff Discretion for Good Cause Determination Leads to Uncertainty

- SNAP staff noted that the program lacks a strong, standard process for good cause determination. Staff described that good cause appears to be determined on a case-by-case basis, with lots of discretion across SNAP staff. SNAP staff also described a lack of options for making people exempt from the requirement and expressed a desire to have more options for scenarios that would allow individuals to be exempt from the cooperation requirement.

SNAP Participants Do Not Fully Understand the Reasons for the Cooperation Requirement

- Despite publicizing the policy change, SNAP staff reported that many participants do not understand why they have to cooperate with child support. SNAP staff also reported that they often observe hesitation on the part of participants to provide information about the noncustodial parent.

Task-Based Staffing Creates Challenges for Participants

- Although not specific to cooperation requirement processes, SNAP staff described that the task-based staffing approach to case processing meant that each time a participant communicates with SNAP, they could be working with a different caseworker. This can create opportunities for miscommunication and misunderstandings for participants and workers. For example, during the intake interview, participants are told about the cooperation requirement. If the participant returns to SNAP with a question about the requirement or an issue with child support, they could speak with another worker who may tell them something different.

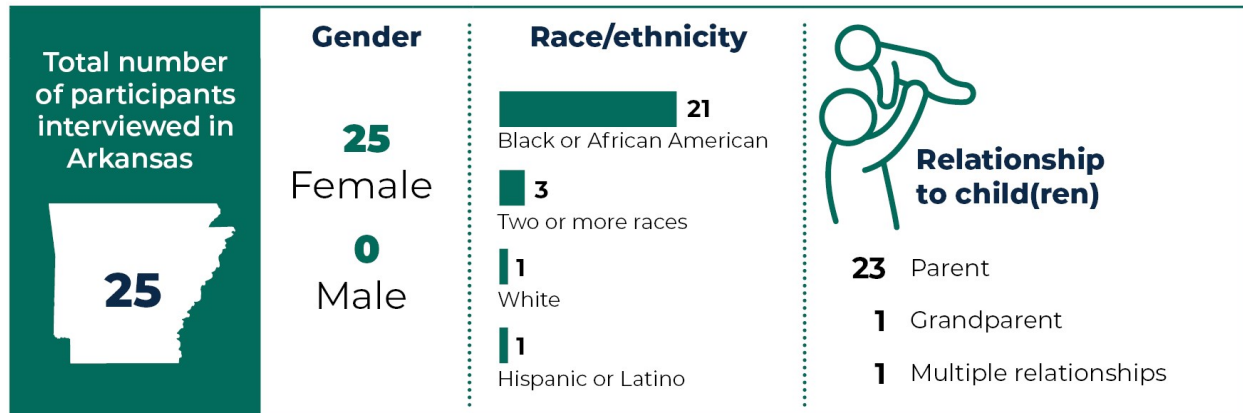
The Cooperation Requirement Creates Churn in SNAP

- Some SNAP staff felt that the cooperation requirement creates “churn” in SNAP, with more participants leaving and reentering SNAP within a shorter period of time than would otherwise be the case. The cooperation requirement adds another step in the eligibility process that may affect a household’s benefits and creates additional burden on both staff and participants.

2.4. Participant Views and Experiences with the Cooperation Requirement in Arkansas

Exhibit 2.4 provides an overview of the participants who were interviewed in Arkansas, including their gender, race and ethnicity, and reported relationship to the children in their household.

Exhibit 2.4. Characteristics of study in-depth interview participants in Arkansas



Note: Respondents who identified as Hispanic or Latino are also included in other race categories.

Participant Perceptions of the Cooperation Requirement

More than half of in-depth interview participants in Arkansas did not support the cooperation requirement, citing personal experiences in which the cooperation requirement did not work well for their family circumstances or confusion about the introduction of a new requirement to receive SNAP benefits. Some suggested that the cooperation requirement should be more flexibly implemented and applied on a case-by-case basis.

“I feel like they put a lot of pressure on women. You want the benefits, put your baby daddy on child support, which is good because a lot of these men get out of here and they deny their kids. So, I understand that. I get what the system is trying to do and I don't knock that, but it's definitely different situations that I would reconsider.... I understand the ones that said they don't want to do anything for their kids.... but then you got the ones that are like him—he's working, and he just can't afford the bill—and then [the custodial parent] is stuck with trying to decide whether to just drop benefits.”

—Custodial parent

- Participants who did not support the cooperation requirement generally believed that it should not be applied to every situation, given the complexity of family circumstances. For example, a few participants noted that the noncustodial parent was involved in the lives of their children and already providing some level of informal support outside of the child support system. These participants felt the cooperation requirement put custodial parents in a difficult position by making them choose between SNAP benefits and the financial

“I feel like it's not a good decision to include [cooperation requirements] for the SNAP benefits, because it's never been [done] previously... Don't try to include something, try to make a change all of a sudden when there's already a pandemic going on in the world. So that just makes it harder for women in what we already go through. We're trying to take care of our children.”

—Custodial parent

and in-kind supports provided by a noncustodial parent. They also noted that if cooperation requirements were intended to encourage noncustodial parents to participate in their children’s lives, the cooperation requirement shouldn’t require people to share information on a noncustodial parent who is already supporting their children monetarily and otherwise.

- As the cooperation requirement in Arkansas was still in an early stage of implementation, interview participants often expressed frustration and confusion about the policy change. These participants shared that the newly added requirement for SNAP made them feel unsupported, especially within the context of the COVID-19 pandemic that coincided with its implementation. Others shared that the SNAP cooperation requirement felt like a punishment for the custodial parents who were trying to provide for their children by accessing benefits.
- A few in-depth interview participants in Arkansas indicated that they understood why there should be a cooperation requirement for other assistance programs, but they did not support a mandatory cooperation requirement for SNAP. These participants noted that they had a dire need for SNAP benefits and felt they had no choice but to cooperate in order to feed their families.
- About one-third of participants in Arkansas expressed feeling uneasy about how the cooperation requirement would impact their relationship with the other parent or how the other parent might react when they found out about the child support case. Some participants shared stories about how their involvement in the child support system negatively affected their own relationship with the noncustodial parent or the other parent’s relationship with their children. Several participants described how this concern weighed on their decision to apply for SNAP.



“As I’m filling out or giving information, I had that fear—if I do this, what’s going to happen between me and the father or my kids and their father? But, of course, if I don’t do this, then what am I losing out on or can I survive or do it without the assistance.”

—Noncustodial and custodial parent

Participant Experiences With the Cooperation Requirement

Knowledge of the Cooperation Requirement

At least 10 participants learned about the cooperation requirement for the first time through paperwork that was sent to them in the mail. Others reported learning about it through word of mouth in their communities or networks. Many participants described hearing rumors about the cooperation requirement in their community through neighbors, family members, and social media. A few participants felt that SNAP agency workers only shared details about the cooperation requirement if participants explicitly asked about it.



“To be clear, everything I’ve learned, I’ve learned off of word of mouth from other people. No one ever contacted—like even when we had the interviews on the phone—no one ever said, ‘Oh, well, there’s child support requirements.’ Now that would have been something to know.”

—Custodial parent

Implementation Challenges Related to Cooperation

In-depth interview participants shared their experiences trying to stay in cooperation in Arkansas, commonly citing issues with the limited information they had about the noncustodial parent and communication challenges between the SNAP and child support agencies.

- Some participants felt they had been penalized for not knowing enough information about the noncustodial parent to be considered in compliance with the cooperation requirement.
- For some participants in Arkansas, the lack of communication and coordination between the child support and SNAP offices made it difficult to fully understand the implications of the cooperation requirement on their situation and whether they would receive a sanction. Others struggled to prove they were complying with the requirement. Several attributed their challenges to confusing explanations about what paperwork they needed to turn in and difficulties getting SNAP and child support agency staff on the phone. Overall, participants described experiencing a lot of back-and-forth between the two agencies or a lack of clarity when corresponding with staff from the two programs.

“If you don't know the information, they feel like you're avoiding them. And an incomplete form is considered not cooperating. But if I don't have the information, I can't tell you something I don't know.”

—Custodial parent

Exhibit 2.5. Participant experiences with sanctions and knowledge of good cause



* The participant who reported receiving a good cause exemption is also included in the count of participants who were informed or knew about it.

Good Cause Exemptions and Sanctions

About one-third of in-depth interview participants reported having experience with sanctions for noncooperation. Several respondents who learned about the requirement through paperwork in the mail reported receiving a letter or notice about the need to cooperate initially or to inform them of a sanction to their SNAP benefits for not cooperating. Some of these participants were frustrated by the approach to communication and the timing of sanction paperwork. For example, one participant said that a letter about the cooperation requirement was mailed to the incorrect address, so she didn't receive it and ultimately lost her SNAP benefits for a period of time.

“They did not have my address right whatsoever.... Now me and my kids don't have any food, because you didn't call me and verify this is the address before you sent out the letter. So, we were completely cut off.”

—Custodial parent

Among participants who discussed their knowledge of good cause exemptions, most said that they were not informed of or did not remember being told about them. The few who recalled being told about the cooperation requirement learned about it through varied means.



"If you ask about [good cause exemptions] too, they always say you have to comply. They don't tell you about any exemptions or possibilities where you don't have to comply."

—Custodial and noncustodial parent

- Those participants who recalled being told about the cooperation requirement said that they were informed by a caseworker or read it in the paperwork they received. Several of these participants did not pursue a good cause exemption because they believed their situation did not apply. One participant said that the caseworker made it seem like it needed to be a life-or-death situation to claim a good cause exemption.
- Some participants raised issue with how the information about good cause exemptions was shared with them and the limited circumstances that might qualify them for an exemption. One participant noted her SNAP caseworker made the cooperation requirement seem entirely mandatory.
- Other participants expressed frustration that exemptions were only available in cases of domestic violence and that there were no exemptions if you were still in a relationship with a noncustodial parent.

Impact of Cooperation Requirement on the Decision to Apply for Benefits

Many participants said the cooperation requirement did not affect their decision to apply for SNAP because the assistance they received through SNAP was so vital to their families, while others suggested the requirement made them apprehensive to pursue benefits or fully comply.

- Although many participants said they would still apply to SNAP with the cooperation requirement in place, some said they would rather forgo benefits than engage with and navigate the child support agency. These participants felt that the paperwork and the back-and-forth with child support and SNAP staff was overly burdensome and not worth the benefits they received.
- Others said they would still apply for SNAP but anticipated they would be sanctioned for noncooperation. These participants shared their negative feelings about being forced to comply with child support in order to receive the benefits they needed to feed their families.



"I was like, 'I'm not going to cooperate.' So, if I have to just let it go, then I'll just let it go and I'll just figure out what I got to do to feed me and my son."

—Custodial parent





Chapter 3 State Profile: Idaho

Since 1996, Idaho has mandated that SNAP cases subject to the cooperation requirement be referred to the child support program but has not always enforced these referrals with sanctions for noncooperation. As of September 2022, Idaho enforced cooperation with child support as a condition of eligibility for SNAP with sanctions for noncooperation. To document and understand the State’s cooperation requirement implementation experience, the study team conducted nine interviews with State SNAP leadership and SNAP staff from the local office in Boise and six interviews with State child support leadership and local child support staff in October and November 2022. To document and understand the State’s cooperation requirement from the perspective of participants, the study team conducted 25 in-person and virtual interviews with SNAP participants in the Boise area between October 2022 and March 2023.

3.1. SNAP and Child Support Program Context

The Idaho child support program and SNAP are housed within the Department of Health and Welfare (DHW), Division of Welfare. The Division of Welfare also administers the Temporary Assistance for Needy Families (TANF) program, Medicaid, and the subsidized child care program, along with other assistance programs for low-income families. Division of Welfare staff are responsible for determining eligibility for multiple assistance programs, including SNAP, TANF and general cash assistance, subsidized child care, and Medicaid.

Exhibit 3.1. Idaho SNAP and Child Support: Administrative structure and caseload size

 SNAP	SNAP agency	Department of Health and Welfare
	SNAP administration	State administered
	Number of SNAP households in FY 2022	60,950 ^a
 Child support	Child support agency	Department of Health and Welfare
	Child support administration	State administered
	Number of open child support cases in FY 2022	89,236 ^b

^a U.S. Department of Agriculture (2023).

^b Office of Child Support Services (2023).










The SNAP program is State administered. SNAP staff are located in each of the 17 local DHW offices throughout the State. Most applications for SNAP are taken over the phone. Individuals may also apply online for services or walk into a local office. The child support program is also State administered. Individuals seeking child support services may download the application forms online and mail them to a central office. Once received, applications are processed by child support intake workers who help households open a child support case and obtain all documentation necessary to establish a child support order. Idaho uses judicial procedures for establishing child support orders and administrative procedures for enforcing them. Once all

documentation is collected, intake workers transfer the case to the establishment team who refers it to contracted attorneys who file legal actions to establish parentage and obtain a child support order from the court. Attorneys are located in regional offices across the State. Households are assigned an attorney whom they can contact with questions about their case.

3.2. Cooperation Requirement Process in Idaho

The child support program and SNAP must coordinate and share information in order to implement the cooperation requirement. Exhibit 3.2 summarizes the key steps involved in that process.

Exhibit 3.2. Overview of child support cooperation requirement process in Idaho

	Households with children headed by custodial parents, guardians, or other caretakers are subject to the child support cooperation requirement. Initiation of the cooperation requirement process begins when one of these individuals applies for or is recertified for SNAP benefits.
	SNAP workers explain the cooperation requirement to the individual and collect information about the other parent. Applicants also listen to a recording that reviews the rights and responsibilities of SNAP participants. ^a SNAP workers also check the SNAP system to see if a cooperation status already exists for the applicant—for example, the applicant has been determined to be in cooperation by a different program, such as TANF, that has a cooperation requirement. If the applicant moves forward with applying for benefits, the SNAP workers will provide more explanation about the cooperation requirement and explain good cause exemptions.
	If all eligibility requirements are met and there is no pre-existing determination of noncooperation, the SNAP case will be opened for the household while the individual responds to child support requests necessary to open and work their child support case. If the individual has a pre-existing determination of noncooperation, the applicant will be instructed to work with child support to come into cooperation within 10 days. If they do not come into cooperation within 10 days, their SNAP household benefit is recalculated.
	The referral to child support occurs automatically via an integrated data system. Child support staff receive a notification of a new referral from SNAP.
	Once child support determines the household is appropriate for child support services, a worker begins working with the parent to open a child support case.
	If child support determines the individual is not cooperating, child support e-mails the SNAP program notifying them that the individual is noncooperative.
	SNAP receives a notification through the data system if child support has determined the individual to be noncooperative.
	If the individual is cooperating, the household continues to receive their full benefit amount.
	If the individual is not cooperating, the individual receives a letter and two phone calls from SNAP informing them that they have 10 days to cooperate or be sanctioned for noncooperation (that is, have their portion of the benefit removed and the benefit recalculated).

^a The recording is available in English and Spanish. If an interpreter is needed for another language, the interpreter will also go over rights and responsibilities in that language.

3.3. Cooperation Requirement: Motivation, Planning, and Early Implementation

Motivation

While Idaho has referred SNAP cases to child support since 1996, it has not always applied sanctions to non-cooperating individuals. Staff described that, during periods in which sanctions were not applied as a consequence for noncooperation, the rationale was that program leaders did not want to add undue burden to struggling families. However, even when sanctions were not applied for noncooperation, child support continued to pursue child support orders without the involvement of the parents. One staff member described that it was common practice for the child support program to initiate child support order hearings without the family present and establish orders by default for families who did not want services. Staff found that this process resulted in inaccurate orders and disruptions to family dynamics.

Staff described that, in 2017, the political climate provided support for reinstating the SNAP child support cooperation requirement. Staff described that the rationale for enforcing cooperation with sanctions was that households would not cooperate with child support without the potential for a penalty. Idaho began enforcing cooperation again by sanctioning custodial parent SNAP households that did not cooperate with child support. However, along with enforcing noncooperation with sanctions, the child support program also stopped pursuing child support orders if the family did not cooperate. One staff person stated that no longer pursuing orders for families that chose not to cooperate gave the family more decision-making power. Now, families could make a choice, though not without consequence, about whether or not they wanted to be involved with child support.

Planning and Rollout

In 2017, SNAP and the child support program needed to reinstate processes and procedures that enabled application of sanctions for noncooperation. This required the agencies to update their data systems and retrain staff on the proper procedures.

Because SNAP and child support were housed in the same department with other assistance programs that mandated cooperation, child support already exchanged some data with other assistance programs in the department. The main changes that had to be made included adding reports and features that would automate notifications from SNAP to child support. The child support program continued to make other updates to their data system to improve customer experience with the program. As part of these changes, they added a way for staff to record notes about the cooperation status and procedures for child support to notify SNAP of noncooperation status via e-mail.

SNAP and child support staff were also trained about the change. Child support staff described that frontline staff were trained on procedures for notifying SNAP about noncooperation status determination. SNAP staff described a top-down approach to training for and communicating

about the new policy. They explained that because this policy change represented a paradigm shift, program leadership had to communicate the policy change to program managers and managers to frontline staff. SNAP staff described that the retraining of staff on the policy shift from no consequence for noncooperation to sanctions for noncooperation took time and effort.

Staff reported that it took approximately 3 to 4 months from the time the policy change was announced to when the change was implemented.

When Idaho began enforcing the cooperation requirement again in 2017, SNAP staff started referring all existing and incoming cases they determined were subject to the cooperation requirement. This caused a backlog of referrals which child support staff worked through over time.

Exhibit 3.3. Characteristics of Idaho SNAP households subject to the cooperation requirement

SNAP and child support administrative records provide information about the experience of custodial parent SNAP households who were subject to the cooperation requirement. Although these data provide a useful snapshot of the characteristics and outcomes of those subject to the requirement, they do not represent the causal effects of the requirement. This is because they are likely affected by a variety of policy, demographic, and economic circumstances other than the requirement.

- 21 percent of SNAP households were subject to the cooperation requirement.
- 90 percent of households connected to child support were in cooperation with child support.
- The average child support order amount across orders for these households was \$426; however, on average, custodial parents received about \$220 across orders.
- The median age of the custodial parent head of household was 35.
- Over 90 percent of custodial parent SNAP households were headed by women.

For more information about findings from this analysis, see Main Report, Chapter 3. ▲

Implementation Facilitators

State and local SNAP staff described the factors that supported implementation of the cooperation requirement. Staff reported that leveraging past implementation experiences, standardizing practices across programs, and shifting responsibility to child support were all key to implementing the requirement.

Leveraging Experience Helped With Implementation Readiness

- Because Idaho had previously applied sanctions as a consequence for noncooperation, most staff felt that there was already a system in place to implement the requirement smoothly. Staff described that there were already ways for the data systems to talk to each other and that the effort to allow notifications between SNAP and child support was minimal.

Program Structure Facilitates Standardized Practice

- Child support staff reported that the structure of a State-run program with local enforcement teams helps ensure that there is little variation in practice across the State and that

participants have a consistent contact in the child support program to whom they can direct questions.

- Additionally, staff from both programs often cited that being housed within the same department reduced potential issues of conflicting messages from leadership.

Shifting Responsibility for Cooperation Requirements to Child Support Reduced Burden on Staff Across Programs

- Staff from both programs felt that shifting responsibility for cooperation determination to child support was an important improvement in the 2017 implementation of the requirement. SNAP staff described that, previously, they were required to collect information related to child support and send that information to child support, such as the number of partners the custodial parent had and date of their last menstrual cycle. SNAP workers were uncomfortable asking such personal questions. Under this older process, child support staff described receiving inaccurate and incomplete information from the SNAP program, which led to inaccurate orders being established. Now that child support has more responsibility for gathering information from the custodial parent, child support staff describe that they collect better information needed for opening a case.
- Child support staff described that before 2017, they would pursue a child support order for any case referred by SNAP, regardless of the custodial parent's desire to cooperate. Consequently, child support was working to open and establish cases for a larger population that was harder to serve. Child support staff describe that restricting their efforts to establish orders for only those cases that are cooperating reduced the amount of work for child support staff.
- Child support staff explained that caseworkers are required to make two phone calls and send one letter, which includes enrollment materials, to a custodial parent before making a cooperation determination. If the custodial parent does not return the phone calls and does not respond to the letter within 10 days of the letter being mailed, then the parent is determined to be in noncooperation. Child support staff describe that limiting their efforts to obtain cooperation reduces burden from the cooperation requirement.

Implementation Barriers

Despite several implementation facilitators, staff also identified roadblocks that created implementation challenges.

Additional Improvements to Data System Could Improve Implementation

- Although staff reported that the interface of the child support and Idaho SNAP data systems did work well, staff also pointed out some modifications that would further enhance the data systems. SNAP and child support staff noted that real-time updates when staff enter new data would help staff respond to client questions faster, rather than waiting for an overnight update.

- SNAP staff also described that they would like to be able to see the child support information themselves. SNAP staff described that parents often come to them confused as to why they were determined to be non-cooperative. SNAP staff felt that if they had access to the child support information, they could answer these questions directly rather than instructing parents to follow up with the child support program. However, SNAP program leaders described that they intentionally limit the amount of information SNAP staff can view and assign the responsibility of handling cases subject to sanction to a subset of staff. This results in fewer staff having discretion over sanction decisions and reduces worker-to-worker variation in practice.

Poor Communication Across Programs Creates Challenges for Participants

- Staff from SNAP and child support described situations in which communication between the agencies was challenging and resulted in the participants getting “stuck in the middle.” Staff described feeling that SNAP workers will tell participants they need to direct cooperation questions to child support, but then child support will tell them that the same question should be directed to SNAP, leading to participants having to go back and forth between the programs.
- Relatedly, child support staff described that they do not have a direct contact in the SNAP program to whom they can direct questions. Therefore, when a participant has a SNAP question, the child support staff must go through the same call-in line that a participant would use to get questions answered. Child support staff describe this as a barrier to smooth implementation.
- Finally, child support staff also reported that participants often have limited to no understanding of the cooperation requirement when child support gets in touch with them. Child support staff worry about the quality of information that SNAP provides to participants about the requirement and indicate that they spend a lot of time discussing the cooperation requirement with participants who appear not to have been previously informed about the requirement.

Staff Discretion for Good Cause Determination Leads to Uncertainty

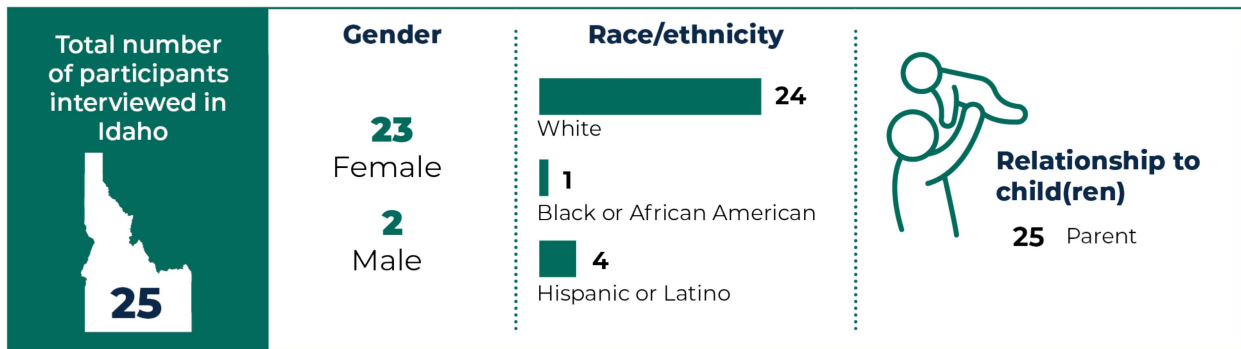
- SNAP staff are responsible for determining good cause exemptions from the cooperation requirement. SNAP staff described that this determination often occurs during the eligibility interview. SNAP staff explained that they collect information related to good cause exemptions by having a conversation with participants about the referral to child support and why the participant may not want to work with child support. No formal documentation is needed to prove a reason for good cause. SNAP staff describe that the good cause exemption policy allows for a great deal of staff discretion.
- SNAP leaders described having processes for frontline staff and supervisors to ask questions about policy and receive clarification. Despite these processes, some staff expressed confusion over certain scenarios, such as whether or not grandparent caretakers can receive a good cause exemption because of the nature of their relationship to the children on the case.

- SNAP staff described that sometimes participants do not divulge reasons for good cause exemptions to them but do share this information with child support. When child support contacts the SNAP worker reporting that the participant has a good cause reason for noncooperation, it creates confusion among some SNAP staff because they believe that only they have the authority to make that determination. Some staff described that they were unsure if they should accept child support’s report of a good cause exemption.

3.4. Participant Views and Experiences with the Cooperation Requirement in Idaho

Exhibit 3.4 provides an overview of the participants who were interviewed in Idaho, including their gender, race and ethnicity, and reported relationship to the children in their household.

Exhibit 3.4. Characteristics of in-depth interview participants in Idaho



Note: Respondents who identified as Hispanic or Latino are also included in other race categories.

Participant Perceptions of the Cooperation Requirement

In-depth interview participants in Idaho expressed a range of views about the cooperation requirement. A minority of participants supported the cooperation requirement for various reasons, citing custodial parents’ reliance on child support to support their families or their beliefs that parents should take responsibility for their children by paying child support.



“I think...[there] should be a requirement everywhere. It’s very, very important. Too many kids get not taken care of properly because of selfish parents. I mean they need to be held accountable for their kids. So it’s needed.”

—Custodial parent

More than half of the participants did not support a SNAP cooperation requirement or indicated that their feelings about the requirement varied based on family circumstances.

- Although several participants felt that the idea behind the cooperation requirement made sense and could work in some situations, they did not believe it worked well based on their experiences. Some of these participants felt that the requirement might be better if it was more flexible and considered people’s individual situations instead of being a one-size-fits-all policy. Others suggested that it should be an optional policy so that no one is forced to cooperate just to receive food benefits.

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“I definitely think that it’s not a one size fits all. I think everybody has a different situation. I think they need to take that in account that everybody has different situations...you never know what situation people are in. And not everybody has the courage to even speak up and say [talk about] certain situations.”

—Custodial parent

- Others expressed negative sentiments about the requirement because it is difficult to cooperate for various reasons, including the lack of coordination between agencies and participants having limited information about the noncustodial parent. A few shared that it takes a lot of time and effort to ensure that they are cooperating correctly.
- Despite cooperating, some did not see the value in the cooperation requirement because they received little or no money through child support and it did not improve their household finances.

Participant Experiences With the Cooperation Requirement

Communication About the Cooperation Requirement

Most participants in Idaho said that they found out about the requirement at application or during early conversations with their SNAP worker.

- Many participants described a straightforward process of cooperation, which included filling out paperwork and sending in the required information. One participant described feeling “okay” about the process because it was “easier than being the one trying to get [the other parent] to pay.” However, a few suggested that the process took extra time and required additional back-and-forth on their part to “get everything where it needed to be.”
- After taking these necessary steps, many participants said they didn’t receive any updates or follow-up communication from the agencies about their case. Several participants who needed to follow up with the agency to discuss questions, issues, or more complicated situations reported having a difficult time working with or getting in contact with staff at the agencies.

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“Like in my case, the child support does not outweigh the SNAP that I was receiving. So he wasn’t paying it anyways, so like I don’t believe that the requirement should be there.... People in situations like mine, they don’t benefit from that requirement.... It seems like we’re faulted for that requirement if that makes sense.”

—Custodial and noncustodial parent

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“It’s easy for them to get in contact with me, but when I would like call, they don’t ever answer. You’ve got to get that call back. And sometimes it can take up to like two days.”

—Custodial and noncustodial parent

Impact of Cooperation Requirement on Relationships

Participants shared several concerns about how the cooperation requirement impacts their relationships with the other parent or expressed concerns about the other parent’s financial situation.

- Some shared how their cooperation led to disagreements with the other parent, whereas others were concerned that the requirement might lead to a more dangerous situation for them or their children.
- Others expressed concern about the negative impact it can have on the noncustodial parent’s financial situation. A few discussed circumstances in which the noncustodial parent didn’t have the ability to pay, but there was limited flexibility to reduce the amount of the child support order once established.

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 “[The decision to cooperate] caused a little bit of fighting and I had to explain to him like, ‘It’s not me. We just have to cooperate and get this situated.’ But I see why they do it, because if you’re a single parent and you’re requiring assistance, their thought is, ‘We’ll make the dad step up if they’re not.’ Which makes sense, but sometimes creates a little bit of like rift in there.... It just spills over into your home life a little bit more.”

—Custodial and noncustodial parent

Exhibit 3.5. Participant experiences with sanctions and knowledge of good cause



* The participant who reported receiving a good cause exemption is also included in the count of participants who were informed or knew about it.

Sanctions and Good Cause Exemptions

Most interview participants in Idaho did not have experience with sanctions. One participant described having their benefits reduced as they didn’t cooperate with child support initially because they feared the noncustodial parent. However, they eventually provided child support with the needed information and had their benefits restored.

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 “I didn’t know that [the good cause exemption] was an option. Otherwise, I would have [requested it] because my first ex-husband and I, even the divorce was filed through domestic violence.”

—Custodial and noncustodial parent

About three-quarters of interview participants in Idaho shared that they never heard of good cause exemptions or did not recall being told about them. Some who did not recall being told about the exemptions described reasons why they might have needed an exemption, including concerns about their safety. A few participants said that they remember being told about good cause exemptions. One participant who successfully received a good cause exemption explained how it was “stressful” for them every time they had to describe their good cause circumstances to a caseworker.

Impact of the Cooperation Requirement on the Decision to Apply for Benefits

Almost all interview participants in Idaho said that they would still cooperate with the requirement because they needed the food assistance that SNAP provided. These participants often discussed how important the SNAP benefits were in feeding themselves and their children, noting that they couldn't afford to go without them.



"I mean when you're desperate, you need help, you kind of just got to do what you got to do."

—Custodial and noncustodial parent

However, a few described their decision to cooperate as a challenging one or one they were reluctant to make. For example, one participant said that the cooperation requirement process made them "open old wounds," and another discussed having to weigh their concerns for their child's safety against their need for food.



"It's definitely hard balancing the fear of getting food money taken away and not being able to feed her or protecting myself and my family."

—Custodial parent

Chapter 4 State Profile: Kansas

Kansas approved the adoption of a child support cooperation requirement in SNAP in 2015. To document and understand the State's cooperation requirement implementation experience, the study team interviewed State and local program leaders from SNAP and child support and frontline staff from two local SNAP offices (Topeka and Osawatomie) and two regional child support offices. In all, the study team interviewed 19 SNAP staff members and 16 child support staff members in July 2022. To document and understand the State's cooperation requirement from the perspective of participants, the study team conducted 25 in-person and virtual interviews with SNAP participants from Shawnee County in January 2023.



4.1. SNAP and Child Support Program Context

The Kansas child support program and SNAP are housed within the State's Department for Children and Families (DCF). SNAP is administered in Kansas by the Economic and Employment Services Division (EES) within DCF. In addition to SNAP, EES administers the Temporary Assistance for Needy Families program (TANF) program and the subsidized child care program, along with other assistance programs for low-income families. DCF operates 36 local service centers throughout the State where individuals can apply for SNAP and other assistance programs. SNAP cases are handled by workers who may also be responsible for determining eligibility for TANF and subsidized child care. Individuals can apply for SNAP online or in-person at local offices. SNAP cases are centrally processed and are assigned to workers across the State.

The child support program is administered by the Child Support Services Division of DCF. Kansas privatized all child support services in 2013, two years before the SNAP cooperation requirement legislation was passed. The child support program is administered by the State and services are provided by private vendors at the county-level. In 2013, four vendors were providing child support services in Kansas. In 2021, new contracts were awarded, and the number of child support vendors decreased from 4 to 2: Maximus currently serves two counties, which accounts for about one-third of the statewide child support caseload, and YoungWilliams provides child support services to the rest of the State.

Individuals may apply for child support services online, by telephone, or in-person at one of the 11 child support offices in the State. Kansas uses judicial procedures for establishing and enforcing child support orders. Child support intake workers help families open a child support case and obtain all documentation necessary to establish a child support order. Once all documentation is collected, intake workers transfer the case to the establishment team, who files legal actions to establish paternity, if necessary, and obtain a child support order from the court. Caseworkers on the establishment team identify the cases that require legal action, such as contempt of court actions due to nonpayment, and attorneys are responsible for filing those legal documents.

Exhibit 4.1. Kansas SNAP and Child Support: Administrative structure and caseload size

 SNAP	SNAP agency	Department for Children and Families, Economic and Employment Services Division
	SNAP administration	State administered
	Number of SNAP households in FY 2022	96,710 ^a
 Child support	Child support agency	Department for Children and Families, Child Support Services Division
	Child support administration	State administered with services provided by private vendors at the county-level
	Number of open child support cases in FY 2022	131,490 ^b









^a U.S. Department of Agriculture (2023).

^b Office of Child Support Services (2023).

4.2. Cooperation Requirement Process in Kansas

The child support program and SNAP must coordinate and share information in order to implement the cooperation requirement. Exhibit 4.2 summarizes the key steps involved in that process.

Exhibit 4.2. Overview of child support cooperation requirement process in Kansas

	Custodial parents in households with children are subject to the child support cooperation requirement in SNAP, beginning when an individual applies for or is recertified for SNAP benefits. ^a
	SNAP workers explain the cooperation requirement to the individual and collect information about the other parent. SNAP workers also check the SNAP system to see if a cooperation status already exists for the applicant—for example, the applicant has been determined to be in cooperation by a different program, such as TANF, that has a cooperation requirement. The worker will also explain good cause exemptions.
	If all eligibility requirements are met and there is no pre-existing cooperation determination, the SNAP case will be opened for the full household while the individual responds to child support requests necessary to open and work their child support case. If the individual has a pre-existing determination of noncooperation, the applicant will be instructed to work with child support to come into cooperation within 10 days before their SNAP household benefit is recalculated.
	The referral to child support occurs automatically via an integrated data system. Child support workers receive a notification of a new referral from SNAP.
	Once child support determines eligibility for child support services, a worker begins working with the parent to open a child support case.
	Child support determines if an individual has cooperated with their efforts to establish a child support case.
	SNAP receives a notification through the data system that cooperation status has been entered or updated.
	If the individual is cooperating, the household will receive its full SNAP benefit amount.



If the individual is not cooperating, the individual receives a letter informing them that they have 10 days to cooperate with child support services or be sanctioned for noncooperation (that is, have their portion of the benefit removed and the benefit recalculated).

^a 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 has the ability to request that noncustodial parents receiving SNAP who have failed to pay child support, return paperwork, or comply with genetic testing 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.

4.3. Cooperation Requirement: Motivation, Planning, and Early Implementation

Motivation

The SNAP child support cooperation requirement in Kansas was enacted by the State legislature in 2015 as part of House Bill 2258, known as the HOPE Act. Several staff described that the motivation for adopting the SNAP cooperation requirement stemmed from the interest among some members of the State legislature in connecting families eligible for child support with those services.

Planning and Rollout

The SNAP cooperation requirement followed the same policies and procedures as the cooperation requirement for TANF and subsidized child care recipients. Before adoption of the HOPE Act, SNAP workers were already able to refer SNAP applicants to the child support program if the applicant requested a referral. Because the practice of voluntary referrals was already in place when the SNAP cooperation requirement became mandatory, many SNAP workers were already familiar with the referral process, including the channels of communication between SNAP and child support workers and the information in the data system that SNAP workers used to make the referrals.

The State planned to implement the SNAP cooperation requirement within one year after the passage of the HOPE Act. Child support and SNAP staff described a phased approach to implementation in which only new SNAP cases were referred to child support for cooperation. Existing cases were assessed for whether they were subject to the cooperation requirement as part of interim reporting or recertification processes. Staff did not recall any outreach or notification to participants regarding the new cooperation requirement.

State-level child support and SNAP staff informed local-level staff about the policy change. Both programs issued email notifications and developed trainings to help staff implement the cooperation requirement. The addition of SNAP cases to those that required referral to child support was not a major change to their operations and procedures. They had already been making voluntary referrals for SNAP cases, and they followed the same cooperation guidelines for TANF and subsidized child care recipients.

Under a separate effort in 2015, SNAP was also modernizing its data system. As part of the SNAP cooperation requirement planning process, the new system incorporated necessary updates to facilitate the automated case referral process from SNAP to the child support program.

Exhibit 4.3. Characteristics of Kansas SNAP households subject to the cooperation requirement

SNAP and child support administrative records provide information about the experience of custodial parent SNAP households who were subject to the cooperation requirement. Although these data provide a useful snapshot of the characteristics and outcomes of those subject to the requirement, they do not represent the causal effects of the requirement. This is because they are likely affected by a variety of policy, demographic, and economic circumstances other than the requirement.

- 30 percent of SNAP households were subject to the cooperation requirement.
- 90 percent of SNAP households connected to child support were in cooperation with child support.
- The average child support order amount across orders for these SNAP households was \$416; however, on average, custodial parents received about \$219 across orders.
- The average SNAP benefit amount decreased by \$65 per month after implementation of the cooperation requirement.
- Parentage establishment and child support orders increased by 15 percent and 5 percent, respectively, for SNAP households with children after implementation of the cooperation requirement.
- There was no corresponding increase in the child support order amount or in the amount of child support payments families received.
- The median age of the custodial parent head of household was 35.
- Over 90 percent of custodial parent SNAP households were headed by women.

For more findings from this analysis, see Main Report, Chapter 3. ▲

Implementation Facilitators

State and local staff described the factors that supported cooperation requirement implementation. Automated processes and closely aligned cooperation policies across programs facilitated implementation.

Data System Features Enhance Implementation

- The Kansas child support and SNAP data systems include automated processes that ease implementation of the cooperation requirement. The child support data system is automatically updated on a nightly basis with all the referrals from the SNAP data system. Additionally, the EES SNAP data system automatically receives updated cooperation statuses for clients. Child support workers also email memos to SNAP on SNAP participants' cooperation status.

Policy Alignment Eases Implementation

- Staff responsible for administering SNAP are also involved in administering benefits for TANF and subsidized child care. The policies align closely for the three programs and staff follow the same process for referring SNAP participants to child support. Additionally, these staff were already making voluntary referrals from SNAP to child support. For these reasons, shifting to mandatory cooperation for SNAP did not constitute a significant change for these workers.

Implementation Barriers

Child support and SNAP staff also identified challenges that hindered implementation of the SNAP cooperation requirement:

Limited and Inaccurate Exchange of Data Can Cause Delays in Case Processing

- Although the automated processes through which the Kansas SNAP and child support data systems interface typically works seamlessly, the interface does not always share updated data or work as designed. When information does not interface between the systems properly, individuals could be left waiting to get confirmation of their cooperation status. In this scenario, SNAP and child support staff resort to contacting each other to confirm updates that were not processed automatically.
- Child support staff described receiving many referrals for cases that were invalid or inappropriate for child support services, which created a substantial amount of additional work for them. For example, staff said they often receive referrals for cases where the parents are in the home together, which would not qualify for a child support referral. Child support staff describe that inappropriate referrals like this require the worker and a supervisor to take additional steps to deactivate the referral.

Multiple Attempts to Contact Individuals Referred to Child Support Slows the Cooperation Determination Process

- Child support workers reported making several attempts to contact individuals referred to child support before placing them in noncooperation. Workers reported spending up to three months contacting an individual. These multiple attempts can be burdensome to workers and limit them from taking on additional cooperation cases. Staff expressed interest in updating the policy to make it clear that workers are only required to attempt contact four times.

SNAP Participants Need More Education About the Cooperation Requirement

- It was reported that the planning and implementation process did not include community outreach. Child support workers described families that were upset about the requirement to cooperate with child support as a condition of receiving SNAP. Child support staff felt that families were uninformed about the cooperation requirement and were often surprised when child support contacted them.

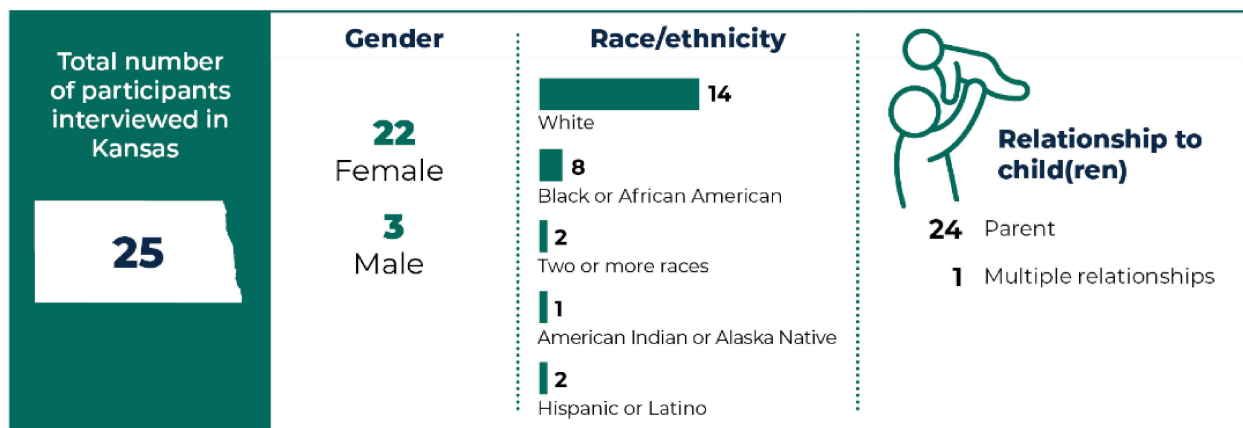
Having a Third-Party Provider of Child Support Services Can Create Communication Challenges

- Some SNAP staff reported that working through child support vendors as opposed to child support staff employed by the State adds a layer of complexity to the coordination between the two programs.

4.4. Participant Views and Experiences with the Cooperation Requirement in Kansas

Exhibit 4.4 provides an overview of the participants who were interviewed in Kansas, including their gender, race and ethnicity, and reported relationship to the children in their household.

Exhibit 4.4. Characteristics of in-depth interview participants in Kansas



Note: Respondents who identified as Hispanic or Latino are also included in other race categories.

Participant Perceptions of the Cooperation Requirement

Most interview participants in Kansas did not fully support the SNAP cooperation requirement because they believed that it did not work well for all situations or provide enough exceptions or flexibilities. These participants elaborated on various circumstances, including their own, in which they did not think the cooperation requirement would work well for all families.

- Some felt that, although the cooperation requirement might be suitable for some families, it was not good for them or their children. A few cited experiences in which the cooperation requirement worsened their own situations; for example, if they received more money from the other parent informally before they were required to open a child support case. In these cases, the respondents believed that not all custodial parents needed to be or should be forced to cooperate, with a few participants suggesting that there should be more exceptions or greater flexibility. For example, the custodial parent could receive an exemption from

“It was easier [outside of the formal child support system]. Because if they needed something and I didn't have the money for it, then all I had to do was call him and he would go do it.... And our relationship like completely changed after [the cooperation requirement]. And I got way less through child support enforcement than what he was doing without the child support enforcement.”

—Custodial parent

cooperating if the noncustodial parent was already providing support or if they believed there was a danger of damaging their relationship with the noncustodial parent.

- Some participants focused on how the cooperation requirement might be harmful for other individuals or families, depending on their situations. A few mentioned that they didn't support the cooperation requirement because they were worried about others whose safety might be in danger if they were forced to cooperate.
- Some respondents did not see the value of the requirement based on their own experiences. These respondents often had done everything they needed to in order to cooperate but were not receiving child support payments. This meant that respondents were expending the additional time required to cooperate or dealing with animosity from the other parent without receiving any of the financial benefits intended by the requirement. Others simply did not have the necessary details about the other parent, which meant they were unable to provide the required information or had to spend time tracking it down to receive their SNAP benefits.



"It really seemed like I was doing a lot of the work to find out where the absent parents were and where they worked, because child support enforcement was so slow. They hear something about him having a job here. And then they take a couple of weeks to send the enforcement papers to the office—and by then, they're gone. It just seems like forcing people to do that, they could put more effort in.... to actually get the payments from the parents."

—Custodial parent with multiple relationships to children in household

Participants who did express positive views of the requirement did so for a few reasons—most of which hinged on taking responsibility or providing fairness.

- Most participants with favorable views of the requirement felt it was beneficial because it helped them pursue and receive child support without having to do the work on their own, which helped them afford things for their families. Some of these participants felt the requirement was a way to ensure that noncustodial parents took financial responsibility for their children. Others believed the cooperation requirement increased transparency about the amount of money a household has available in instances where another parent might be informally contributing.



"If they didn't do [the cooperation requirement] that way, then I feel like people could sneak around and get extra and not report it. And SNAP has no idea that they're getting this income. It's not documented anywhere versus where you have documentation through child support.... It protects the State interests...and then it protects the person, because those who really need [SNAP] are using it for the purpose it was designed for."

—Custodial parent

Participant Experiences With Cooperation Requirement

Many participants described experiencing challenges related to the cooperation requirement in Kansas—namely, gathering the information required to cooperate and providing that information to the child support agency.

- Some participants expressed frustration with the cooperation requirement process more generally because they didn't know the information about the other parent or didn't understand why they needed to provide the information in the first place. Some described instances of not knowing required information, such as the current workplace, current address, or social security number of the noncustodial parent. In some cases, participants indicated that they did not know who the noncustodial parent was and had no information about that person, and they were still held to the requirement even though it was not in their power to comply with it.

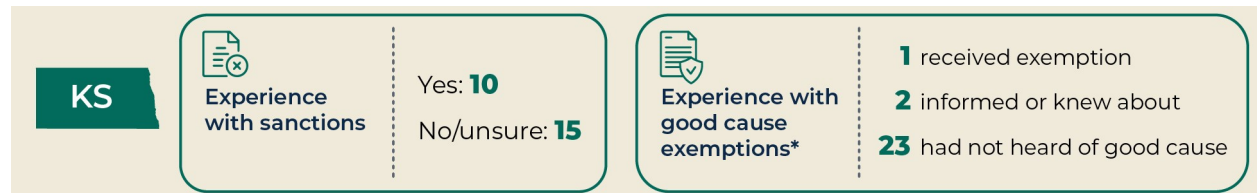


"The only difficult part was when I came to the father part, because there wasn't any other place that I could put do not know or any of that. It was just the name the workplace, the social security number, which I wouldn't even know."

—Custodial parent

- Several respondents expressed frustration in attempting to successfully comply with the cooperation requirement over time. These participants described having to provide the information necessary to cooperate initially and multiple times thereafter. Generally, these respondents did not see any benefit of providing the same information over and over again and some described it as draining.

Exhibit 4.5. Participant experiences with sanctions and knowledge of good cause



* The participant who reported receiving a good cause exemption is included in the count of participants who were informed or knew about it.

Sanctions and Good Cause Exemptions

Many interview participants in Kansas reported having experience with sanctions, while very few said they were made aware of good cause exemptions.

- All the participants who had experience with sanctions learned about it from a letter in the mail, with many expressing frustrations about this process. Generally, these participants found it difficult to get in touch with program staff via phone if they had follow-up questions related to the letter. Many were confused about why they were being cut off from benefits despite attempting to stay in cooperation.



"I even got cut off of it because they said that they couldn't locate him, which should not be my issue. I gave you his name, his address, his phone number. I gave you his employer.... But I never got anything. I even got penalized for it."

—Custodial and noncustodial parent

- Almost all participants who were asked if they were aware of good cause exemptions said they did not know about them. A few shared that they even asked their caseworkers specifically about the opportunity for potential exemptions because of their situation, but their caseworker was not able to adequately explain their options. A few who had situations that might have qualified them for a good cause exemption explained that they were not concerned about getting one because they already felt sufficiently distanced and safe from the noncustodial parent.

Impact of the Cooperation Requirement on the Decision to Apply for Benefits

Most interview participants felt that they would still make the decision to cooperate because they rely on their SNAP benefits, while others felt that their original decision to cooperate might have been different had they understood the requirement better.

- When asked, most participants said that they would still cooperate with the requirement in order to receive their SNAP benefits because they needed them to feed their family. However, some said they felt like doing so "came with a price," such as the noncustodial parent being upset for being put on child support. One participant described weighing their options and ultimately deciding that the risk of not having enough food for their children outweighed the risk of what might happen when they put the noncustodial parent on child support.



"It was one of those things that I felt like I had to—because if I didn't, then my kids wouldn't have anything to eat. So, I honestly would have to say that I would have [cooperated] no matter what."

—Custodial parent

- Others felt that their original decision to cooperate might have been different had they understood the implications of the requirement and how it might impact their families and relationships. For example, one participant said they would not have applied because their child's parent was quite upset after being put on a child support order.

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Chapter 5 State Profile: Michigan



Michigan adopted a child support cooperation requirement in SNAP in 1996. To document and understand the State’s cooperation requirement implementation experience, the study team conducted 18 interviews with State and local SNAP leadership and frontline staff and 11 interviews with State and local leadership and child support frontline staff in two areas (Monroe County and Oakland County) between June and July 2021. The study also interviewed one representative from a State-based advocacy agency. To document and understand the State’s cooperation requirement from the perspective of participants, the study team conducted 25 in-person and virtual interviews with SNAP participants from Wayne County in January 2023.

5.1. SNAP and Child Support Program Context

In Michigan, the child support cooperation requirement in SNAP is implemented by the State’s Department of Health Human Services (DHHS). DHHS administers both the child support program and SNAP. DHHS also administers the TANF program, Medicaid, and the subsidized child care program, along with other assistance programs for families with low incomes.

The DHHS Office of Child Support works with the Prosecuting Attorney’s Office and the Friend of the Court—a separate judicial entity in Michigan and part of the Family Division of Circuit Courts—to provide child support program services throughout the State. A centralized unit of State-level child support staff receive and process child support applications from all parents and referrals from SNAP. Once a child support case is opened, the case is referred to the county-based Prosecuting Attorney’s Office or Friend of the Court. The Prosecuting Attorney’s Office works with families to establish paternity and a child support order and the Friend of the Court handles order enforcement and modification.

Exhibit 5.1. Michigan SNAP and Child Support: Administrative structure and caseload size

 SNAP	SNAP agency	Department of Health and Human Services, Food Assistance Program
	SNAP administration	State administered
	Number of SNAP households in FY 2022	719,803 ^a
 Child support	Child support agency	Department of Health and Human Services, Office of Child Support
	Child support administration	County administered
	Number of open child support cases in FY 2022	779,981 ^b










^a U.S. Department of Agriculture (2023).

^b Office of Child Support Services (2023).

5.2. Cooperation Requirement Process in Michigan

The child support program and SNAP must coordinate and share information in order to implement the cooperation requirement. Exhibit 5.2 summarizes the key steps involved in that process.

Exhibit 5.2. Overview of child support cooperation requirement process in Michigan

	Households with children headed by custodial parents are subject to the child support cooperation requirement. Initiation of the cooperation requirement process begins when a parent applies for or is recertified for SNAP benefits.
	SNAP workers review the information that SNAP applicants provide in the initial application or during recertification to determine whether they are subject to the cooperation requirement. SNAP workers also check the SNAP eligibility system to see if a cooperation status already exists for the applicant—for example, the applicant has been determined to be in cooperation by a different program, such as TANF, that has a cooperation requirement. If the SNAP worker determines that an individual will need to cooperate with child support, the worker will provide more explanation about the cooperation requirement. The worker will also explain good cause exemptions.
	If all eligibility requirements are met and there is no pre-existing cooperation determination, the SNAP case will be opened for the full household while the individual responds to child support requests necessary to open and work their child support case. If the individual has a pre-existing determination of noncooperation, the applicant will be instructed to work with child support to come into cooperation within 10 days before their SNAP household benefit is recalculated.
	The referral to child support occurs automatically via an interface between the SNAP and child support data system. State child support staff receive a notification of a new referral from SNAP.
	Once eligibility for child support services is determined and the case is started by State child support staff, the case is then referred to the Prosecuting Attorney's Office, which initiates a court case to establish parentage (if applicable) and the child support order.
	State child support staff or the prosecuting attorney determine whether an individual has cooperated with their efforts to establish a child support case.
	SNAP receives a notification through its data system if child support or the prosecuting attorney have determined the individual to be noncooperative.
	If the individual is cooperating, the household will receive their full benefit amount.
	If the individual is not cooperating, the individual receives a letter informing them that they have 10 days to cooperate or be sanctioned for noncooperation (that is, have their portion of the benefit removed and the benefit recalculated).

5.3. Cooperation Requirement: Motivation, Planning, and Early Implementation

Motivation

The cooperation requirement in SNAP has been in place in Michigan since 1996, after the passage of the Personal Responsibility and Work Opportunity Reconciliation Act, which gave States the option to require child support cooperation as a condition of receiving SNAP benefits.² Child support leaders explained that cooperation requirements have historically been a part of all assistance program receipt in Michigan. Child support leaders explained that cooperation requirements fit with the dominant perspective that as many individuals should take advantage of child support services as possible. In Michigan, even private divorce cases are connected to the public child support program.

Exhibit 5.3. Characteristics of Michigan SNAP households subject to the cooperation requirement

SNAP and child support administrative records provide information about the experience of custodial parent SNAP households who were subject to the cooperation requirement. Although these data provide a useful snapshot of the characteristics and outcomes of those subject to the requirement, they do not represent the causal effects of the requirement. This is because they are likely affected by a variety of policy, demographic, and economic circumstances other than the requirement.

- 20 percent of SNAP households were subject to the cooperation requirement.
- Nearly 100 percent of households connected to child support were in cooperation with child support.
- The median age of the custodial parent head of household was 34 years old.
- Over 90 percent of custodial parent SNAP households were headed by women.
- The average child support order amount across orders for these SNAP households was \$332; however, on average, custodial parents received about \$219 across orders.

For more findings from this analysis, see Main Report, Chapter 3. ▲

Implementation Facilitators

Michigan has required cooperation with child support for nearly 30 years. As such, staff in both child support and SNAP describe implementation as part of their typical operations and did not note many factors that specifically supported implementation of the requirement in SNAP.

Automated and Interfacing Data Systems Facilitate Communication Across Programs

- State and local-level SNAP and child support staff described that having an automated interface between the SNAP and child support offices was important for creating a smooth transfer of information and participant referrals. Through the current SNAP and child support interfaces, SNAP staff can view the cooperation status of individuals on their caseload and any child support payments being made to the household. SNAP staff use this information to communicate participants' benefit eligibility and cooperation status more effectively. SNAP

² No staff interviewed were in their roles in 1996. Therefore, the study did not collect any information on the planning and rollout of the cooperation requirement in Michigan.

workers specifically reported that the interfacing systems allow them to track cooperation status and allows them and their child support counterparts to view case status.

Implementation Barriers

Staff also identified barriers to ongoing implementation of the cooperation requirement.

Data Entry Issues Can Create Challenges for Child Support Staff and Participants

- If SNAP workers do not verify information about participants' households, such as addresses or children's relationships with the SNAP participant and noncustodial parent, it can create challenges for child support workers. Child support workers explained that this lack of updated or accurate information can generate invalid referrals. This can result in child support workers contacting SNAP participants, opening unnecessary cases, and potentially sanctioning parents who are not actually subject to the cooperation requirement.
- If child support workers do not make timely cooperation status updates in the system, it can subject SNAP participants to extended sanctions. SNAP staff explained that it can take up to three days to reach child support staff by phone or email to verify cooperation determinations and update the system. Sanctions can only be lifted once the system is updated and reflects that the Office of Child Support has determined the participant is in cooperation. SNAP workers also explained that SNAP participants can request a hearing with DHHS if they are unjustly sanctioned. SNAP staff are held responsible for the outcomes of these hearings.

Lack of Understanding Around Good Cause Exemptions May Compromise Safety

- SNAP leaders expressed concerns that SNAP staff lack a strong understanding of good cause exemptions and their role in determining good cause. Leaders explained that the conversations about good cause exemptions are difficult to have with SNAP participants because the subject matter is sensitive. This lack of understanding increases the risk of referrals to child support in cases where there is a risk of family violence. Individuals who fear for their safety then may not cooperate with child support and might experience a reduction in their SNAP benefits.
- SNAP leaders have proposed more standardized training about the process and SNAP staff's role in good cause determination. SNAP leaders also explained that they are considering adding a prompt to the initial application that asks participants if they have fears that cooperation with child support will elicit family violence or retribution to help SNAP workers introduce the good cause exemption conversation.
- The Office of Child Support has specifically trained its staff on identifying family violence. Child support leaders have a desire to shift more responsibility for good cause determinations to child support workers to extend support for participants that are eligible for good cause exemptions.

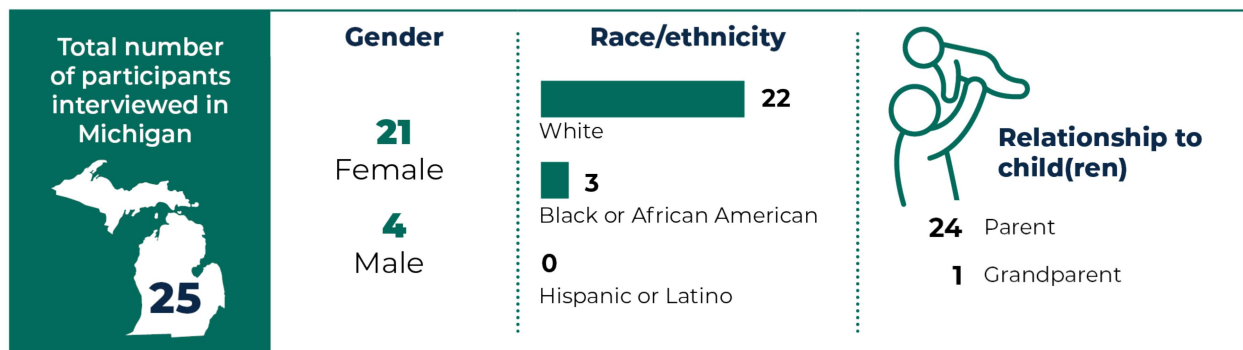
SNAP Participants Do Not Fully Understand the Role of Each Office in Cooperation Determinations

- SNAP and child support workers explained that participants often require more explanation of what the cooperation requirement is and what they must do to maintain their benefits. Staff noted that some participants do not understand which offices to contact with questions or concerns about the cooperation requirement. SNAP workers described that participants often call the SNAP office to understand what they should do to be in cooperation instead of the child support office or the Prosecuting Attorney’s Office. This confusion can delay processing of important case information and lead to frustration among participants.

5.4. Participant Views and Experiences with the Cooperation Requirement in Michigan

Exhibit 5.4 provides an overview of the participants who were interviewed in Michigan, including their gender, race and ethnicity, and reported relationship to the children in their household.

Exhibit 5.4. Characteristics of in-depth interview participants in Michigan



Participant Perceptions of the Cooperation Requirement

Participants in Michigan had mixed views about the cooperation requirement. About one-third of participants in Michigan indicated that they did not have an issue with the cooperation requirement or with providing the necessary information about the other parent. These participants generally felt it was easy to provide the necessary information and that the intention of the policy was to help custodial parents collect the child support that was owed to them.

“But I don't think they were denying people, I think they were just trying to help mothers collect child support from the dads. I never not cooperated with them.”

—Custodial parent

However, many participants in Michigan did not support the cooperation requirement, or they believed it should not be required in all circumstances.

- Some did not support the cooperation requirement because they believed it forced them to participate in the child support program when they did not want to. These participants cited several reasons why they didn't want to open a child support case, including concerns about domestic violence and the punitive enforcement actions the other parent would be subject to if they failed to pay.
- Others did not support it because they believed it required them to provide too much information to the agencies, which could be burdensome for those who didn't have the information readily available. Pursuing the information about the other parent also raised safety concerns for those who had experienced abuse.

//////
"I just don't feel it's right. What if he don't have enough money to pay these amounts or he got multiple kids? He's going to jail or he's going to have a warrant out for his arrest."

—Custodial parent

Participant Experiences With the Cooperation Requirement

Knowledge of the Cooperation Requirement

Some participants in Michigan found out about the cooperation requirement when they first applied for SNAP benefits, either from their SNAP worker or on an application form. Some participants did not know about the cooperation requirement until they received warning letters about a potential sanction or noticed their benefits had been lowered due to noncooperation. About one-third of participants first learned about the cooperation requirement when they received a sanction. For participants who received sanctions, many reported receiving a notification in the mail about their benefits being lowered but didn't remember seeing anything about the cooperation requirement before that.

//////
"I was surprised to find out that they would pursue child support. It wasn't really openly stated in the paperwork. It's part of the application. When you going to apply, they just ask you for the other parent's information, but it isn't stated 'Hey, we're going to pursue this person for child support or to get help for you.'"

—Custodial parent

Implementation Challenges Related to Cooperation

- Some participants reported negative experiences with workers at both SNAP and child support offices during the cooperation process. These participants cited difficulties communicating with staff, such as incidents where their SNAP workers didn't receive paperwork they sent in, or challenges scheduling in-person meetings with their SNAP workers when issues arose. A few participants described situations where they felt as though the staff members they interacted with lacked empathy for their situations. One participant

//////
"I was afraid that they were going to have my address on the paperwork that they sent to him, because they do have the address of both parties. And I was terrified, you know...even to the point where I was just like, 'You know what? Forget it, I'll just work harder. I'll just, you know, do what I need to do.' That's how afraid I was."

—Custodial parent

shared that negative interactions with a SNAP worker might lead to participants withholding information required to cooperate for fear of judgment. A few participants described having positive experiences with SNAP and child support agency staff when sharing information involved with the cooperation requirement. For example, one participant described their SNAP worker as “friendly” and felt that workers “try to help out as much as they can.”

- Most participants felt the cooperation requirement made sense and that providing information on the noncustodial parent was straightforward. However, a few participants shared concerns about not having enough information on the noncustodial parent to be considered “compliant.” These participants worried that their lack of information about the other parent would negatively impact their ability to receive benefits. A few participants also shared that the cooperation requirement did not make sense to them because they doubted opening a child support case would actually lead to them receiving financial support from the noncustodial parents.

“They don't have no sympathy for anybody.... How can you simply ask somebody that you never know their situation or the outcome or what happened? And my thing is...that would make women not want to open up to people about certain situations because of people like that.”

—Custodial parent

Good Cause Exemptions and Sanctions

More than half of the participants did not recall being told about good cause exemptions. Some who were not told about the exemption felt that they might have pursued one if they had known about the option.

Exhibit 5.5. Participant experiences with sanctions and knowledge of good cause



* The participant who reported receiving a good cause exemption is also included in the count of participants who were informed or knew about it.

Several participants did have experiences with noncooperation or sanctions. A few participants described their experience of noncooperation as feeling very abrupt. They didn’t have a recollection of being told what they needed to do or fix until they received notice that their benefits were being reduced for their failure to cooperate. Some recalled being told they were not in compliance because they lacked the information they needed about the other parent, with several noting how difficult it was for

“They didn't tell me anything about a good cause or anything, because I would have absolutely opted for that option. Then how fearful I was. 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

them to get that information. Those who were missing information and needed to get back into compliance tended to describe a fairly easy process of getting back into compliance once they provided the needed information.

Impact of the Cooperation Requirement on the Decision to Apply for Benefits

Most participants in Michigan still decided to apply after learning about the cooperation requirement because they needed the benefits for their families.

- Some explained that learning about the cooperation requirement had no impact on their decision to apply because they were already planning to open a child support case. In these cases, the cooperation requirement was beneficial because the agency did most of the work to set up the child support case.
- A few participants shared that the cooperation requirement did not impact their decision to apply for SNAP because they did not realize that sharing information on the noncustodial parent could lead to a child support case being opened on their behalf. One such participant noted that the application did not make it clear how the information on the application would be used.



"I was already thinking about opening [a child support case] up, but I never did do it on my own. And when I came, I didn't do on my own. They took all the paperwork; they did all that legal stuff. The department of human service did. And that means I don't have to go get no attorney."

—Custodial parent





Chapter 6 State Profile: Mississippi

The SNAP cooperation requirement has been in place in Mississippi since 1996. To document and understand the State’s cooperation requirement implementation experience, the study team interviewed State and local program leaders from SNAP and child support, frontline staff from two local SNAP offices, and frontline staff from two local child support offices (Greenville and Philadelphia). In all, the study team conducted eight interviews with SNAP staff members and 13 interviews with child support staff members in August 2022. To document and understand the State’s cooperation requirement from the perspective of participants, the study team conducted 25 in-person and virtual interviews with SNAP participants from Washington County between November 2022 and February 2023.

6.1. SNAP and Child Support Program Context

The child support program and SNAP are both housed within the Mississippi Department of Human Services (MDHS). MDHS also administers TANF, subsidized child care, and many other programs for individuals and families with low income. Both SNAP and TANF, along with other assistance programs, are administered by the Division of Economic Assistance. The child support program is administered by the MDHS Division of Child Support.

Exhibit 6.1. Mississippi SNAP and Child Support: Administrative structure and caseload size

 SNAP	SNAP agency	Department of Human Services, Division of Economic Assistance
	SNAP administration	State administered
	Number of SNAP households in FY 2022	208,130 ^a
 Child support	Child support agency	Department of Human Services, Division of Child Support
	Child support administration	State administered and operated by contracted private vendor
	Number of open child support cases in FY 2022	241,979 ^b

^a U.S. Department of Agriculture (2023).

^b Office of Child Support Services (2023).

The SNAP program has 85 offices spread across the State’s 82 counties. Individuals may apply for assistance, including SNAP, in-person at a county office or online.










The MDHS Division of Child Support is responsible for setting policy, ensuring compliance with federal regulations, operating and maintaining the State child support data system, and operating the Central Registry Unit. MDHS contracts with YoungWilliams to deliver child support services across the state. YoungWilliams staff manage regional child support offices and are responsible for opening child support cases, including answering calls from customers, handling referrals from assistance programs for individuals subject to the cooperation requirements, and

providing certain types of enforcement services, such as license suspensions. YoungWilliams also employs attorneys who handle legal child support matters, such as order establishment, order modifications, and contempt filings. Mississippi uses judicial procedures for establishing paternity and child support orders and both administrative and judicial procedures for enforcement. Individuals may apply for child support services at one of the 28 regional offices or by submitting a paper application through the mail. In addition to the State child support data system, YoungWilliams uses its own task-based case management system to assign cases from a central location and track their status.

6.2. Cooperation Requirement Process in Mississippi

The child support program and SNAP must coordinate and share information in order to implement the cooperation requirement. Exhibit 6.2 summarizes the key steps involved in that process for Mississippi.

Exhibit 6.2. Overview of child support cooperation requirement process in Mississippi

	Households with children headed by custodial parents are subject to the child support cooperation requirement. ^a Initiation of the cooperation requirement process begins when a parent applies for or is recertified for SNAP benefits.
	SNAP workers explain the cooperation requirement to the individual and collect information about the other parent. SNAP workers also check the SNAP system to see if a cooperation status already exists for the applicant—for example, the applicant has been determined to be in cooperation by a different program, such as TANF, that has a cooperation requirement
	If all eligibility requirements are met and there is no pre-existing cooperation determination, the SNAP case will be opened for the household while the individual responds to child support requests necessary to open and work their child support case. If the individual has a pre-existing determination of noncooperation, the applicant will be instructed to work with child support to come into cooperation within 10 days before their SNAP household benefit is recalculated.
	The referral to child support occurs automatically through the integrated data system. Child support staff receive a notification of a new referral from SNAP.
	Once child support determines eligibility for child support services, a worker begins working with the household to open a child support case.
	Child support determines if an individual has cooperated with their efforts to establish a child support case within 21 days.
	The cooperation status is updated in the State child support data system and is automatically transferred to the SNAP data system through a nightly automated process.
	If the individual is cooperating, the household will receive their full SNAP benefit amount.
	If the individual is not cooperating, the individual receives a letter informing them that their case will be closed after 60 days. The case will then be closed if the individual does not respond to the notice within the 60 days.

^a The legislation mandating the SNAP cooperation requirement says that both custodial parents and noncustodial parents are required to cooperate with child support. However, interviews with SNAP staff suggested that the policy is not being actively implemented for noncustodial parents.

6.3. Cooperation Requirement: Motivation, Planning, and Implementation

Motivation

The cooperation requirement in SNAP has been in place in Mississippi since 1996, after the passage of the Personal Responsibility and Work Opportunity Reconciliation Act, which gave States the option to require child support cooperation as a condition of receiving SNAP benefits. Because the requirement has been in place for such a long period of time, none of the staff interviewed for this study were able to provide context for the decision in the State to implement a cooperation requirement for SNAP.³ The MDHS policy manual describes the purpose of the SNAP cooperation requirement as ensuring children have legal parentage established and are financially supported by both parents (Mississippi Department of Human Services, 2020).

The Mississippi legislation authorizing the establishment of a cooperation requirement in SNAP required custodial and noncustodial parents to cooperate with child support (Mississippi Department of Human Services, 2023). In practice, SNAP staff do not frequently refer noncustodial parent heads of household to child support. According to some staff, noncustodial parents would only be referred in cases where paternity had not been established for a child in their SNAP household. Overall, interviews with staff suggested that the interpretation of this policy—how it should be applied to noncustodial parents and under what circumstances—varied considerably.

Exhibit 6.3. Characteristics of Mississippi SNAP households subject to the cooperation requirement

SNAP and child support administrative records provide information about the experience of custodial parent SNAP households who were subject to the cooperation requirement. Although these data provide a useful snapshot of the characteristics and outcomes of those subject to the requirement, they do not represent the causal effects of the requirement. This is because they are likely affected by a variety of policy, demographic, and economic circumstances other than the requirement.

- 25 percent of SNAP households were subject to the cooperation requirement.
- Less than 1 percent of SNAP households did not cooperate with the requirement.
- The median age of the custodial parent head of household was 34 years old.
- Over 97 percent of custodial parent SNAP households were headed by women.
- The average child support order amount across orders for these households was \$288; however, on average, custodial parents received about \$161 across orders.

For more findings from this analysis, see Main Report, Chapter 3. ▲

³ No staff interviewed were in their roles in 1996. Therefore, the study did not collect any information on the planning and rollout of the cooperation requirement in Mississippi.

Implementation Facilitators

Integrated data systems and targeted resources for child support staff supported implementation of the cooperation requirement in Mississippi.

Data System Features Enhance Implementation

- The Mississippi SNAP and State child support data systems have automated interface processes that facilitate information sharing between the two agencies. SNAP cases that are subject to the cooperation requirement are referred to child support through an automated nightly process whereby information about SNAP households is transferred to the child support agency.
- A nightly automated process is also used to transfer information about cooperation status from the State child support agency data system to the Mississippi SNAP agency data system.
- Child support staff emphasized the importance of their case management system, which was developed, is owned, and is operated by YoungWilliams, the vendor that operates the child support program in Mississippi. The case management system is separate from the State child support data system. Instead of managing a caseload based on geographic office locations, YoungWilliams' case management system assigns cases to child support staff using automated task queues. One YoungWilliams staff member said that their case management system, including the automated task queues, was necessary to efficiently handle the child support agency's large caseload. The case management system also helps staff manage the large volume of cases efficiently by sending reminders to staff about tasks that need to be completed so that cases that need review are not neglected. The child support case management system is integrated into the child support agency's data system that interfaces with the SNAP agency data system.

Policy Training and Resources Strengthen Child Support Implementation

- During interviews, child support staff described helpful training and updates to the child support policy manual that caseworkers received. These resources were intended to improve workers' ability to explain the technical details of the cooperation requirement and help them convey to participants why they need to cooperate with child support.
- Training and policy manual content was also focused on strengthening child support workers' ability to discuss family violence and good cause exemptions. Staff who were interviewed expressed that training on good cause exemptions improved their understanding of why good cause exemptions are important and how they should be implemented.

Implementation Barriers

Both child support and SNAP staff reported experiencing challenges in implementing the cooperation requirement related to data systems, communication, caseload size, and resources.

Limited and Inaccurate Exchange of Data Can Cause Delays in Case Processing

- Despite the automated interfacing features of the SNAP and child support data systems, the data systems also posed barriers to implementation. Both agencies operate legacy data systems, and the information they exchange is limited. Staff described that the limitations of the data systems sometimes posed challenges for them and caused delays in cases moving forward. To address this, the State had recently announced a multiyear initiative to transition to a modernized, unified data system that will support multiple assistance programs, including SNAP and child support.
- Mississippi child support staff reported receiving inappropriate referrals. These inappropriate referrals create additional work for child support caseworkers. For example, child support staff described receiving referrals for households where both parents were living in the house, referrals with the incorrect children listed, referrals with incorrect or incomplete information, and referrals for individuals who were no longer receiving SNAP. When child support staff receive invalid referrals, they must contact SNAP staff, and staff from the two divisions work together to investigate the referral and close it. This process takes time and creates added work for both sides, especially for newer staff members.

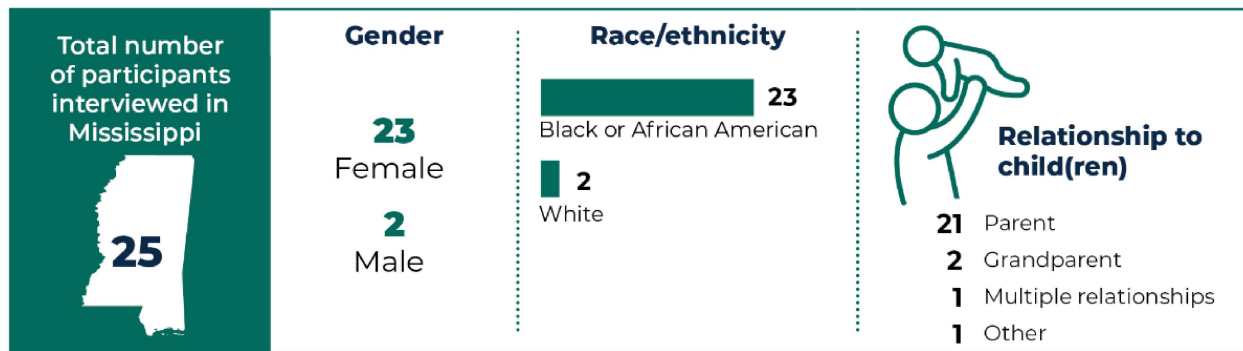
Having a Third-Party Provider of Child Support Services Can Create Communication Challenges

- Staff expressed that the privatization of child support has contributed to communication barriers between the child support program and the Economic Assistance division that operates SNAP. Prior to privatization of the child support program, the child support and Economic Assistance divisions shared office space, and workers knew each other. Workers from the different divisions could ask questions or have discussions in-person, call each other's direct telephone numbers, or send emails directly to a specific staff person. Workers reported that this facilitated quick resolution of issues. Under the privatized child support system, child support and SNAP workers are housed in different locations. During site visit interviews, SNAP workers described having to call the child support program's general call center to speak with child support staff, which made it more time consuming and difficult to discuss cases and resolve issues.

6.4. Participant Views and Experiences with the Cooperation Requirement in Mississippi

Exhibit 6.4 provides an overview of the participants who were interviewed in Mississippi, including their gender, race and ethnicity, and reported relationship to the children in their household.

Exhibit 6.4. Characteristics of in-depth interview participants in Mississippi



Participant Perceptions of the Cooperation Requirement

A few participant respondents supported the cooperation requirement as implemented in Mississippi. These participants typically cited their appreciation for the SNAP benefits and the additional money that child support offered their families or believed the requirement helped promote parental accountability.

“I think it’s a great attempt to keep somebody that should be wanting to do this anyway. But keeping them focused on what they need to do, to take care of their responsibility.”
—Custodial parent

However, many participants indicated that they did not support it or had mixed feelings about it for various reasons.

- Several participants believed that the cooperation requirement should not apply to all situations or there should be additional exemptions for parents who are involved in the child’s life. For example, one grandparent who was the custodial parent of their grandchild was resistant to opening a child support case on their daughter because she was already providing what she could for her son; however, the grandparent ultimately had to cooperate in order to receive SNAP.

“I guess because a lot of people don’t do anything for their kids, but she’s a really good mom. She takes care of him. Whatever he needs, she buys it so it’s kind of crazy. Why would I put child support on her?”
—Family caregiver

- A few participants noted that the cooperation requirement creates too much work for those who are subject to it, explaining that the amount of paperwork or the repetitiveness of the recertification process was cumbersome. Several described it as feeling like a “punishment” for the parents that are involved in their children’s lives because they had to do so much to stay in cooperation.

“It is so overbearing, you got to do this every time...too many questions.... The paper too thick. Why you all got all this paperwork?... And now if you put it all together it’s saying the same questions over and over again.”
—Custodial parent with multiple relationships to children in household

- Others noted that although they did a lot to fulfill the requirement, they received limited financial benefits in return because they received little or no child support payments. These participants did not believe the child support cooperation requirement was effective for them. Even those who didn't mind complying indicated that it was frustrating and that they didn't see any benefit of cooperating.
- A few participants in Mississippi did not think it was fair that they had to become involved in the child support program just because they need assistance with food. Several participants noted a difference between SNAP and other benefits programs with cooperation requirements because SNAP can only be used to buy food.

Participant Experiences with the Cooperation Requirement

Knowledge of the Cooperation Requirement

Most participants found out about the cooperation requirement at the time of their application, through filling out paperwork or conversations with their caseworker. Many also reported knowing about the cooperation requirement before they applied for SNAP

and had learned about it through friends, family, or other members of their community who had been subject to it over the years. Despite knowing about the requirement, many participants described feeling confused by aspects of the child support cooperation process in Mississippi because of the communication they received or did not receive about the requirement.

A few respondents in Mississippi indicated that their experience was largely dependent on the caseworkers with whom they interacted. For example, one participant described having a "caring" caseworker, noting how it improved their overall experience with the cooperation requirement. Another described how staff were "really helpful" throughout the process.



"I think staff was really helpful because, they explained everything good and they let me know the pros versus the cons."

—Custodial parent



"I don't like when I have a meeting or something with them, they be saying all them big words. I don't understand all this stuff."

—Custodial parent

Implementation Challenges Related to Cooperation

Several participants also raised issues with the types of information they had to provide to maintain their cooperation status. Participants thought it was overly personal or did not understand why they had to provide someone else's personal information, expressing that it was often difficult to get the information that they needed from the other parent. Others didn't appreciate how their benefits were dependent on them having information about someone else with whom, in many instances, they did not have regular contact.

A few participants cited accessibility concerns that made getting to their SNAP and child support appointments challenging. For example, some participants described having to take time off work to attend meetings, which negatively impacted their financial situation. Others discussed challenges related to transportation in their area of Mississippi that made it difficult for them to get to and from the SNAP and child support offices.

“I don’t even have a ride and the child support office, at first, it was way out. We don’t have buses...some people don’t have a ride.... So that was kind of messed up when I first got here, to try and get on my feet plus try to get to this appointment.”
—Custodial parent

For example, one participant described the additional burden placed on them by having to attend an additional appointment at the child support office to stay in cooperation.

Sanctions and Good Cause Exemptions

Several participants in Mississippi had experienced a reduction in benefits that they attributed to the cooperation requirement. A few could point to the reason they received a sanction, including missed appointments, missing information about the other parent, or purposeful noncooperation. For example, one participant who was the custodial parent of their sister’s child received a sanction for not cooperating, after choosing not to cooperate because they believed that pursuing child support would hurt their sister. Others had difficulty understanding why they had received a sanction because, as they explained, they had done everything they could to cooperate. Even so, the communication they received notifying them of the sanction didn’t clearly explain why their benefit amount had been reduced.

“You already basically know that you have to cooperate. They don’t actually say in the interview, ‘Cooperate or we’ll do this or we’ll do that.’ There are certain things that you learn as you go and if you can’t make this appointment and you don’t call in then you find out...they say, ‘You missed this appointment so your case will be closed or you’ll be sanctioned.’”
—Custodial parent

Exhibit 6.5. Participant experiences with sanctions and knowledge of good cause



Although the child support application includes a notice of right to claim good cause for not cooperating, most participants in Mississippi reported that they had never been informed about the good cause exemption policy. A few said that they wished they had been informed about good cause exemptions because they might have pursued the option.



"I was never given a list of [good cause circumstances]. That was never ever introduced into any conversation. All I know it is required. I don't know if there are any special circumstances."

—Custodial parent

Impact of the Cooperation Requirement on the Decision to Apply for Benefits

Many participants said that the cooperation requirement did not change their decision to apply for SNAP benefits. Several were not fazed by having to cooperate with child support or felt "alright" about doing so. One participant said that it was something she had planned to do on her own but didn't get around to until she applied for SNAP and was subject to the cooperation requirement. Some who were apprehensive about cooperating said that they would probably still make the same decision because they needed the benefits provided by SNAP. A few suggested they might have reacted differently by asking more questions or not applying at all and finding other ways to make ends meet that did not require them to cooperate with child support.



"I'm gonna apply, because if I'm qualified for it, why not get it?.... It's putting food in my kid's mouth.... If I don't apply, I'll be depending on him to do something for the kids, right? And if I apply, that's guaranteed.... That means he's gonna pay his child support and I'm gonna get my food stamps [SNAP] and Medicaid. I'm gonna get everything that you all have to offer me by me applying for child support."

—Custodial parent

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Chapter 7 State Profile: Ohio

Ohio does not have a child support cooperation requirement for SNAP. However, in 2018, 2019, and 2021, there was State legislative interest in exercising this option. To understand the State’s experience with considering but ultimately not adopting a cooperation requirement in SNAP, the study team interviewed State-level child support and SNAP staff in November 2022. In all, the study team interviewed nine SNAP staff and six child support staff. The study also conducted 25 in-person and virtual interviews with SNAP participants from Licking and Fairfield Counties in May 2023. Most of the interviews were conducted with custodial parents. Since a cooperation requirement does not currently exist in Ohio, we asked SNAP participants to share their opinions about cooperation requirements in general.

7.1. SNAP and Child Support Program Context

Ohio’s child support program and SNAP are supervised by the State’s Department of Job and Family Services (DJFS) and administered through each County Department of Job and Family Services (CDJFS) and Child Support Enforcement Agency (CSEA), respectively. DJFS also administers the Temporary Assistance for Needy Families (TANF) program and the subsidized child care program, along with other assistance programs for low-income families. At the local level, counties vary as to whether an applicant’s eligibility for multiple public assistance programs is determined by one worker or whether SNAP eligibility is determined separately from other assistance programs. Counties also vary as to whether the assistance programs and child support programs are co-located or have stand-alone offices. Parentage and child support orders can be established administratively by child support workers or judicially by a Domestic Relations, Juvenile, or Family Court.

Exhibit 7.1. Ohio SNAP and Child Support: Administrative structure and caseload size

 SNAP	SNAP agency	Ohio Department of Job and Family Services
	SNAP administration	County administered
	Number of SNAP households in FY 2022	755,836 ^a
 Child support	Child support agency	Ohio Department of Job and Family Services
	Child support administration	County administered
	Number of open child support cases in FY 2022	745,305 ^b

^a U.S. Department of Agriculture (2023).

^b Office of Child Support Services (2023).

7.2. Cooperation Requirement: Motivation, Planning, and Implementation Considerations

Motivation

Legislators introduced three bills in the last five years to require child support cooperation for SNAP participants, twice through legislation introduced in the House and once introduced in the Senate. The language of the bills amended the current code for SNAP eligibility to include a provision that “certain individuals, as a condition of eligibility for supplemental nutrition assistance program benefits, must cooperate with the department regarding establishing paternity and establishing, modifying, and enforcing a child support order.” (OH H.B. 608., OH H.B. 200, OH S.B. 17)

In 2019 and 2021, documented testimony was provided by proponents for the legislative change as well as interested parties expressing concerns with the legislation. Proponents of the bill noted that the requirement would increase financial support available to families with low incomes and hold parents accountable for the well-being of their children. Representatives from the Ohio DJFS Director’s Association, the Ohio CSEA Directors’ Association, and the County Commissioners Association of Ohio provided testimony that implementing the cooperation requirement would increase workloads for SNAP and child support staff and require expensive data system updates to facilitate implementation (Ohio House Health Committee H.B. 200 Interested Party Testimony).

None of the cooperation requirement bills advanced in the legislative sessions, and there have been no subsequent legislative attempts since 2021 to adopt the requirement.

Exhibit 7.2. Characteristics of Ohio SNAP households that could be subject to the cooperation requirement

To assess characteristics of SNAP households that might be affected by the hypothetical implementation of the cooperation requirement, the study examined administrative records for single-parent SNAP households with children as a proxy for custodial parents who could be subject to the cooperation requirement. This proxy includes some SNAP households that may not be affected by a cooperation requirement, because some single-parent SNAP households with children would likely not require child support orders.

- 29 percent of SNAP households were made up of single-parent households with children. 59 percent of these households reported child support payments, receipts, or deductions of child support payments.
- The median age of the head of single-parent households with children was 34 years old and 94 percent of these households were headed by women.

For more information about findings from this analysis, see Main Report, Chapter 3. ▲

Planning and Implementation Considerations

As part of the legislative efforts in 2019, the Ohio Legislative Service Commission provided a fiscal note and an impact cost estimate. The impact cost estimate found that updating the child support system to enable implementation would cost \$3 to 5 million. The impact estimate did not estimate any other administrative costs. Additionally, representatives from the SNAP and child support agency submitted their own testimony about the potential impacts of the cooperation requirement on SNAP and child support operations (H.B. 200 fiscal note and local impact statement).

- **Policy specification and development of procedures.** The vague language in the legislation left DJFS with many considerations for how it would implement the cooperation requirement. Leaders initially expected that the policy would align with the TANF cooperation requirement, meaning only custodial parents would be required to cooperate as a condition of eligibility, and sanctions would only apply to the noncooperating adult.

Conversations later shifted to requiring noncustodial parents who received SNAP benefits to also cooperate with the child support program, which did not align with current practices or systems for the State's other benefits programs. Leaders explained that defining cooperation for noncustodial parents in a way that aligned with current child support policies and statutes would be a time-intensive task. New policies, procedures, and coding systems that could track noncustodial parents would be needed to apply the cooperation requirement to noncustodial parents. Whether the policy would have included both custodial and noncustodial parents remained unclear, and no plans for rolling out the policy were developed.

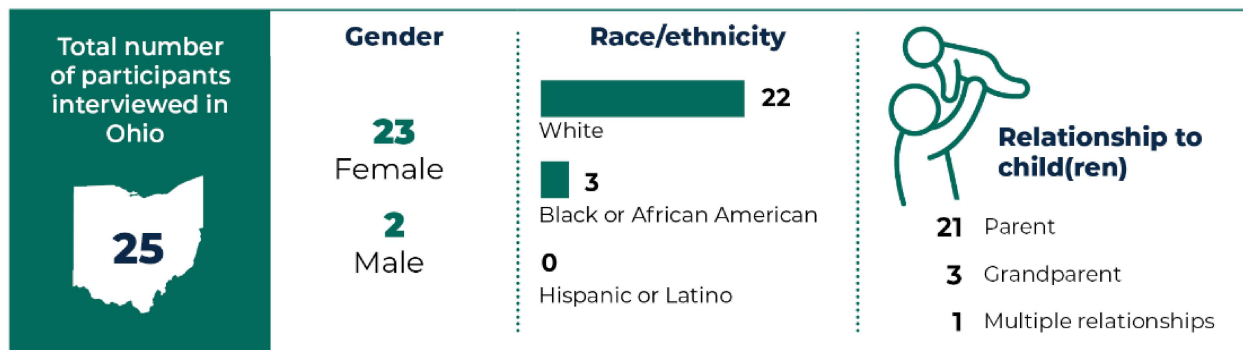
- **Automated data system modifications and costs.** Staff anticipated significant information technology (IT) costs associated with ensuring that the State's automated systems were equipped to implement the policy and maintain a smooth interface between the child support and SNAP systems. The current IT infrastructure of both the SNAP and child support systems would require a systems-wide update to accommodate tracking and communicating between the Ohio SNAP and child support programs. In particular, the child support data system is over 20 years old and operates on a mainframe system. Making updates to the data systems for interfacing could take years and, in the meantime, counties would have to rely on manual processes for making referrals and updates to cooperation status. Efforts to update the data systems would be even more challenging if the requirement were applied to noncustodial parents, for which neither system had the ability for matching data. It was estimated that updating the data systems to support implementation would take approximately 24 months of planning and cost \$3 million to \$5 million for development and implementation.
- **Increased child support caseload and staff training.** Staff anticipated that the increase in child support referrals and case openings from a cooperation requirement would create significant administrative costs and workload burden. In testimony to the House Health Committee in 2019, the executive director of the Ohio CSEA Directors' Association estimated

that the cooperation requirement would result in an influx of 100,000 more children in the child support caseload. Staff anticipated that this increase in caseloads would necessitate additional staff and subsequent training on new systems and procedures. Operationalizing the policy would require staff to undergo training on the updated system and new policies and procedures. Staff across both programs would require training on how noncooperation would be defined, how to implement the policy consistently, and how to communicate case status updates across systems.

7.3. Participant Views on the Cooperation Requirement in Ohio

Exhibit 7.3 provides an overview of the participants who were interviewed in Ohio, including their gender, race and ethnicity, and reported relationship to the children in their household.

Exhibit 7.3. Characteristics of in-depth interview participants in Ohio



Participant Perceptions of the Cooperation Requirement

Interview participants' views on a hypothetical cooperation requirement in Ohio were mixed. About half of the participants supported the idea of a cooperation requirement in certain situations, while the other half shared negative sentiments about a hypothetical SNAP cooperation requirement.



"I feel like it's a good thing for people that need help getting the other party to participate or be responsible for their child. It's a good thing for them to have a good resource if they're having an uncooperative parent."

—Custodial parent

In general, participants who expressed support for cooperation requirements believed they were a helpful resource to families in need while also encouraging noncustodial parents to be accountable and provide financially for their children.

Some participants noted the complexity of the issue and thought a cooperation requirement in SNAP would only be helpful in certain situations. The intent of the policy, how it was implemented, and how it accounted for individuals' different circumstances would impact whether they supported it. Some participants reflected on cases in which it might not work as

well for some families. For example, the requirement may not help families where the other parent is already providing adequate support outside of the formal child support system. Others highlighted the importance of having the formal child support system available as an option to custodial parents, but they emphasized that parents should be able to choose if and when they engage with the formal system. About half of participants did not support a hypothetical cooperation requirement under any circumstance, citing concerns that engaging with noncustodial parents could result in threats of violence or the noncustodial parent withdrawing their existing, informal support.



"I think that one's a catch-22, because it really depends on the situation if they're already providing support—just unofficially. I go back to the not liking the idea of the fees and stuff being taken out of the amount that they're being given. But at the same time, there's a lot of situations where people just are wanting to work the bare minimum and not wanting to support their kids and that's one way that they would actually be forced to. So, I think on that one, it depends on the exact situation how I would feel on it."

—Custodial parent

Participant Areas of Concern or Confusion

Interview participants expressed concerns about what a cooperation requirement in SNAP would mean for them, their relationship with the other parent, and their families.

Some participants shared that they would be apprehensive to engage the other parent in their lives if a cooperation requirement were put in place. One respondent worried that her child's noncustodial parent would ask for visitation rights if she opened a child support case. Another participant shared concerns that even if there were good cause exemptions made for cases of domestic violence, it would be burdensome for a parent to prove they had good cause. A few participants expressed concern that opening a child support case would put them at risk of losing full custody of their child.



"I've known some people in other states that do require that [who] have been in really bad situations because they don't know contact information for the other parent, which that's another thing with me and [noncustodial parent] as well. I don't have any contact information to give over for cooperation with child support in order to be able to get those benefits."

—Custodial parent

Participants also raised issues with the extra work that would be required to receive benefits, such as paternity testing and having to engage with the county child support system. One respondent described difficulties with arranging child care on days that she was scheduled to be at court to open a child support case for one of her children. This respondent felt that the amount of time and money she spent opening the child support case outweighed the payments she received from the noncustodial parent.

Others were concerned about being negatively impacted by the cooperation requirement because they had limited information about the other parent. A few participants had heard

stories about people who lost their benefits because they did not know enough information about the noncustodial parent to stay in compliance.

Potential Impact of Cooperation Requirement on Decision to Apply for Benefits

A few respondents felt that the requirement would not affect their decision to apply for SNAP benefits and would not be burdensome for them because they already had experience with cooperation requirements from other public assistance programs. These respondents felt that a SNAP cooperation requirement was “not a big deal,” because most were familiar with the process from Medicaid or TANF.



“I think there should be exemptions [for] women who are coming from domestic violence or if the other parent is unfit, addicted to drugs, or whatever. I think there should be that. Where you have to have proof or something. I think they should, for full context ... because.... sometimes people are toxic together but individually, they're great people and great parents.”

—Noncustodial parent

However, some of the respondents who expressed concerns also indicated that they would stop participating in SNAP if a cooperation requirement was put into place in Ohio. Two respondents shared that they had stopped participating in other public assistance programs because cooperating with child support was too burdensome.

Participants who shared concerns about what a cooperation requirement would mean for them often cited that such a policy needed to include exemptions. Some spoke more generally about the importance of having exemptions for certain circumstances. Possible exemptions suggested by participants included cases when the other parent was unfit (for example, because of drug use) and when there were domestic violence or safety concerns.



“They have a habit of telling you: you need to come in this day. I don't care if you take off of work and then they make you sit there for four hours, and nothing gets done.... I have to go every 90 days to fill out something for food stamps [SNAP].... They make me drive halfway into the county every two weeks just to turn in paperwork. And if I don't, I lose something.”



—Custodial parent

Tennessee does not have a child support cooperation requirement for SNAP. However, in 2019, there was State legislative interest in exercising this option. 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. To understand the State’s experience with considering but ultimately not adopting a cooperation requirement in SNAP, the study team interviewed State-level child support and SNAP staff in August and September 2022. In all, the study team interviewed eight SNAP staff and seven child support staff. The study team also conducted 27 in-person and virtual interviews with SNAP participants in the Nashville area from October 2022 through April 2023. Most of the interviews were conducted with custodial parents. Since a cooperation requirement does not currently exist in Tennessee, we asked SNAP participants to share their opinions about cooperation requirements in general.

8.1. SNAP and Child Support Program Context

Tennessee’s child support program and SNAP are administered by the State’s Department of Human Services (DHS), which oversees the administration of the TANF program and subsidized child care, along with other assistance programs for families with low incomes. Child support services are provided through local district attorneys, DHS staff, and private agencies under contract with the State.

Exhibit 8.1. Tennessee SNAP and Child Support: Administrative structure and caseload size

 SNAP	SNAP agency	Department of Human Services, Family Assistance Office
	SNAP administration	State administered
	Number of SNAP households in FY 2022	417,783 ^a
 Child support	Child support agency	Department of Human Services
	Child support administration	Child support services are provided through local district attorneys, DHS staff, and private agencies under contract with the State
	Number of open child support cases in FY 2022	310,997 ^b

^a U.S. Department of Agriculture (2023).

^b Office of Child Support Services (2023).

8.2. Cooperation Requirement: Motivation, Planning, and Implementation Considerations

Motivation

Legislators introduced a bill in Tennessee in 2019 (HB 277–SB 549) to require child support cooperation for SNAP participants. In response, the DHS and the Family Assistance Office developed a fiscal note with estimates of the potential financial impact of the proposed bill on staffing, caseloads, IT system updates, and other costs. DHS estimated that the cooperation requirement would result in an increase in State expenditures (\$157,900 one-time expenditure and \$6,382,000 recurring expenditures) and an increase in Federal expenditures (\$237,200 one-time expenditure and \$7,884,100 recurring expenditures⁴). The cooperation requirement bill did not advance in the legislative session, and there have been no subsequent legislative attempts to adopt the requirement.

Exhibit 8.2. Characteristics of Tennessee SNAP households that could be subject to the cooperation requirement

To assess characteristics of SNAP households that might be affected by the hypothetical implementation of the cooperation requirement, the study examined administrative records for single-parent SNAP households with children as a proxy for custodial parents who could be subject to the cooperation requirement. This proxy includes some SNAP households that might not be affected by a cooperation requirement, because not all single-parent SNAP households with children likely require child support orders.

- 32 percent of SNAP households were made up of single-parent households with children. 28 percent of these households reported child support payment, receipt, or deduction of child support payments.
- The median age of the head of single-parent households with children was 34 years old and 93 percent of these households were headed by women.

For more information about findings from this analysis, see Main Report, Chapter 3. ▲

Planning and Implementation Considerations

The emergence of legislative interest in adopting a cooperation requirement in SNAP prompted child support and SNAP staff and others within DHS to begin identifying, on a preliminary basis, key planning and implementation considerations and concerns, such as the following:⁵

- **Policy specification and development of procedures.** In the absence of any specific legislative direction or provisions, DHS planned to convert the brief legislative language into operational policy—for example, determining who was subject to the cooperation requirement and the process for determining compliance with the policy, penalties for noncooperation, and good cause exemptions. In general, staff anticipated that they would adapt and align the cooperation requirement to policies already in place in the TANF program.

⁴ HB 277–SB 549 Fiscal Note for the Tennessee General Assembly Fiscal Review Committee, March 14, 2019.

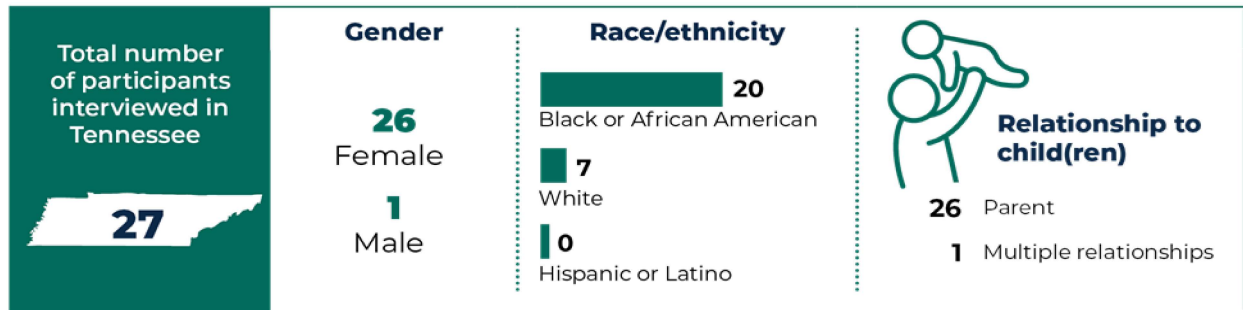
⁵ DHS also issued a Request for Information to potentially procure a study of the broader implications of the legislation but decided not to go forward with procurement after learning that the Food and Nutrition Service was undertaking this study.

- **Automated data system modifications and costs.** Staff anticipated significant IT costs to ensure the State’s child support and SNAP systems were equipped to implement the policy and interface smoothly. These technology costs were reportedly especially worrisome to staff. Although the existing child support system was equipped to process TANF referrals, this policy change would have required extensive new code development to ensure that the system could distinguish SNAP referrals from TANF referrals. If noncustodial parents (in addition to custodial parents) were subject to the cooperation requirement, the automated system modifications would be more extensive and costs would be higher because the current systems cannot identify whether a SNAP recipient is a noncustodial parent.
- **Increased child support caseload and administrative burden.** Staff anticipated the increase in child support referrals and case openings resulting from the cooperation requirement would create significant administrative costs and workload burden for the child support agency. In particular, State child support agency staff worried that the cooperation requirement would increase the number of parents referred to the child support agency who did not want their services. They felt these time-intensive, hard-to-work cases would require additional staff resources but would not increase collections. Staff also anticipated that court representatives who handled child support matters in Tennessee’s primarily judicial child support system would express similar concerns about workload; it was noted that the courts had already expressed concerns about the child support cooperation requirement for Medicaid because these cases were time-consuming and often resulted in little or no child support collections.
- **Other cost considerations.** DHS anticipated there would be extensive initial and ongoing costs to implement the cooperation requirement. In addition to implementation costs for system modifications, up-front costs would likely include added staff time to develop policy and procedures, train staff on the new policy, and conduct outreach efforts to communicate the policy change to the community. In addition, the rollout would require extensive coordination with the multiple contracted entities operating local child support offices. Moreover, staff noted additional costs associated with managing the increase in caseload due to newly referred cases from SNAP, which has a caseload that is significantly larger than the TANF caseload.
- **Concerns about the impact of the requirement on families and program participation.** SNAP and child support leaders identified a variety of concerns about the potential impact that such a requirement could have on the families they serve. State agency SNAP staff expressed concerns that the cooperation requirement could deter otherwise eligible and needy families from participating in SNAP—either because they simply did not want to cooperate or because they did not understand how it would affect them or their family. There was also concern that introducing a SNAP cooperation requirement would negatively impact community perceptions about the child support and SNAP programs.

8.3. Participant Views on the Cooperation Requirement in Tennessee

Exhibit 8.3 provides an overview of the participants who were interviewed in Tennessee, including their gender, race and ethnicity, and reported relationship to the children in their household.

Exhibit 8.3. Characteristics of in-depth interview participants in Tennessee



Participant Perceptions of the Cooperation Requirement

In-depth interview participants' reactions to a hypothetical SNAP cooperation requirement in Tennessee were mixed. Some participants supported the idea, while most did not support it or were undecided about whether they would support it or not.

- Some participants supported the idea of a SNAP cooperation requirement as an approach to increase accountability and financial support for families. For example, a participant noted that they are currently not receiving child support payments from their child's noncustodial parent and suggested that a cooperation requirement might lead to better enforcement of these payments.
- Most participants did not support the requirement or indicated that their support for it would be dependent on the family's circumstances, citing examples of why a cooperation requirement would raise problematic issues for their own families. For example, one participant said their children's noncustodial parent was already informally supporting their children, so it would be unfair to open a child support case against them. They argued that doing so might negatively impact their relationship with the noncustodial parent and the noncustodial parent's relationship with their children. Another participant echoed this concern by sharing that their relationship with the noncustodial parent is already strained due to the cooperation requirement for TANF, saying, "our relationship wouldn't be so strained if child support wasn't involved."

- Several participants had mixed views about a cooperation requirement in SNAP. These participants believed that a cooperation requirement would be helpful in certain situations, but overall felt that a mandatory cooperation requirement would create additional work and stress for parents trying to provide for their families. These participants felt that some noncustodial parents would do the right thing in this situation and accept their duty to provide child support but that others wouldn't, making the application and cooperation process more difficult for a family in need of SNAP. A few participants believed that cooperation should be optional depending on the family circumstances; for example, in cases where the other parent is incarcerated or unemployed or instances where the two parents already have an informal arrangement for supporting their children.

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"I don't think that's fair. Because if he [is] participating, buying clothes...being here whenever I need him, and I only really need assistance with food—which, sometimes, people just need the food stamps [SNAP], they don't really need cash assistance for their child because they have an active father. So, I don't think it would be fair for me to apply for food stamps [SNAP] and be told, 'Well, in order for you to get food stamps [SNAP], you got to open up a child support.' That's not fair because I didn't ask for it."

—Custodial parent

Participant Areas of Concern or Confusion

Interview participants identified several areas of concern or confusion about a hypothetical cooperation requirement in SNAP, including how it might impact their own families and relationships. Some expressed concern over what would happen to them if they didn't have the required information about the other parent and worried that their benefits would be "affected by whether or not you can reach this person."

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"I think [a cooperation requirement for SNAP] would definitely cause a rift [in] me and baby father number two's relationship, like it did baby father number one. And it makes them become a flight risk.... He does all that he can, so it will definitely stop the support that I receive now if he was responsible for my food stamps [SNAP].... It'll put us in a bind for sure."

—Custodial parent

Others said that a SNAP cooperation requirement would cause problems in their relationship with the other parent, particularly in instances where the other parent is already involved in the child's life or providing informal support. These participants raised concerns about their co-parenting relationships and feared that it would disrupt the arrangements they already have in place outside of the formal child support system.

Potential Impact of Cooperation Requirement on Decision to Apply for Benefits

For some participants, a hypothetical cooperation requirement would not change their decision to apply for SNAP benefits. Others indicated that it would lead them to reconsider applying for benefits, for various reasons.

- When asked, some participants said a cooperation requirement would not change their decision to participate in SNAP. In general, these participants said that they would still apply for SNAP benefits because they did not have issues providing information about the other parent, they were dependent on their SNAP benefits to feed their families and couldn't afford to lose them, or they felt as though it was the other parent's responsibility to help support the children financially.



"[The cooperation requirement for TANF] made me not apply because it wasn't right. We both worked, we both took care of the kids, and then he's taking care of two others. So, to me, it just wasn't right. So, I would opt to not worry about applying for benefits and just work and do what I could do, and he helped do his part. So, I would just not do it, because to me it wasn't worth it."

—Custodial parent

- Others shared that a cooperation requirement would make them reconsider whether to apply for SNAP. These participants explained that the information required to cooperate felt too invasive and personal, or they simply did not have access to the required information about the other parent. Others said they would consider going without SNAP because the cooperation requirement would force them to choose between their SNAP benefits and the informal support provided by the noncustodial parent. One participant shared that they had already decided against applying for TANF benefits due to the requirement for cooperation for TANF and that they would make the same decision for SNAP.
- When reflecting on their experience with cooperation requirements in other programs, a few participants felt that the requirements made sense for TANF but not for SNAP. They reflected on the difference in the type of benefits provided through the two programs, noting that SNAP provides families with food and TANF provides cash payments, which have more flexibility. A few participants felt a child support cooperation requirement would be misaligned with the goals of SNAP, because sanctions for noncooperation would prevent families from having the food they needed.





Chapter 9 State Profile: West Virginia

In West Virginia, SNAP 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 (DHHR) secretary requested that the child support program and SNAP implement the cooperation requirement through an administrative rule change. As of November 2022, West Virginia was planning for implementation of the cooperation requirement for participants. Implementation was expected to begin in early 2024. The study team conducted five interviews with State SNAP leaders and four interviews with State child support leaders in October and November 2022. The study team also conducted 25 in-person and virtual interviews with SNAP participants from Kanawha County in March and April 2023. Most of the interviews were conducted with custodial parents. Since a cooperation requirement in SNAP was only in the planning stage in West Virginia, we asked SNAP participants to share their opinions about cooperation requirements in general.

9.1. SNAP and Child Support Program Context

West Virginia’s child support program and SNAP are administered by DHHR, which also oversees the administration of the TANF program, subsidized child care, Medicaid, and other assistance programs for families with low incomes. SNAP and child support staff are located in local offices in each of the States’ 55 counties. SNAP cases are overseen by eligibility workers who also determine eligibility for other assistance programs. Individuals may apply online for SNAP and child support or in-person at any local office. West Virginia uses both administrative and judicial procedures to establish parentage, establish and modify child support orders, enforce child support orders, and distribute child support collections.

Exhibit 9.1. West Virginia SNAP and Child Support: Administrative structure and caseload size

 SNAP	SNAP agency	Department of Health and Human Resources, Bureau for Family Assistance
	SNAP administration	State administered
	Number of SNAP households in FY 2022	166,851 ^a
 Child support	Child support agency	Department of Health and Human Resources, Bureau for Child Support Enforcement
	Child support administration	State administered
	Number of open child support cases in FY 2022	90,094 ^b








^a U.S. Department of Agriculture (2023).

^b Office of Child Support Services (2023).

9.2. Planned Cooperation Requirement Process in West Virginia

At the time of the site visit, West Virginia had outlined some of the ways the child support program and SNAP would coordinate and share information when implementing the cooperation requirement. Exhibit 9.2 summarizes the key steps involved in that process.

Exhibit 9.2. Overview of planned child support cooperation process in West Virginia

	<p>Households headed by noncustodial parents will be subject to the cooperation requirement. Initiation of the cooperation requirement process will begin when a parent applies for or is recertified for SNAP benefits.</p> <p>Notably, West Virginia is the only State, both in this study and nationwide, which will apply the cooperation requirement only to noncustodial parents. Specifically, the cooperation requirement will apply only to 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.^a Staff anticipate that those who are deemed disabled, unable to work, or in a drug or alcohol treatment program will not be subject to the cooperation requirement.</p>
	<p>SNAP applicants will be screened by eligibility workers during the eligibility interview to determine whether they are subject to the cooperation requirement. This will entail determining whether the noncustodial parent applicant is subject to the ABAWD work requirement.</p> <p>During the eligibility interview, the worker will also explain good cause exemptions. However, specific policy details were still being determined at the time of the site visit.</p>
	<p>The referral to child support will occur through the integrated data system.</p>
	<p>The child support agency will have 14 business days to notify the SNAP agency whether that individual is paying their monthly child support and has been for six consecutive months.</p>
	<p>The SNAP agency will receive a notification through the data system that cooperation status has been updated.</p>
	<p>If the individual is cooperating, the household will receive its full SNAP benefit amount.</p>
	<p>If the individual is not cooperating, the individual will be notified that their portion of the benefit will be removed and the benefit will be recalculated. SNAP participants subject to the ABAWD work requirement are often in one-person SNAP households, and therefore would lose the entirety of their benefit.</p> <p>If, after a noncooperation determination, the parent has made three consecutive payments, child support will notify the SNAP worker through the data system and the SNAP worker will reinstate SNAP benefits for the following month.</p>

^a See <https://www.fns.usda.gov/snap/work-requirements> for more information about ABAWD work requirements.

9.3. Cooperation Requirement: Motivation, Planning, and Implementation Considerations

Motivation

More than one unsuccessful legislative proposal to adopt the cooperation requirement in SNAP preceded West Virginia's decision to implement a child support cooperation requirement in SNAP through an administrative rule change. Though early legislative attempts failed, department leaders recognized growing interest in implementing the option.⁶ They decided to institute the policy through administrative action, recognizing that doing so would provide the department greater control over the specifics of the policy and the planning and implementation process.

The decision to apply cooperation requirements to noncustodial parents was motivated by concern that a cooperation requirement applied to custodial parents could deter them from seeking assistance. Child support staff recalled that many custodial parents declined medical assistance for themselves and their children when child support cooperation was enforced under the Affordable Care Act. Staff were concerned that they would observe the same trend if custodial parents were required to cooperate with child support as a condition of receiving SNAP. Additionally, child support staff described challenges with data matching during the Medicaid expansion and receiving many invalid referrals, such as referrals for families where both parents lived in the home. Staff were concerned that similar challenges would emerge again if the SNAP cooperation requirement affected custodial parents.

Support for applying cooperation requirements to noncustodial parents was not unanimous. Some staff expressed skepticism that taking away SNAP from noncustodial parents would make them more likely to pay child support.

Planning and Rollout

At the time of the site visit, child support and SNAP leaders were working together to specify how the cooperation requirement policy would be implemented and the supports necessary for implementation.

The biggest step in preparing to implement the policy was planning for the development of a new integrated benefits eligibility and child support computer system. Staff explained that their benefits eligibility data system, which included SNAP, and the child support data system were two entirely different data systems. The development of a new, integrated system that would include both child support data and SNAP data had been in progress for several years. Once the new integrated system becomes fully operational, work would commence to link data between

⁶ In February 2018, House Bill 4417 was introduced; it failed in the House Health and Human Resources Committee. Senate Bill 60 was introduced in February 2017, passed the Senate, and failed in the House Judiciary Committee; House Bill 2741 was introduced in March 2017 and failed in the House Government Organization Committee.

the two programs to determine who is paying child support and receiving SNAP. Staff estimated that costs associated with the new integrated child support and eligibility system to facilitate data sharing between agencies could be minor (low \$100,000s) or large (high \$100,000s to \$1 million), depending upon how the system rolls out and the magnitude and complexity of the changes involved. 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.⁷

Before rolling out enforcement of the cooperation requirement, the programs would need to develop a data use agreement (DUA) to allow child support and SNAP to exchange information. Leaders from both programs met to determine data availability and data sharing practices. Before implementation, DHHR also planned to update the SNAP and child support program manuals and train staff. Staff did not expect that they would need to hire additional employees or create additional trainings to support potential caseload increases that could arise once the requirement is implemented if the new data system operates smoothly and allows for an automated alert regarding noncooperation.

Recognizing the need to communicate this new policy to the community, DHHR planned to conduct outreach efforts, including disseminating information about the requirement on the agency's website and social media pages and through posters in local offices.

Exhibit 9.3. West Virginia SNAP households that could be subject to the cooperation requirement

The cooperation requirement in SNAP would apply only to noncustodial parents in West Virginia who are subject to the SNAP work requirement for able-bodied adults without dependents (ABAWD). Though the study team sought to understand how these individuals might be affected by implementation of the cooperation requirement, it is difficult to identify them in SNAP administrative records before implementation of the requirement. SNAP records do not include information on noncustodial parent status or nonresidential children. Adults-only SNAP households are identifiable in SNAP records and likely include some noncustodial parents. However, this group also includes some SNAP households who are not subject to a cooperation requirement because they do not have children. Further, 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 adult-only households as a proxy for noncustodial parents, this profile does not attempt to provide characteristics of SNAP households that might be subject to the requirement in West Virginia.

For more information about findings from this analysis, see Main Report, Chapter 3. ▲

⁷ 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.

Implementation Facilitators

SNAP and child support staff identified factors they believed would be critical for successful implementation of a SNAP cooperation requirement. These included the following:

Good Communication is Expected to Ease Implementation

- Because the two agencies are both under DHHR, they can collaborate and work together more seamlessly than if they were in two different departments. For example, the agencies share an IT department, so staff believe it will not be difficult to create and approve a DUA.

Experience with Other Cooperation Requirements is Expected to Reduce Implementation Challenges

- West Virginia is modeling its SNAP cooperation requirement process after processes for the TANF cooperation requirement. The existing cooperation requirement in TANF means that there is already a referral process in place for child support workers, so program leaders did not believe it would be difficult to train frontline staff on the new policy.

Implementation Barriers

SNAP and child support staff also identified potential roadblocks that could create implementation challenges:

Updated Data System Could Create Challenges

- Some staff believe that the new system may not support implementation if the program data do not interface with each other or are not as automated as staff hope. Additional staff training may be required as staff become familiar with the new data systems.

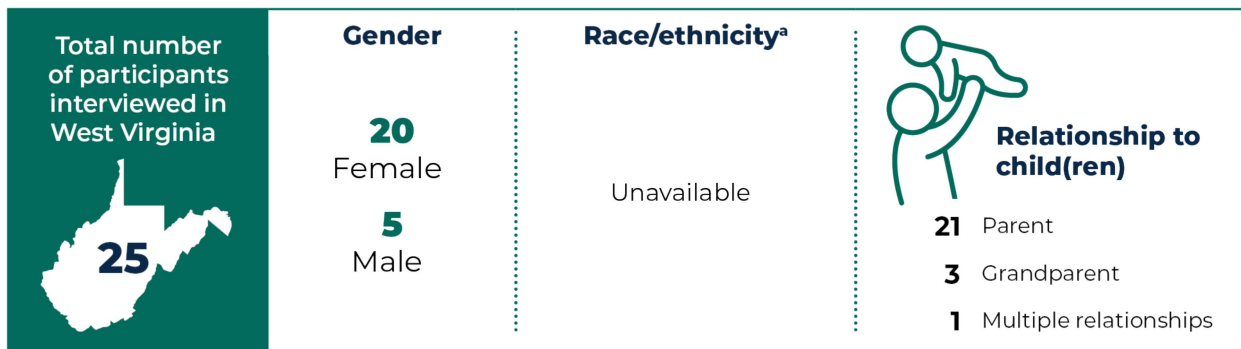
Coordinating Communication and Messaging Across Programs

- SNAP and child support staff have large caseloads. Some staff expressed concerns that additional work on top of already high workloads could inhibit communication across programs.
- Some staff expressed concern that too much discretion in the design of the policy could lead to misunderstandings between SNAP and child support staff about how the requirement should be implemented.
- Other staff worried about effectively communicating the change to SNAP households, noting that it will require substantial education for both the staff and the community.

9.4. Participant Views on the Cooperation Requirement in West Virginia

Exhibit 9.4 provides an overview of the participants who were interviewed in West Virginia, including their gender and reported relationship to the children in their household.

Exhibit 9.4. Characteristics of in-depth interview participants in West Virginia



^a Race and ethnicity are not included because the administrative data received from West Virginia did not include those data elements.

Participant Perceptions of the Cooperation Requirement

Interview participants were asked about their views on a cooperation requirement if it applied to either noncustodial parents or custodial parents. Discussion of their views was not limited to the specific cooperation policy that West Virginia was planning to implement. Participants shared a mix of views about requiring SNAP participants to cooperate with the child support program. About half of these participants in West Virginia were generally receptive to the idea of a SNAP cooperation requirement for various reasons.

- Many believed that a cooperation requirement could promote accountability by getting both parents involved in the financial support of their children. Several participants speculated that the threat of losing their SNAP benefits would serve as a good “motivator” and encourage both custodial and noncustodial parents to provide or pursue child support.
- Some supported the idea because they believed enforcing child support for noncustodial parents would provide additional financial resources to custodial parents in need of support for their children. A few noted that a cooperation requirement could be helpful because it would give custodial parents justification for opening a child support case in instances where they were apprehensive to do so on their own. For example, one participant suggested that custodial parents don’t pursue child support because they are “afraid that the [other parent] would get mad or say stuff.” But if there was a requirement tied to their benefits, then the “family couldn’t get mad.” Another suggested that it would be helpful to grandparents who want to pursue child support from a child’s biological parents.

Expressions of support among interview participants were tempered in some cases and overshadowed in others by other more pressing concerns.

- Many participants questioned the rationale and fairness of making child support cooperation a condition of receiving nutrition assistance, especially because those in need of SNAP were already struggling financially. These participants expressed concern about placing additional financial strain or stress on those who were already struggling to make ends meet. Several participants cited the challenging job market, economy, and opioid epidemic experienced by West Virginians.



"If they're eligible for food stamps [SNAP]...I don't think it would be fair to take that security away from them. If...they don't have the money to spend on food...I think that would be bad in the long run. Because it would cause more stress and more issues, and they would be having to spend more money on food that they could be spending on their rent."

—Custodial parent

- Others expressed concern that the cooperation requirement would force families to engage in a child support system that they believed would place additional strain on their relationship with the other parent, which could lead to a reduction in the amount of informal support provided. Some described situations that they knew of in which involvement in the child support system caused additional "angst" or created "hostility" for the family. Others simply preferred not to engage with or be reliant upon the noncustodial parent for financial support given their relationship dynamics.



"I don't know if I want to get the government involved to keep my food stamps [SNAP].... He's there for his kids. He takes care of his kids. They are cared for. I don't have to worry about them. But I don't get money and I don't want to put him in jail, because I'm not getting [child support] money. As far as I'm concerned, the money is a me-and-him thing. It's not a him-and-his-kids thing."

—Custodial parent

- Several participants did not think parents who are already providing or trying to provide for their children outside of the formal child support system should be required to cooperate. These participants commonly described circumstances in which the other parent was "active" in the child's life by spending time with them or buying them what they could afford. For example, a few participants described arrangements in which they had shared custody or responsibility of their children outside of the formal child support system.
- Others explained that they had not pursued child support through the formal system because they knew or worried that the noncustodial parent could not afford it. For example, one participant noted that the calculations for ordered child support amounts were not always in line with the noncustodial parents' ability to pay. A few of these participants were apprehensive to engage child support because they didn't want to put the noncustodial parent in a bad financial situation or at risk of enforcement actions if they were unable to pay the ordered amount. One participant said that they did not want to pursue child support that would cause the noncustodial parent to "have back child support for the rest of her life that she can't pay."

Participant Areas of Concern or Confusion

Participants in West Virginia identified a few key areas of concern and confusion surrounding a hypothetical SNAP child support cooperation requirement.

- Several participants indicated that they did not have any information about the noncustodial parent that would be necessary for them to cooperate. These participants worried how their lack of information might impact their benefit amount.

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“I really don't have no information on his side at all...I don't even know where he lives at, so I couldn't really share any information with child support.... I would not be very happy about [a cooperation requirement for SNAP], because I don't have no information on him. I can't get no information on him, so that wouldn't be fair to me.”

—Custodial parent

- Others described that cooperation requirements would further complicate their already unique circumstances and expressed a need for the requirement to be applied on a case-by-case basis. For example, one participant described how her father would have had to pursue child support from her when he had guardianship over her children while she was going through rehabilitation, “trying to get [her] life together.”

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“If I could have paid, I would have. So that situation—I don't think it's fair to someone trying to get their life together so they can be a mother.”

—Custodial parent

- A few participants were apprehensive about pursuing formal child support because of concerns related to shared custody or child welfare involvement initiated by the noncustodial parent, particularly when they were not already involved in the child's life.

Potential Impact of Cooperation Requirement on Decision to Apply for Benefits

When asked, many participants indicated that, at least from a hypothetical perspective, the existence of a cooperation requirement in West Virginia would not affect their decision to participate in SNAP. These participants frequently cited how important their SNAP benefits were to their financial situations. However, some participants said that they would forgo their SNAP benefits to avoid being required to engage in the formal child support system. Others explained that they would only find it worthwhile to cooperate with child support to receive SNAP if they received a large SNAP benefit.

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“They would adapt to it.... Because everybody needs help at some point in their life.”

—Custodial parent

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