

Evaluation of Child Support Enforcement Cooperation Requirements in the USDA Supplemental Nutrition Assistance Program (SNAP)

Background

The U.S. Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) administers 16 nutrition assistance programs with the mission to increase food security and reduce hunger - in partnership with cooperating organizations - by providing children and low-income people access to food, a healthy diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

This report responds to a Congressional mandate in the 2018 Farm Bill (Public Law 115-334) for FNS to conduct an independent evaluation of child support cooperation requirements in the Supplemental Nutrition Assistance Program (SNAP). Child support cooperation requirements in SNAP refer to a State option to mandate that families receiving SNAP cooperate with their State’s child support program as a condition of benefit receipt (“cooperation requirement” or “requirement”).

Few States used the option at the time of publication. There has been an active debate about the advantages and disadvantages of States implementing a child support cooperation requirement in their SNAP programs. Supporters of cooperation requirements argue it is a tool to increase the amount of child support paid to custodial parents and reduce their need for government assistance. Critics note the limited ability of many noncustodial parents to pay child support at the level and consistency that would reduce the need for government benefits and potential negative consequences of the cooperation requirement, like deterring food-insecure families from seeking assistance. However, there is little empirical research exploring the implications of the requirement.

This study helps fill this gap using a mixed methods approach to study the implications for both the low-income families affected by the cooperation requirement and the SNAP and child support programs that serve them.

Methods

The study used in-depth qualitative and quantitative data collection in eight States to provide a detailed picture of the implementation and outcomes of requiring cooperation with child support as a condition of SNAP eligibility. Of the nine States that currently require cooperation with child support in SNAP, five participated in this study: Arkansas, Idaho, Kansas, Michigan, and Mississippi. The study also included three States – Ohio, Tennessee, and West Virginia – where there had been recently proposed legislation to mandate a cooperation

Key Findings

- Automated, integrated data systems are key to implementing the requirement but can require substantial upfront costs.
- Ongoing implementation of the requirement creates administrative complexity and costs, particularly for child support staff.
- The requirement may lower SNAP benefit costs to the government, but savings may be offset by increased child support enforcement costs for the government.
- Implementation of the requirement did not result in increased child support payments to SNAP households, on average.
- The financial stability of parents sanctioned for noncooperation with the requirement may worsen and getting back into compliance can be challenging.
- States are not adequately implementing good cause exemptions which are intended to protect parents from domestic violence.

requirement in SNAP. Data sources used to inform the study include:

- Interviews with SNAP and child support program staff in each study State;
- In-depth interviews with SNAP participants in each study State;
- Administrative data collected from SNAP and/or child support programs in each study State; and
- Administrative data and cost workbooks collected in one study State to assess the costs and net benefits of the cooperation requirement.

Findings

Automated, integrated data systems are key to implementing the cooperation requirement, requiring substantial upfront costs for States that do not already have them. SNAP and child support staff in States using the cooperation requirement said it was critical to have a data system that can automatically pass information between the SNAP and child support programs. One of the study States did not need to enhance its data system to implement the cooperation requirement. Among the other seven study States, staff estimated data system updates would cost or did cost anywhere from \$400,000 to \$5 million in upfront costs.

Ongoing implementation of the cooperation requirement creates administrative complexity and costs, particularly for child support staff. Staff described a difficult process to verify the eligibility of SNAP referrals for child support services. Additionally, child support staff found many cases referred from SNAP were challenging to work because the noncustodial parents had limited ability to pay child support. Detailed cost analysis for one study State suggested annualized implementation costs of \$1.34 million, most of which were borne by the child support agency.

The requirement may lower SNAP costs for the government, but those savings may be offset by increased child support enforcement costs for the government. In the one study State with a detailed cost and impact analysis, estimates suggest households experience a decrease in SNAP benefits due to the cooperation requirement, but no increase in receipt of child support payments. Additionally, increased child support enforcement costs offset any government savings that came from SNAP benefit reductions. However, these estimates might not apply to other States.

Implementation of the requirement did not result in increased child support payments to SNAP households, on average. The requirement may offer little financial benefit for custodial parents and may add strain to the co-parenting relationship. Child support and SNAP staff believed cooperation requirements would not increase formal child support collections due to the limited financial

resources of many noncustodial parents. Moreover, they thought the cooperation requirement could disrupt informal support arrangements and relationship dynamics between co-parents. Impact analysis in one study State corroborates these concerns: about half of new child support orders associated with the requirement were for \$0, reflecting the limited ability of noncustodial parents to make child support payments.

SNAP households generally comply with the cooperation requirement, even though they find it confusing. Among the four study States that provided data on sanctions for failure to cooperate with the requirement, about three percent of SNAP households were sanctioned in two States and less than one percent were sanctioned in the other two States. Many interviewed participants reported confusion about what they had to do to cooperate, why it was required, and what the consequences of noncooperation would be.

The financial stability of parents sanctioned for noncooperation may worsen and getting back into compliance can be challenging. After they were sanctioned, participants talked about going without enough money to buy food or finding other ways to make ends meet. For those attempting to come back into compliance, the process was often difficult. Impact analysis from one State supports these participant reports of financial hardship. On average, household losses in SNAP benefits associated with the requirement were not offset by increased child support payments.

States are not adequately implementing good cause exemptions which are intended to protect parents from domestic violence. In most study States, less than one percent of cases subject to the cooperation requirement had a good cause determination. This low rate suggests the cooperation requirements may be exposing families to a risk of violence given the high rates of domestic violence found in a nationally representative study of this population.¹ Across and within study States, there was variation in how staff described good cause policy. Few interviewed participants said they were informed about good cause exemptions at any point during the cooperation requirement process.

¹ More information at <https://www.acf.hhs.gov/css/policy-guidance/safe-access-child-support-services-scope-issue>.

For More Information:

Holcomb, P., Selekmán, R., Moore, Q., et al. (2024). Evaluation of Child Support Enforcement Cooperation Requirements in the Supplemental Nutrition Assistance Program. Prepared by Mathematica, Contract No. GS-10F-0050L/12319819F0141. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Melanie Meisenheimer. Available online at: www.fns.usda.gov/research-and-analysis.