

Unproven, Costly Child Support Cooperation Requirements in SNAP Put Families at Risk



There's strong overlap between the Supplemental Nutrition Assistance Program (SNAP, formerly food stamps) and the Child Support program, which both improve the health and well-being of millions of low-income children. The Child Support program serves the vast majority of eligible low-income families, but some children do not receive support from their non-residential parent. Some policymakers have suggested that the best way to increase participation in the Child Support program and drive more resources to low-income children is to take away SNAP's food benefits from parents who do not cooperate with the Child Support program. But such a policy is dangerous, not supported by evidence, and has proven unpopular among states.

More than 1 in 4 children in the United States have a parent living outside their household.¹ Despite separate living arrangements, both parents often can and do contribute to the financial support of their children. Financial support from non-custodial parents is particularly important when children live in homes with incomes near or below the poverty line. Of children with a parent living outside their home, 37 percent live in poverty.² In these cases, income from a non-custodial parent, when available, can be key to easing financial instability and ensuring that children's basic needs are met.

States can already condition SNAP eligibility for parents living apart on their cooperation with child support and their ability to make timely payments on child support orders. Few states have implemented these policies because they are based on flawed presumptions about the ability of sanctions to change parental behavior; there's no evidence that they generate significantly more child support payments to custodial households; they put the food security of vulnerable people at risk, including children; implementation is expensive and administratively complex for state agencies; and non-punitive policies may be more effective at connecting more low-income individuals to child support services without risking compromising health and well-being.

Key concerns about such a policy include:

- **It puts children at risk.** When parents lose food assistance for non-cooperation, both parents and children stand to get hurt. If a custodial parent is subject to a mandate and fails to cooperate, sanctioning their SNAP benefits reduces the family's overall food budget and puts children at increased risk of food insecurity and inadequate nutrition.

Restricting children's access to sufficient food has short- and long-term impacts. Research indicates that additional food assistance to a household reduces children's food insecurity and improves the nutritional value of their diets.³ Consistent access to adequate nutrition in childhood is also associated with important longer-term outcomes, including greater educational achievement and better health.⁴

- **Families in need of food assistance may forgo benefits out of fear of child support.** Custodial parents who do not engage with the Child Support agency often have a good reason. Some already receive support from the other parent and some do not want to risk undermining the relationship with the other parent to pursue support if they know that parent cannot provide more. Others have suffered abuse and fear that engagement with the Child Support agency will put them at risk. In fact, domestic violence survivors may qualify for a good cause exemption from a cooperation mandate — but they may not know to pursue one. And SNAP eligibility workers often lack the training to screen for domestic violence and are not qualified to make appropriate determinations about whether it is safe for someone to engage child support officials. Taking away SNAP from parents who decide that it isn't in their family's best interest to pursue child support will leave them with less help affording food.

A cooperation mandate on custodians also puts food assistance at risk for low-income households in which a grandparent, or other relative caregiver, has taken on parental responsibilities. More than 2.5 million grandparents are raising their grandchildren.⁵ Many are doing so informally, without official custody or foster care arrangements. A requirement for custodians to pursue child support would mandate that these grandparents seek payments from parents in order to be eligible for SNAP benefits. Some grandparents might forgo SNAP if they had concerns about the state pursuing the parents for child support. For example, a grandparent might not want to implicate a parent struggling with drug addiction or mental health issues in a child support enforcement action. Also, in cases involving prior abuse by a parent, the grandparent might fear for their own safety or the

child's if they sought child support. And if a grandparent did seek child support, the parent might reclaim custody of the child — which might not be in the child's best interest — rather than pay support.

- **Imposing more hardship on non-custodial parents who can't afford child support will not improve outcomes.** Taking away SNAP benefits from a non-custodial parent who is struggling to meet their own basic needs for non-cooperation with the Child Support program can hurt both the parent and their children. Frequently, non-custodial parents do not provide support because they are poor — not because they are unwilling to provide support to their children. Even when non-custodial parents cannot pay the full amount of their orders, many provide partial payments or in-kind support (e.g., meals, child care, or diapers).
- **The costs associated with mandatory cooperation could dwarf the benefits.** Proponents of a cooperation mandate presume that increased child support payments will outweigh the costs associated with implementing such policies, including establishing orders and pursuing collections. But if the underlying assumptions about a punitive policy's ability to compel behavior change among parents are wrong, this would not bear out. Mandating that custodial and non-custodial parents cooperate with the Child Support program is administratively complex and carries significant costs for the government, and by extension, taxpayers. Cooperation mandates require expensive investments in systems change, considerable enhancements in information sharing between state SNAP workers and Child Support staff, and appropriate and timely notification of SNAP applicants and participants. Furthermore, such mandates result in many new cases that require additional Child Support staff and drain resources from existing cases, yet yield little or no additional child support payments.

In 2014, Utah commissioned a study on the impact of such a requirement. It found that a cooperation mandate would take a significant number of adults off food assistance but few custodial families would end up receiving additional funds from child support payments, and implementation would cost between \$3.2 million and \$3.6 million for systems changes and new Child Support staff.⁶ When the Congressional Budget Office estimated the cost of implementing the policy nationally, it similarly projected that associated administrative costs borne by the federal and state governments would far exceed new child support payments.⁷

- **Family-centered policies are a better option.** In recent years, the Child Support program has moved toward a family-centered approach that aims to work with both parents, address families' specific needs, and mitigate payment barriers, in part by distinguishing between non-custodial parents unwilling to pay and those unable to.⁸ To improve engagement, Child Support agencies are testing digital tools and incorporating lessons from behavioral science and offering supportive services beyond the traditional enforcement functions of child support. These new approaches reflect a desire to transform Child Support into a service that families seek out because they value the support it provides, rather than a punitive system to be avoided.

To avoid compromising state funds and leaving families more vulnerable for little proven payoff, state policymakers contemplating a cooperation mandate should consider the many arguments against the policy and the significant downside risks. They should instead study the factors preventing participation; expand current, successful efforts to boost participation and improve coordination between SNAP and Child Support; and offer support for parents struggling to pay.

For more information see: Joseph Llobrera, "Child Support Cooperation Requirements in SNAP Are Unproven, Costly, and Put Families at Risk," Center on Budget and Policy Priorities, updated February 5, 2020, <https://www.cbpp.org/research/food-assistance/child-support-cooperation-requirements-in-snap-are-unproven-costly-and-put>.

¹ Timothy Grall, "Custodial Mothers and Fathers and Their Child Support: 2015," U.S. Census Bureau, January 2018.

² *Ibid.*

³ Ann M. Collins et al., "Summer Electronic Benefits Transfer for Children (SEBTC) Demonstration: 2012 – Final Report," U.S. Department of Agriculture, August 2013, <https://fns-prod.azureedge.net/sites/default/files/SEBTC2012.pdf>.

⁴ Steven Carlson et al., "SNAP Works for America's Children," CBPP, September 29, 2016, <https://www.cbpp.org/research/food-assistance/snap-works-for-americas-children>.

⁵ Generations United, "Grandfamilies," <https://www.gu.org/explore-our-topics/grandfamilies/>.

⁶ Rodney W. Hopkins, "Food Stamp Child Support Cooperation Study," Social Research Institute, University of Utah, August 29, 2014.

⁷ Congressional Budget Office, "Cost Estimate: H.R. 2: Agriculture and Nutrition Act of 2018," May 2, 2018, https://www.cbo.gov/system/files?file=2018-07/hr2_1.pdf.

⁸ Office of Child Support Enforcement (OCSE), U.S. Department of Health and Human Services, "National Child Support Strategic Plan for 2015-2019," https://www.acf.hhs.gov/sites/default/files/programs/css/national_child_support_strategic_plan_2015_2019.pdf.