



**MICHIGAN  
POVERTY  
LAW  
PROGRAM**

**MPLP**  
220 EAST HURON  
SUITE 600A  
ANN ARBOR, MI  
48104

**PHONE:**  
(734) 998-6100

**FAX:**  
(734) 998-9125

**WEB:**  
[www.mplp.org](http://www.mplp.org)

**EMAIL:**  
[lruby@mplp.org](mailto:lruby@mplp.org)  
[rshiemke@mplp.org](mailto:rshiemke@mplp.org)

May 14, 2018

The Honorable Michael Conaway  
Chairman  
Committee on Agriculture  
United States House of Representatives  
Washington DC 20515

The Honorable Collin C. Peterson  
Ranking Member  
Committee on Agriculture  
United States House of Representatives  
Washington DC 20515

Dear Chairman Conaway and Ranking Member Peterson:

On behalf of the Michigan Poverty Law Program (MPLP) and the low-income people of Michigan we serve, we submit this letter to urge the House Committee on Agriculture to reconsider its proposal to impose a federal mandate on the requirement that custodial and non-custodial parents cooperate with child support to be eligible for Supplemental Nutrition Assistance Program (SNAP) benefits. MPLP is the statewide support center for Legal Services programs and other poverty law advocates in Michigan. We provide research, training, and litigation support to Legal Services offices statewide and engage in legislative and administrative advocacy. In providing support to attorneys throughout the state, we regularly come in contact with those working with recipients of SNAP benefits and are familiar with the challenges these families face. We are writing to express our concerns with the proposed bill and why it will negatively impact SNAP recipients nationwide.

Michigan is one of six states that has already implemented the child support requirement for SNAP eligibility. The negative impact of this requirement in Michigan is widely felt on families, for 35% of SNAP households in Michigan include children.<sup>1</sup> Human services workers, tasked with determining eligibility and compliance, frequently confuse a recipient's ignorance of application procedures with non-compliance and families are screened out unfairly. Unaware of the requirements and application process for SNAP, families are left confused and intimidated by the process. Families may not finish the application or may fail to complete a required step as a result. Human services workers also fail to inform domestic violence survivors that they have the right to claim a good cause exception to the cooperation requirement and fail to mention that the verification process is optional - a police report or protective order is not needed. In addition, administrative errors can block families from receiving these benefits, leaving families without a reason for the denial of their application. Thus, misinformed families may be unfairly denied critical SNAP benefits as a result of its daunting and impractical application process.

The child support requirement places an excessive burden on custodial parents in Michigan and creates a chilling effect on applicants. Nationwide, more than 4 in 10 mothers who do not receive child support are survivors of physical or emotional abuse.<sup>2</sup> A custodial parent who has experienced domestic violence may decide to forego SNAP benefits all together to avoid placing themselves and their child in danger during child support proceedings. SNAP eligibility workers who are not trained to screen for domestic violence may make incorrect decisions about the level of safety a domestic violence survivor may have during child support proceedings. Although independent verification of abuse is not required under Michigan policy, many workers require it based on a belief that survivors are not believable or are "gaming the



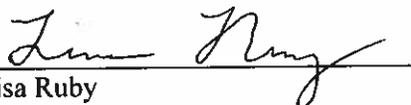
system.” Domestic violence occurs in private, there are often no other witnesses, and many survivors are fearful to seek assistance from law enforcement or the courts. Also, custodial parents may be reluctant to start child support proceedings if they do not want to risk undermining their relationship with the other parent. Denying custodial parents SNAP benefits because of their choice to protect their families increases their children’s risk of food insecurity.

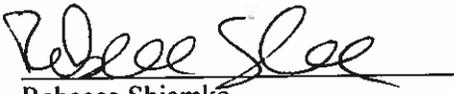
Mothers who are unable to identify with certainty or specificity the father of their child experience a stigma associated with the child support requirement. A mother in this situation may feel unable to approach human services workers to apply for SNAP benefits due to embarrassment and the system’s intimidating process. Consequently, these narrowly drawn requirements may deter mothers from applying for SNAP benefits, forcing them to choose between their family’s safety and nutrition.

Throughout the state of Michigan, we have seen a great reliance on SNAP benefits. In comparison to other public benefits programs, such as cash assistance and unemployment, SNAP is one of the most receptive and generous federal programs.<sup>3</sup> SNAP’s intended purpose is to provide the most basic human need to low income individuals – food. Hence, it differs from other public benefits programs due to the urgency present in providing food for 1 in 8 Americans nationwide.<sup>4</sup> The Great Recession led to an increase in SNAP participation, yet SNAP benefits are still desperately needed. SNAP enrollment historically has remained high several years after a recession and has lagged behind improvements in other public benefits programs. While programs like unemployment benefits are currently at rates seen before the Great Recession<sup>5</sup>, the Congressional Budget Office predicts that participation rates for SNAP will not return to rates seen before the Great Recession until 2028.<sup>6</sup> This alone stresses the current and future need for continued SNAP benefits over the next decades.

The proposed legislation will not increase child support for low income families. In Michigan, the child support compliance mandate has discouraged and prevented eligible families from accessing SNAP benefits. Access to food is a basic human need that all individuals deserve, regardless of economic status. SNAP benefits help reduce food insecurity, alleviate poverty, and improve the overall health and educational outcomes of children. The proposed legislation creates obstacles that prevent eligible individuals from accessing SNAP benefits. We appreciate your consideration of this letter and urge you to reconsider the proposed legislation. Please contact us if you have any questions.

Sincerely,

  
Lisa Ruby  
Public Benefits Attorney  
Michigan Poverty Law Program

  
Rebecca Shiemke  
Family Law Attorney  
Michigan Poverty Law Program

cc: U.S. Senator Patrick Roberts  
U.S. Senator Deborah Stabenow

<sup>1</sup> <http://www.frac.org/wp-content/uploads/snap-facts-mi.pdf>

<sup>2</sup> <https://www.cbpp.org/research/food-assistance/house-farm-bills-snap-cuts-work-requirements-would-hurt-children>

<sup>3</sup> <https://www.cbpp.org/research/no-mystery-why-snap-enrollment-remains-high-its-still-the-economy>

<sup>4</sup> <https://www.cbpp.org/research/food-assistance/house-farm-bills-snap-cuts-work-requirements-would-hurt-women>

<sup>5</sup> <https://data.bls.gov/timeseries/LNS14000000>

<sup>6</sup> <https://www.cbo.gov/system/files/115th-congress-2017-2018/reports/53651-outlook.pdf>