



August 30, 2018

Dear Farm Bill Conferees:

RE: House Child Support Program Provisions in Farm Bill

The National Child Support Enforcement Association (NCSEA) serves child support professionals, agencies, and strategic partners worldwide through professional development, communications, public awareness, and advocacy. NCSEA appreciates the interest and bipartisan support of Congress for the Title IV-D child support program.

The child support program is an especially effective and efficient federal, state, tribal, and local program. In FY 2016, child support agencies collected over \$32.7 billion to support one in five children in the United States. For every one dollar in government investments in the program, the program collects \$5.33. It is a successful anti-poverty program, lifting more than one million people out of poverty in 2015, according to the federal Office of Child Support Enforcement.

As you reconcile the differences between the Supplemental Nutrition Assistance Program (SNAP) provisions in the House's *Agriculture and Nutrition Act* (H.R. 2) and provisions contained in the Senate's *Agriculture Improvement Act* (S. 3042), we want to convey our positions on two provisions contained in H.R. 2, as follows.

Child Support Arrears: NCSEA supports the House provision in Section 4011 (a) to remove the SNAP disqualification for child support arrears. We urge the Senate to recede to the House on that specific provision.

Mandatory Child Support Cooperation: NCSEA is concerned about Section 4011 (b) of H.R. 2 to mandate all states to adopt mandatory cooperation requirements and urges the House to recede to the Senate on that specific provision.

Congress has given states and tribes options to administer the program so that it continues to be a very successful intergovernmental partnership. As such, NCSEA strongly supports continuing that flexibility to design state-level policies to best meet the needs of their residents, including maintaining the state option to choose mandatory cooperation.

States make policy decisions based on their unique demographics and circumstances of the people they serve. Enacted in 1996 as part of welfare reform, the current option to mandate cooperation is in force in six states (Florida, Idaho, Kansas, Michigan, Mississippi, and South Dakota). They should be allowed to continue to administer the program using the option. At least seven other states (Delaware, Idaho, Kentucky, Minnesota, Ohio, and Rhode Island), however, adopted the option but have since rescinded it. Many states did indeed proceed initially with the option but for various reasons found that mandatory cooperation did not achieve the desired results. The remainder of the states have elected not to implement the option at



present due to their respective state circumstances. And, the Congressional Budget Office (CBO) May 2, 2018, analysis of the provision found it not to be cost effective. The CBO estimates that the mandatory cooperation provision will reduce SNAP benefits to affected households and would increase total federal costs by billions over that timeframe. State and tribal programs would need to increase the state and tribal share of their budgets significantly to comply with the mandate.

Before mandating a cooperation requirement for all states, NCSEA proposes a review of the states that currently have the requirement and those states that rescinded the requirement in order to analyze the cost of implementation and the success of such a requirement. An appropriate undertaking for the federal Office of Child Support Enforcement would be to conduct such a review and report back to Congress. Until such time, however, we urge that the House provision be excluded from the final House-Senate conference bill.

NCSEA is committed to continuing to improve an already successful child support program, and we offer our assistance and expertise in finding other ways to improve SNAP and child support coordination and cooperation.

Sincerely,



Executive Director
NCSEA

