



May 14, 2018

The following letter was sent to the Chairs and Ranking Minority members of the Ways & Means and Agriculture Committees of the U.S. House of Representatives:

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 support of Congress for the Title IV-D child support program. While we support the provision in H.R. 2 (Farm Bill) that removes Supplemental Nutrition Assistance Program (SNAP) disqualification for child support arrears, NCSEA wishes to express concerns, with certain provisions related to SNAP and mandatory cooperation with child support.

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.

Congress has given states and tribes options to administer the program so that it continues to be successful in delivering these results. NCSEA strongly supports continuing that flexibility to design state-level policies to best meet the needs of their residents. Based on that fundamental intergovernmental tenet, we urge the House to re-consider the Farm Bill provision changing the current child support cooperation option available to states into a requirement that all states implement mandatory child support cooperation. This matter arose quickly and needs time for federal, state, and tribal governments to consider the implications. NCSEA supports the provision that removes SNAP disqualification for child support arrears.

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other states (Delaware, Idaho, Kentucky, Minnesota, Ohio and Rhode Island), however, adopted the option but have since rescinded it.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.

NCSEA acknowledges that many individuals who receive SNAP benefits may be living in poverty and could benefit from child support services. Before mandating a cooperation requirement for all states, we would propose a review of the states that currently have the requirement and those states that rescinded the requirement 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.

The child support program is a data-rich program, and agency performance is evaluated using a number of metrics. Given the reliance on data to make continued improvements to the program, NCSEA notes that the Congressional Budget Office (CBO) May 2, 2018 analysis of the provision as drafted currently is not cost effective. Not only does CBO estimate that the mandatory cooperation provision will reduce Supplemental Nutrition Assistance Program (SNAP) benefits to affected households, it would increase total federal costs by billions over that timeframe. State and tribal programs will need to increase the state and tribal share of their budgets significantly to comply with the mandate.

Child support professionals serve families and their children by establishing parentage, locating persons owing support, establishing, enforcing, and modifying support orders, and paying collections to families. Child support agencies endeavor to pursue and act upon each and every case and, indeed, a research study with U.S. census data in the state of Utah shows that the majority of SNAP families requiring support orders already have them. There are cases, however, in which it does not make sense for the custodial parent to pursue enforcement, for their own personal safety or because there are informal arrangements or divorce-related agreements in effect, for example. While the legislation does not change the law allowing for “good cause” exemptions for non-participation in child support, NCSEA emphasizes that such policies should be retained to allow child support agencies to address the unique circumstances of individuals they serve.





Given the reasons above, NCSEA at this time cannot support the mandatory child support cooperation provision as currently drafted. We urge the House to consider changes to address our concerns and consider taking up a closer examination of the issue. 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,

A handwritten signature in black ink, appearing to read "Diane Potts".

Diane Potts
President

A handwritten signature in black ink, appearing to read "Ann Marie Ruskin".

Ann Marie Ruskin
Executive Director

