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IssueBRIEF

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Child Support Cooperation Requirements in Child Care Subsidy Programs and SNAP: Key Policy Considerations

The EMPOWERED study, conducted on behalf of the Assistant Secretary for Planning and Evaluation (ASPE) at the U.S. Department of Health and Human Services, examines the use of performance measures, work requirements, and child support cooperation requirements across human services programs. This issue brief examines the use of child support cooperation requirements in the Supplemental Nutrition Assistance Program (SNAP) program and child care subsidy programs funded under the Child Care Development Fund (CCDF).

HIGHLIGHTS

- States have the option to require recipients of child care subsidies and Supplemental Nutrition Assistance Program (SNAP) to cooperate with child support agencies seeking to establish paternity and support orders; and to enforce child support obligations as a condition of eligibility.
- Child support cooperation is more frequently required by child care subsidy recipients (required by 23 states) than SNAP recipients (required by 7 states).
- Within federal parameters, states have considerable flexibility to design cooperation requirement policies. Policy variation across states affects who is subject to the cooperation requirement, the criteria used to determine good cause exemptions, and penalties for noncooperation. A better understanding of how these policies are implemented at the local level is needed to identify best practices for the field.
- Minimal data on cooperation requirements for child care subsidy and SNAP recipients are collected by states. While there is heightened interest among state and federal policymakers to expand the mandate for child support cooperation requirements, the impact of cooperation requirements on program operations and staff workload, program participation, child support receipt, and family's economic well-being remains largely unknown.

Some public programs—Temporary Assistance for Needy Families (TANF), Medicaid, and Foster Care maintenance payments under Title IV-E of the Social Security Act—have a mandatory requirement for applicants and participants to cooperate with the child support program (also known as the IV-D program) to establish paternity and support orders, and to enforce child support obligations. However, for other means-tested public programs, states have the option to exercise a child support cooperation requirement (Figure 1). This brief focuses on the child care subsidy program funded under the Child Care and Development Fund (CCDF) and the Supplemental Nutrition Assistance Program (SNAP).

BACKGROUND

Since the enactment of the landmark 1996 federal welfare reform law (the Personal Responsibility and Work Opportunity Reconciliation Act, or PRWORA), states have had the option to require SNAP applicants and recipients—custodial parents, noncustodial parents, or both—to cooperate with child support.[1] Additionally, under SNAP rules, states also have the option to disqualify noncustodial parents who are in arrears with their court-ordered child support payments. Some states have also enacted laws or policies that require applicants for and recipients of child care subsidies funded under the Child Care Development Fund (CCDF) to cooperate with the child support program as a condition of eligibility.

Requiring child support cooperation for public program participants is a strategy for reducing poverty and promoting economic mobility.

The **IV-D child support program** collects money from noncustodial parents and distributes that financial support to their children. For some public programs, states must require cooperation with child support as a condition of eligibility. For other public programs, states have the option to require cooperation with child support.

REQUIRED FOR ALL STATES

TANF provides financial assistance for eligible low-income families with children to help pay for food, shelter, utilities, and other basic needs

Medicaid provides health coverage to eligible low-income adults, children, pregnant women, elderly adults and people with disabilities

MAY BE REQUIRED BY STATE

SNAP provides nutrition assistance to eligible, low-income individuals and families through a monthly benefit

CCDF provides financial subsidies to low-income families to access child care so that parents can work or attend job training or educational programs

Figure 1. Public programs and child support cooperation requirements

As part of a broader policy conversation about ways to reduce poverty and promote economic mobility, there is increased interest at both the federal and state levels how other public programs can use child support cooperation requirements to (1) increase self-sufficiency and reduce the need for public assistance by increasing family income and (2) increase participation in the child support system and noncustodial parents' financial support of their children (Doar 2016; Executive Order no.13828, 2018).[2] This conversation is, in part, prompted by concern over a steady reduction in the IV-D child support caseload, driven largely by a decline in cases that are current or former TANF participants.

This brief provides context for discussions on this important and still evolving policy issue by summarizing findings from an exploratory examination of the current landscape of optional cooperation requirements. We draw on several sources, including a scan of publicly available data, discussions with federal stakeholders, and in-depth discussions with child support, child care, and SNAP administrators in eight states: Colorado, Florida, Kansas, Michigan, Mississippi, North Carolina, South Dakota, and Virginia.

We begin with a national snapshot of the current status of states' adoption of cooperation requirements for child care subsidy and SNAP recipients and an overview of the process used to implement the requirement. Next we describe key points in the cooperation process at which states have flexibility to shape policy, and illustrate some policy variations between the eight study states. Then we offer considerations for policy and practice and highlight areas ripe for future research. More details about the study methods can be found at the end of this brief.

Low-income families that participate in multiple public programs can face a complex array of cooperation requirements with different policies and rules.

USE OF COOPERATION REQUIREMENTS: A NATIONAL SNAPSHOT

As of May 2018, 24 states had exercised the option to require recipients of child care subsidies and/or SNAP to cooperate with the child support program. Cooperation requirements are much more common in child care programs than in SNAP. Seventeen states require child support cooperation only for recipients of child care subsidies; one state requires cooperation only for SNAP recipients; and six states require cooperation for both child care subsidy and SNAP recipients (Figure 2).[3]

Some states have many years of experience applying these kinds of cooperation requirements. Among the study states, Michigan and Mississippi have had cooperation requirements in place since the 1990s, with Florida following suit in the early 2000s. Since 2005, Colorado, which has a county-administered child support program, has given counties the option to require cooperation of child care subsidy recipients.

Child support cooperation may include participation in activities such as genetic testing; attending court hearings; and sharing financial documents and information to locate the noncustodial parent.

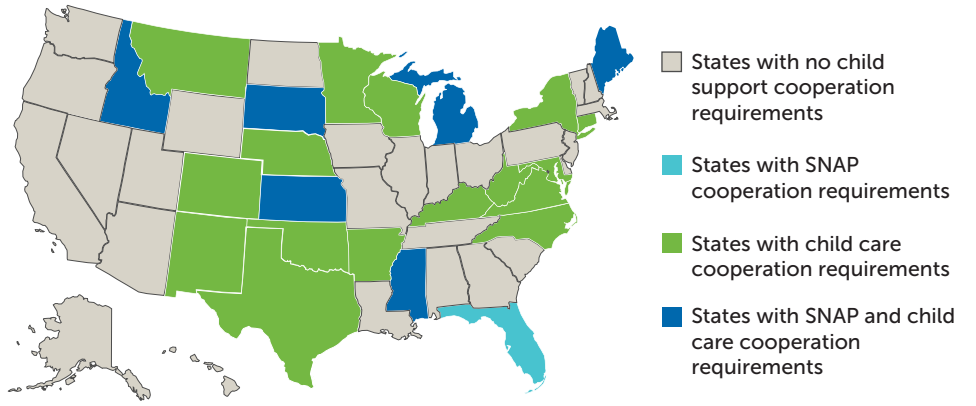


Figure 2. Use of child support cooperation requirements in child care subsidy programs and SNAP, by state

Sources: The National Conference of State Legislatures Child Support and Family Law Legislation Database; the Child Care Development Fund Policies Database; U.S. Department of Agriculture Annual State Option Reports; and the National Council of Child Support Directors' May 2018 survey of state child support directors.

Note: One U.S. territory, Guam, exercises the option to disqualify custodial parents from SNAP eligibility for noncooperation with child support.

About half of its counties require cooperation at this time. Since 2015, five states have established cooperation requirements for the first time[4]:

- Kansas (2015) requires cooperation for recipients of child care subsidies and for SNAP recipients.
- Virginia (2016) requires cooperation for child care subsidy recipients.
- North Carolina (2017) requires cooperation for child care subsidy recipients in three pilot counties where a cooperation requirement is being implemented.[5]
- South Dakota (2017) requires cooperation for SNAP recipients.
- Maine (2017) requires cooperation for SNAP recipients.

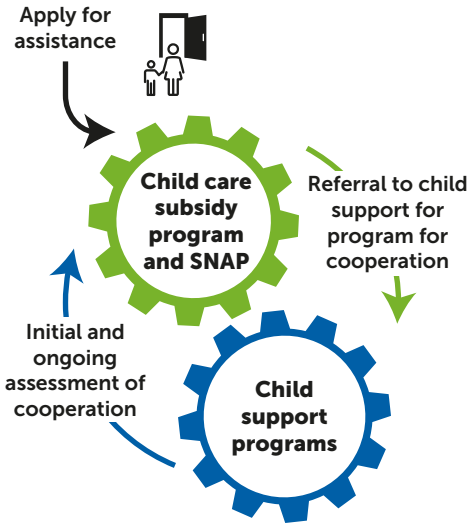
The option to establish child support cooperation requirements for child care subsidy or SNAP recipients also allows states to rescind the requirement. Currently, no single data source contains information that could be used to compile a complete record of the use of cooperation requirements across states over time. Based on our scan, however, it appears that take-up of the option is dynamic, with some states adding and others dropping the cooperation requirement in these programs. For example, Wisconsin began requiring SNAP recipients to cooperate in 2002 but eliminated the requirement in 2009. Idaho required SNAP recipients to cooperate from 2004 through 2009, eliminated the requirement in 2011, and reinstated it in 2015.

Overall, a comparison of our scan of states that required cooperation in child care subsidy programs or SNAP as of 2018 and a similar review conducted around 2005 suggests a slight upward trend in the overall number of states with these kinds of cooperation requirements (Roberts 2005). The total number of states with cooperation requirements for child care subsidy recipients increased from 14 in 2005 to 17 in 2018, with 6 states adding the requirement and 2 dropping it. Also, comparing changes between 2005 and 2018, three states (Kansas, Maine, and South Dakota) chose to start exercising the option to have a SNAP child support cooperation requirement, and Wisconsin dropped it.

Since 2005, relatively few states have chosen to establish cooperation requirements for recipients of child care subsidies or SNAP recipients, although, many proposals involving these requirements were introduced during recent state legislative sessions. These have either failed or were left pending at the close of the session. Since 2015, for example, according to the National Conference of State Legislatures' Child Support and Family Law Legislation Database, 17 states introduced at least once bill establishing child support cooperation in SNAP and 7 states introduced at least one bill establishing cooperation requirements in child care subsidy programs.

Since 2015, 17 states have introduced at least one legislative proposal to establish child support cooperation in SNAP.

OVERVIEW OF THE COOPERATION REQUIREMENT PROCESS



Administering cooperation requirements relies on close coordination between the referring assistance program (the child care subsidy program or SNAP) and the child support program. In turn, both systems need to inform and interact with the individuals seeking or receiving assistance and communicate the outcome of those interactions to each other within established timeframes. This section summarizes the general steps in the process and describes how an automated electronic interface can facilitate it.

Key steps in the cooperation process. The cooperation process begins when a person applies for assistance. The assistance program informs the applicant of the cooperation requirement and determines whether the applicant should be referred to the child support program for services. After receiving the referral, the child support agency contacts the individual to obtain information required to establish paternity or a support order (if needed) and enforce the order. The child support agency is typically responsible for tracking cooperation and updating the assistance agency on cooperation status. The assistance agency is generally responsible for making the initial referral to the child support agency, but there are exceptions. For example, in Mississippi and South Dakota, it is the responsibility of the child care subsidy applicant to initiate contact with the child support office to open a case if one has not been opened and to obtain verification of cooperation.

Applicants can be excused from cooperation requirements for good cause if they demonstrate that cooperating with child support would not be in the best interest of the child; for example, if it might increase the risk of physical or emotional harm to the child or custodial parents. States set their own standards of proof for demonstrating good cause, ranging from personal testimony to court documents proving the risk of harm to the child or custodial parent. Good cause is frequently determined during the initial application period or soon thereafter, but can be assessed at any point during program participation. An exemption from the cooperation requirement can be determined at any point by the assistance agency or the child support agency. If applicants or recipients do not cooperate, they are notified of their noncooperation status, and they have an opportunity to cooperate or be determined exempt for good cause.

Sanctions for noncooperation with child support depend on the type of assistance program and the state's policy choices. For example, the sanction for SNAP recipients is typically a reduction in the overall household SNAP benefit, whereas the sanction for child care subsidy recipients is typically the loss of the entire benefit. In addition, the duration of the sanction may vary from a minimum of one month to as long as 10 years. If the recipient begins to cooperate with child support, the child support agency modifies the cooperation status. Recipients may have their benefits automatically reinstated or they may have to reapply. Once recipients no longer receive assistance, they are no longer required to cooperate with child support. However, the child support program will continue to collect child support on behalf of the children unless the custodial parent asks the program to close the child support case.

This overview of the cooperation process is based on a single program, but low-income families often participate in more than one public benefit program and therefore may face multiple cooperation requirements. This adds layers of complexity for the administering agencies and for families subject to these requirements, especially when the cooperation policies, processes, and data systems vary by program. For example, a state's TANF sanction for child support noncooperation could result in a full-family sanction (that is, termination of benefits and case closure), whereas SNAP applies a partial-family sanction for noncooperation (that is, the non-cooperating individual is removed from the household, which typically reduces the household's overall benefit allotment, and the

Automated electronic interfaces greatly facilitate the implementation of cooperation policies.

remaining household members may continue to receive SNAP assistance). Thus, if members of a household receive benefits from more than one program, they need to understand that the penalty for noncooperation can vary by program and know how it affects their eligibility and benefits

Facilitating the cooperation process through an automated electronic interface. Putting cooperation requirements into practice is a complex endeavor. To facilitate referrals and sharing of information, some states rely on an automated electronic interface between the child support data system and the child care program and/or SNAP data systems, similar to the automated electronic interfaces that have been developed between state TANF and child support systems. Some study states use manual processes to coordinate transmission of information, some use automated electronic interfaces, and some use a mix of the two:

- Florida, Kansas, and Michigan have an automated electronic interface between their assistance program(s) and the child support program.
- Mississippi and South Dakota have an automated electronic interface between the child support program and SNAP, but not between the child support and child care subsidy programs.
- Colorado, North Carolina, and Virginia rely on a manual process to exchange information.

Although the particular data elements and system structures vary, automated electronic interfaces typically enable the assistance program's eligibility data system to send nightly batch referrals to the child support office, which then alert the child support office to open a case and begin engaging with the parent subject to the cooperation requirement. When a child support worker makes a change in cooperation status in the system, the assistance worker receives an electronic notification of the change. In some states, such as Kansas, a change in cooperation status automatically triggers notifications and other case closure actions in the eligibility system. In other states, child care or SNAP workers still have to manually change the cooperation status in the assistance program's eligibility data system to trigger notifications and case closures. While automated electronic interfaces are complicated and can be expensive to design and implement, respondents from the study states generally agreed that having an electronic interface provided critical support for implementing these types of cooperation policies and is far preferable to more time-consuming, labor-intensive manual processes.

In states and programs without an automated electronic interface, referrals between programs required manual processes to communicate information. One county in Colorado developed a Microsoft Access database for the child support and child care programs to share, so that staff could record interactions with recipients and track cooperation status. In North Carolina, child care subsidy program staff and child support program staff use mail, fax, or email to share information about clients required to cooperate with child support. In Virginia, child care subsidy program staff also use mail, fax, or email to send information to the child support program; however, for updates on cooperation status, child care subsidy staff manually access a web-based computer system that stores information across public programs to check the child support cooperation status of their clients.

KEY POLICY CONSIDERATIONS

In general, states have considerable flexibility to design cooperation requirements. For example, they can determine who should be subject to the cooperation requirement, define the criteria and standards of proof for good cause exemptions within parameters set by the federal government, and determine the penalty for noncompliance without good cause.

POLICY CONSIDERATION 1: WHO SHOULD BE SUBJECT TO THE COOPERATION REQUIREMENT IN STATE OPTION PROGRAMS AND WHEN SHOULD COOPERATION BE ASSESSED?

Eligibility criteria for child care subsidies and SNAP can influence how states determine who should be subject to the cooperation requirement. Cooperation requirements primarily apply to the custodial parent (or the person who has physical custody of the child), but states may also require the noncustodial parent to cooperate.

In our study sample, child care subsidy programs do not require noncustodial parents to cooperate with child support, because child care subsidies are provided specifically to custodial parents. Therefore, noncustodial parents are not referred

States may require noncustodial parents to cooperate with child support but typically only require cooperation of custodial parents.

to child support unless they are applying for assistance as the custodial parent for another child.

Among the five study states with a cooperation requirement for SNAP recipients, three states include specific policy language that appears to extend cooperation requirements to noncustodial parents. In these states, respondents reported that defining cooperation is challenging but can include making good faith efforts to provide child support payments. However, in practice, it appears these states are focused primarily, if not exclusively, on successfully implementing cooperation requirements for custodial parents in the SNAP household.

The initial assessment of child support cooperation may take place before or after the determination of an applicant's eligibility to receive benefits. For example, Mississippi[6] and North Carolina require applicants for child care subsidies to verify cooperation with child support before determining their eligibility for assistance, whereas the remaining study states determine whether the applicants are eligible for assistance before initiating steps to establish cooperation with child support. Similarly, South Dakota and Kansas check child support cooperation status for SNAP recipients before making a final determination on eligibility for assistance, whereas Florida, Michigan, and Mississippi determine SNAP eligibility before verifying child support cooperation.

Among states that do not determine eligibility before requiring child support cooperation, respondents described working with applicants to encourage them to cooperate with child support and having application processing times delayed because they were waiting for the child support program to verify cooperation. Child care and SNAP respondents believed the ability to determine assistance eligibility before establishing child support cooperation enabled them to meet program-specific time frames for processing applications and to connect recipients to services in a timely manner.

Child support caseworkers assess and note the recipients' cooperation status on an ongoing basis. If an individual stops cooperating with child support at any point, the child support worker will notify the child care and/or SNAP worker directly or through the automated electronic interface. Programs use this information to apply a penalty for noncooperation in various ways:

- Staff in child care subsidy programs who are notified of any changes in a recipient's cooperation status may only take steps to initiate the sanction process at the point of subsidy recertification, which takes place every 12 or more months.[7] If the recipient does not cooperate at that time, and has not demonstrated good cause for refusal to cooperate, the child care case is closed for noncooperation.
- For SNAP, a change in cooperation status prompts the SNAP worker to notify the recipient that the sanction will be applied if he or she fails to cooperate with child support, pending a determination of good cause for refusal to cooperate. Most states provide a 10-day window from the time recipients are notified of their noncooperation status to the time that they must reestablish cooperation before the sanction is imposed.

POLICY CONSIDERATION 2: UNDER WHAT CIRCUMSTANCES SHOULD A PERSON BE EXEMPT FROM COOPERATION REQUIREMENTS?

Federal law requires states to provide good cause exemptions from child support cooperation requirements for all public programs. However, within federal parameters that take into account the best interests of the child, states may define the specific criteria used to define what constitutes good cause. Best practices for good cause determination for TANF recipients have been identified by federal agencies and domestic violence advocacy groups (Davies 2000). Such practices include providing a thorough explanation of child support cooperation requirements, describing the availability of exemptions and other safeguards, providing enough time for recipients to make a decision about proceeding with child support services, and identifying ways for recipients to cooperate with child support without sacrificing their safety.

Among the study states, good cause criteria includes cases in which (1) there is a threat of harm (including physical, sexual, and mental harm) to the parent or children, (2) the child was born because of rape or incest, or (3) there is a pending adoption proceeding for the child.

States may also decide which agency is responsible for determining whether a good cause claim is valid. Among the eight study states, agencies typically shared this responsibility, with eligibil-

ity workers determining good cause if a claim was made before the child support referral and the child support workers determining good cause after receiving a referral. Two study states specifically noted that a determination of good cause exemption granted by any one public program carries over to all public programs. One state reported that it uses an Intimate Partner Violence (IPV) indicator tool to identify if good cause exists. In another state, state-level staff meetings were being held to address concerns that eligibility workers were not communicating the good cause exemption clearly to recipients. For the most part, study states aligned their good cause criteria for child care subsidy and/or SNAP recipients with those for TANF recipients.

Reasons for granting good cause exemptions typically include the threat of harm to the parent or child, a child born of rape or incent, or pending adoption proceedings for the child.

A few study states have gone beyond the good cause exemption criteria used by their TANF programs and another state was considering doing so:

- In 2016, Colorado expanded good cause to include teen parents in response to reports that the child support cooperation requirements created barriers for teen parents in accessing child care subsidies that could otherwise help them stay in school.
- North Carolina, which is currently piloting a new cooperation requirement in its child care program, created additional good cause exemption categories designed to reduce referrals of child care subsidy recipients who do not need to be connected to child support services, such as those who already have child support orders in place or those in households where the absent parent was deceased or incarcerated.
- Virginia, like North Carolina, was still in the early stages of implementing a child support cooperation requirement for its child care subsidy program. Respondents expressed interest in examining how the flexibility to design good cause exemptions could be leveraged to reduce inappropriate referrals to child support and thereby reduce unnecessary burden on the child support program.

POLICY CONSIDERATION 3: WHAT SHOULD BE THE CONSEQUENCES FOR NONCOOPERATION?

Study states typically define cooperation with child support as (1) completing a child support intake form that is used to gather information about the non-custodial parent, and (2) following through with any activities necessary for opening and maintaining a child support case. This includes providing information or documentation relative to establishing paternity, identifying and locating the noncustodial parent, and providing any other information deemed necessary to establish and enforce the child support order. For example, the child support agency could determine that noncooperation exists if the custodial parent missed scheduled appointments, did not appear for scheduled court dates, or otherwise failed to provide requested information within required time frames.[8]

Penalties for noncooperation are commonly referred to as sanctions. Sanctions are intended to encourage cooperation with program requirements when recipients might not have cooperated otherwise. State policy choices related to the treatment of noncooperation include two important features: type of sanction and sanction duration. Broadly speaking, there are two types of sanctions: (1) "full-family" sanctions, which lead to loss of the entire benefit during periods of noncooperation; and (2) "partial-family" sanctions, which only disqualify or remove the non-cooperating individual from the household benefit. Sanction duration refers to the amount of time a sanction lasts. As highlighted below, states' approaches to these critical dimensions of sanction policy often vary depending on whether the sanctions apply to the child care subsidy program or to SNAP.

Sanction policy for child support noncooperation for child care subsidy recipients

- **Type of sanction.** For child care subsidy recipients, noncooperation typically leads to a full-family sanction that results in the loss of the child care subsidy. However, the sanction varies in cases in which the custodial parents receive child care subsidies for children with different noncustodial parents. For example, in Michigan, if the custodial parent does not cooperate with child support, the entire child care subsidy is terminated. In contrast, Mississippi only terminates the child care subsidy for the children of the noncustodial parent for whom the custodial parent is determined to be in noncooperation.
- **Sanction duration.** In most study states, child care subsidy recipients remain ineligible for assistance until they resume cooperating with child support. Because of the full-family

sanction, families that have been sanctioned for noncooperation must reapply for services and verify cooperation with child support when they do so. Kansas implements a graduated sanction approach for child care subsidy recipients, starting with a minimum ineligibility period of three months that increases with each repeated incidence of noncooperation up to 10 years.

Sanction policy for child support noncooperation for SNAP recipients

State SNAP and child care subsidy sanction policies for noncooperation with child support vary by program.

- **Type of sanction.** For SNAP households, noncooperation with child support typically results in a partial-family sanction. Noncooperating SNAP recipients are removed from the household benefit while the other members of the household remain eligible and continue to receive a SNAP benefit.
- **Sanction duration.** Across study states, sanctions are closely tied to the period of noncooperation. Sanctioned SNAP recipients who re-establish cooperation ("cure" the sanction) have their SNAP benefits reinstated to the full benefit in the next available month after they begin cooperating. However, states have the flexibility to make sanctions more stringent. Michigan, for example, requires that the non-cooperating family member be removed from the SNAP case for a minimum of one full month.

CONSIDERATIONS FOR POLICY AND PRACTICE

Although this study is largely exploratory and limited to a small subset of states with "at state-option" cooperation requirements, several interrelated considerations relevant for policy and practice emerged from our discussions with state administrators.

Enhanced automated data systems and electronic interfaces. According to state respondents, having automated data systems supported the referral of recipients between programs and the ability to report key program outcomes. Though such data are critical for understanding and reporting on the actual or potential impact of cooperation requirements, most study states did not have them readily available.

Need for data to inform policy and improve program management. Most study states had limited ability to access data in a format that allowed staff at child support or assistance agencies to estimate the actual or potential impacts of cooperation requirements. For example, they could not easily assess the impacts on the number of referrals, cooperation status, and child support collections for cases that were referred to child support by the child care subsidy program and/or SNAP and were not also participating in TANF. The lack of federal reporting requirements related to cooperation requirements also reduces the need to have automated data systems that can run reports on this specific population. However, this information is important for estimating the extent to which extending cooperation requirements to the state child care subsidy program and/or SNAP might impact program outcomes, staff workload, and programs' ability to meet federal performance benchmarks.

Limited funding for automated data systems and electronic interface. State respondents emphasized that automated data systems and electronic interfaces are important for transmitting information between the assistance programs and the child support program. They noted the significant system and cost implications associated with developing, maintaining, and upgrading existing interfaces. Respondents' estimates of the cost of updating their data systems to facilitate an automated electronic interface ranged from $250,000 to over $1 million. To reduce system implementation costs, one study state coupled system updates with a broader initiative to align data systems involving different departments and programs. For example, the state was able to add child care subsidy program and SNAP interfaces to the data system used by the TANF program, which already interfaced with the child support program.

Planning for the implementation of a cooperation requirement. Study states with recent experience (since 2015) implementing a cooperation requirement in the child care subsidy program or SNAP emphasized the need for plenty of lead time and described engaging in an extensive planning process that focused on several key areas.

Modifying program-specific and automated electronic interface data systems. States emphasized the need for significant planning, involving both policy and technical staff, to identify and make necessary changes to their data systems to support communication between

Tips for facilitating implementation of cooperation requirements

- Use available data and create new reporting capabilities that cross public programs and estimate the potential impact of cooperation requirements on program participation and outcomes, staff workload, and the programs' ability to meet performance benchmarks.
- When possible, reduce costs of coordinated system development and interfaces by coupling system updates that support implementation of child support cooperation requirements with broader updates to data systems.
- To the extent possible, streamline policies and processes with other public programs for which a cooperation requirement already exists, including good cause.
- Provide a long design period for planning, developing, and testing system modifications and electronic interfaces.
- Slowly roll out cooperation requirements across the state to avoid system overload with new cases, and allow for adjustments in staffing to absorb increase in staff workload.

programs. Coordinating data systems required study states to devote time and resources to updating their data systems, if possible, or to create manual processes for sharing data. Even with substantial planning time for this part of the process, states still updated and adjusted their systems to account for real-time feedback during the initial rollout of cooperation requirements.

Aligning policies and processes. In planning for implementing new cooperation requirements, states sought to identify and align policies and procedures for referral, intake, and ongoing case monitoring across assistance programs to better coordinate and streamline the assistance application process and the cooperation determination process. For example, states aligned procedures by using consistent good cause exemption categories across programs.

Minimizing burden. States recognized that implementing a new cooperation requirement could result in increasing staff workload for all the involved programs. Child care and/or SNAP staff need to explain the cooperation requirement to applicants and recipients, complete the necessary referral steps, and process sanctions (or good cause exemptions) as necessary for non-cooperating recipients. This increases their workload, and for child support staff, those increases are associated with having more cases to work as a result of the cooperation requirement, and with spending more time communicating with the child care and/or SNAP program about the cooperation status.

Most states faced the challenge of handling workload increases with existing staff because they had little or no funding to hire more staff. Only one study state—Kansas—provided additional support to offset the anticipated increase in workload when it rolled out its new child care subsidy and SNAP cooperation requirements. Other states did not have additional staffing resources and had to absorb the increase in workload, which some states viewed as a challenge for their already strained systems. All of these study sites sought to reduce the initial burden on staff by rolling out cooperation requirements slowly, either by focusing on specific regions or by first requiring new applicants to cooperate and later expanding the requirement to current recipients.

DIRECTIONS FOR FUTURE RESEARCH

This work is an exploratory examination of child support cooperation requirements in light of increased interest in broadening their reach and impact in public programs. At a basic level, there is no single source of data to track states' use of cooperation requirements across public programs. To obtain a more complete picture of key policy features and continue systematic tracking of states' use of these requirements, future research efforts could compile information on the use of child support cooperation requirements across public programs over time in a single data source. A database of this type could also be used to track key policy features such as cooperation requirements for noncustodial parents, timing of cooperation assessment, good cause exemption categories and standards of proof, and sanction policies.

State and federal stakeholders want to know more about the impacts of cooperation requirements on each program's application rates, caseload size, performance benchmarks, and family and economic well-being. Both state- and federal-level stakeholders report that this information is critical for assessing the costs and benefits of expanding mandatory cooperation requirements. Across the study states, respondents reported that they would like to use the data they have available to try to estimate some of these key outcomes. However, across the study states, there is a lack of systematically collected data on child care subsidy and/or SNAP recipients who are required to cooperate with child support.

Due to data system limitations and competing priorities, assessment of outcomes related to cooperation requirements has been very minimal. Research using existing integrated state administrative data or matched data from child support, child care, and SNAP, could help answer these pressing policy questions.

Although this study provides a formative examination of cooperation policies at the state level, local-level practitioners could provide a deeper, more nuanced understanding of how cooperation requirements are implemented in the field. Collecting qualitative data at the local-level could capture variation in implementation practice across localities (such as urban versus rural areas) and from caseworker to caseworker.

Moreover, such data could further clarify and compare cooperation requirement policy and implementation practice within and across the SNAP and child care programs. Issues of interest that could be explored with local-level practitioners include the use of and challenges associated with relying on automated electronic interfaces to support communication between programs, variation in and best practices for good cause exemptions, and how sanctions for noncooperation are applied.

To further inform policy, future research could also examine the impact of cooperation requirements by collecting qualitative data from applicants, current recipients, and former recipients on their perspectives and experiences with these requirements. Such research could examine how applicants learn about cooperation requirements and how this information influenced their decision to participate in child care and/or SNAP. In addition, speaking with individuals about their decision to cooperate would shed light on how recipients from different programs weigh the advantages and drawbacks of cooperation with child support and the extent to which they feel child support services increase their family's economic well-being.

Child support cooperation requirements: building the knowledge base

To better inform policy discussion and development on the use of child support cooperation requirements, additional data collection and research is needed to:

- create and maintain a single data tracking source to compile information on the use of child support cooperation requirements across public programs over time;
- draw from existing integrated state administrative data or match state administrative data from child support, child care, and SNAP to learn more about the impact of cooperation requirements across multiple programs on child support outcomes, SNAP or child care subsidy participation, and family well-being;
- examine how cooperation requirements across multiple programs are implemented at the state and local level, including variation in caseworker practice, use of and challenges associated with automated electronic interfaces, enforcement of sanctions for noncooperation and best practices for good cause exemptions;
- explore how applicants and recipients of public programs learn about cooperation requirements, the trade-offs these requirements present for families, and whether the cooperation requirement influenced participation in SNAP, child care and other public programs.

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ENDNOTES

[1] Before PRWORA provided states the option to apply a child support cooperation requirement on SNAP recipients, states could (and still may) elect to remove individuals from their household SNAP benefit if they fail to perform actions required by certain federal, state, or local means-tested public assistance programs. This is known as a "comparable disqualification". Our study focuses on states that impose a specific cooperation requirement for SNAP recipients, and not on those that use comparable disqualifications.

[2] Recent efforts to reauthorize the Agricultural Act of 2014 (also known as "The Farm Bill") included a provision approved by the U.S. House of Representatives (H.R. 2) to remove the state option to require cooperation of SNAP recipients and make cooperation with child support mandatory for both custodial and noncustodial parents. In contrast, the Senate-passed version of the Farm Bill (S.3042) did not include a mandatory child support cooperation requirement for SNAP recipients. As of this writing, the Farm Bill lapsed because Congress was unable to reach a consensus before the reauthorization deadline.

[3] Maine is included in the count of states that require child support cooperation for SNAP recipients because it requires noncustodial parents who have child support orders to cooperate with child support as a condition of receiving SNAP, even though they do not require custodial parent SNAP recipients to cooperate with child support. Although Virginia law requires the referral of SNAP applicants to child support, it is not included in the count of states that have child support cooperation requirements for SNAP recipients because the law does not require cooperation with child support as a condition of SNAP eligibility.

[4] South Dakota and Maine established cooperation requirements for SNAP participants for the first time since 2015. However, both states have cooperation requirements for child care subsidy recipients that predate their SNAP cooperation requirements.

[5] In 2017, North Carolina passed a bill to pilot cooperation requirements for child care subsidy recipients in three to six counties. Beginning in February 2018, North Carolina implemented cooperation requirements in three counties. The pilot lasts through December 2018. In March 2019, the Division of Child Development and Early Education and the Division of Social Services will report to the Joint Legislative Oversight Committee on Health and Human Services and the Fiscal Research Division on the outcomes of the pilot, including costs and recommendations or challenges sustaining cooperation requirements long term.

[6] Mississippi has an electronic interface between the child support system and the SNAP program, allowing a determination of SNAP eligibility without verification of child support cooperation. However, there is no interface between the child care system and the child support system, which is why applicants must contact the child support office to obtain verification of cooperation.

[7] The Child Care and Development Block Grant Act of 2014 established requirements designed to provide more stability for families receiving child care subsidies, including a federal-level policy requiring eligibility redetermination periods of a minimum of 12 months—essentially providing continuous eligibility for families for a minimum of 12 months so long as their income does not exceed the federal income threshold and they do not experience a non-temporary change in work, education, or training that affects eligibility. In contrast, states previously had the authority to set redetermination periods and almost half used a six-month period.

[8] Across study sites, caseworkers were trained to not consider custodial parents to be non-cooperative if they truly lacked information on the noncustodial parent that was needed by the child support agency. For noncustodial parents, criteria used to determine noncompliance did not include an inability to pay child support or owing back child support.

Overview of child support cooperation data sources

Data collection for this exploratory study of child support cooperation requirements was conducted between December 2017 and June 2018 and included semi-structured discussions with federal and state-level stakeholders and a scan of publicly available databases on state-level child support cooperation legislation and policy. When possible, we triangulated data across sources.

The scan relied on three main data sources to identify the current status of states adoption of the cooperation requirements in SNAP and federally-funded child care programs:

- The National Conference of State Legislatures (NCSL) Child Support and Family Law Legislation Database, which covers passed, pending and failed legislation from 2012-2018 (http://www.ncsl.org/research/human-services/child-support-and-family-law-database.aspx)
- The CCDF Policies Database, which includes child care subsidy policies for the 50 states, the District of Columbia, and the US territories and outlying areas from 2009 through 2015 (https://www.researchconnections.org/childcare/studies/36581)
- USDA State Options Reports, the compilation of results of state surveys conducted by the Food and Nutrition Service on the use of various SNAP policy options from 2002 through 2018 (https://www.fns.usda.gov/snap/state-options-report)

In addition to these resources, we used information collected as part of a survey of IV-D child support directors conducted by The National Council of Child Support Directors in May 2018 to confirm information collected through our scan. The results of this survey are not publicly available.

Discussions with federal stakeholders included representatives from the Administration for Children and Families' Office of Child Support Enforcement, the Administration for Children and Families' Office of Child Care, and the Department of Agriculture's Food and Nutrition Service. To gain more insight into state-level policies, telephone discussions were conducted with IV-D child support directors and SNAP and/or child care subsidy program staff in eight states: Colorado, Florida, Kansas, Michigan, Mississippi, North Carolina, South Dakota, and Virginia. (We also conducted an interview with one county administrator.) These states were selected because they provided variety in which programs had the cooperation requirement (that is, SNAP-only, child care-only, or both), had cooperation requirements that had been in effect for differing lengths of time, and represented a mix of county-administered and state-administered child support systems.

All discussions were held with state-level administrators except in Colorado, where discussion included a county-administrator as well. Further insights into state experiences with child support cooperation requirements for child care subsidy recipients and SNAP participants were obtained through a meeting convened for this purpose at the National Child Support Enforcement Association Policy Forum in February 2018.

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