



# FOOD STAMP CHILD SUPPORT COOPERATION STUDY



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## Legislative Highlights

The following highlights summarize the Food Stamp Child Support Cooperation Study.

- Federal law gives states the flexibility to implement a range of food stamp eligibility options. These options range from a voluntary program to mandatory program. It appears Utah's existing food stamp eligibility requirements essentially function like a voluntary program for child support cooperation as the analysis showed 67.1% of food stamp recipient custodial parent households already had an open child support case in 2013.
- The options selected for an enhanced voluntary program may result in a range of impacts on the existing and future policy and program choices available to DWS. This change would not alter ORS practices. However, these agencies would experience significant impacts to systems and staff under a mandatory program. Complicating factors include the time it would take to implement necessary technological and system changes.
- If families received child support payments in 2013, they received \$72 less in food stamp benefits on average.
- An enhanced voluntary program functions as a middle ground between current practices and a mandatory child support program. Practical options for this include print and online information. It is estimated these would likely be less than \$25,000 for initial implementation, and then less than \$5,000 for annual maintenance.
- Under a mandatory option, it is estimated that 6.7% to 37% of families will experience reductions in food stamp benefits from sanctions while only 0% to 9% of families may receive child support payments. In other words the loss of income via food stamp benefits to these poor families will not be offset by the amount expected from child support payments.
- If selected, a mandatory program would require initial combined spending by ORS and DWS of \$3,202,807 to \$3,622,807 primarily for personnel and computer system enhancements.
- Custodial low-income parents are not confident an open child support case would produce additional income for their family. These parents have a common perception that the requirements of opening a child support case outweigh the benefits.
- The range of practical options includes: no change to current voluntary program, enhancement of current voluntary program, or a phased transition from a voluntary to a mandatory program based on obtaining predetermined improvements. Instant implementation of a mandatory option is not realistic.
- Nationally, for states, the choice appears to be a movement away from mandatory child support requirements.

## Executive Summary

During the 2014 legislative session discussions within the Social Services Appropriations Subcommittee regarding food stamp eligibility and child support requirements led to House Bill 02 which set aside funding for an independent analysis. The purpose of the study was to examine the potential impacts of a requirement of an open child support case and its relationship to food stamp eligibility. The University of Utah's Social Research Institute (SRI) was contracted to carry out the study. The study required responses to the following elements: 1) discussion of options for a voluntary program, 2) implication on systems and staffing, 3) analysis of relevant fiscal implications, 4) review of demographic data informing why individuals are currently not seeking child support, 5) review of phase-in options to implement; 6) inventory of other states currently availing themselves of this option, and 7) results following implementation of a similar policy with Temporary Assistance for Needy Families and Medicaid.

Evaluation steps taken by SRI's multidisciplinary team included:

- Examining relevant literature,
- Holding discussions with Office of Recovery Services and Department of Workforce Services staff,
- Conducting key informant interviews,
- Analyzing food stamp and child support participant data, and
- Reviewing secondary data from interviews with food stamp participants

The following highlights summarize each aspect of the required legislation.

It is clear, federal law gives states the flexibility to implement a range of food stamp eligibility options. These options range from a voluntary program to mandatory program. In Utah, food stamp cooperation requirements targeting non-custodial parents are not a viable approach. It appears Utah's existing food stamp eligibility requirements essentially function like a voluntary program for child support cooperation as the analysis showed 67.1% of food stamp recipient custodial parent households already had an open child support case in 2013.

The options selected for an enhanced voluntary program may result in a range of impacts on the existing and future policy and program choices available to DWS. This change would not alter ORS practices. However, DWS and ORS would experience significant impacts to systems and staff under a mandatory program. Complicating factors include the time it would take to implement necessary technological and system changes.

If food stamp recipients received child support payments in 2013, then their food stamp benefits were reduced by only \$72 per family.

An enhanced voluntary program functions as a middle ground between current practices and a mandatory child support program. Practical options for this include print and online information. It is estimated these would likely be less than \$25,000 for initial implementation, and then less than \$5,000 for annual maintenance.

Under a mandatory option, it is estimated that 6.7% to 37% of families will experience reductions in food stamp benefits from sanctions while only 0% to 9% of families may receive

child support payments. In other words the loss of income via food stamp benefits to these poor families will not be offset by the amount expected from child support payments.

If selected, a mandatory program would require initial combined spending by ORS and DWS of \$3,202,807 to \$3,622,807 primarily for personnel and computer system enhancements.

Based on qualitative data, custodial low-income parents are not confident an open child support case would produce additional income for their family. These parents have a common perception that the requirements of opening a child support case outweigh the benefits.

The range of practical options includes: no change to current voluntary program, enhancement of current voluntary program, or a phased transition from a voluntary to a mandatory program based on obtaining predetermined improvements. Instant implementation of a mandatory option is not realistic.

Nationally, for states, the choice appears to be a movement away from mandatory child support requirements. During the last 10 years, a total of 10 states have opted for a child support requirement for food stamps, but only 3 continue to maintain this policy.

During the last decade, Utah has been recognized as one of the best fiscally managed states in the U.S (Forbes, 2010, 2011, Yahoo Finance, 2012). This status has been attributed to a fiscally conservative view that is mutually shared by legislators, citizens, and those who prudently manage state agency budgets. Another contributing factor is the existing cultural influences that expect government programs to be structured in a way that maximizes resources for participants while minimizing requirements all the while emphasizing performance accountability.

Parallel with this focus on efficiency and effectiveness within government has been a national movement towards evidence-based approaches and best practices in public policy. A policy discussion during the 2014 legislative session and led to House Bill 02 including set aside funding for an independent analysis of the potential impact of a requirement of an open child support case and its relationship to food stamp eligibility. The legislation required the study to provide responses to seven related components of which the following report addresses in detail. All of the work which follows was conducted by a multidisciplinary team based at the University of Utah's Social Research Institute (SRI).

## Literature Review

### Food Stamps

The Food Stamp Program began as a small pilot program (1939-43) allowing low-income Americans to purchase food that the United States Department of Agriculture (USDA) considered surplus. In these early years, it was as much a farm price support program as an anti-poverty one. The program was phased out as food surpluses were depleted, and the concerns raised about the lack of congressional authorization and about highly publicized instances of fraud and abuse. In the years following, several attempts were made to re-establish the program, but it wasn't until 1959 that Congress passed legislation authorizing the USDA to again issue food stamps to low-income Americans.

UTAH	Reached <b>9%</b> (1 in 12 persons)	almost <b>80%</b> of all food stamp participants are in families with children	more than <b>17%</b> of all food stamp participants are in families with elderly or disabled members	almost <b>52%</b> of all food stamp participants are in working families
NATIONALLY	Reached <b>15%</b> (1 in 7 persons)	more than <b>70%</b> of all food stamp participants are in families with children	more than <b>28%</b> of all food stamp participants are in families with elderly or disabled members	more than <b>42%</b> of all food stamp participants are in working families

(CBPP, 2013)

However, during both the Eisenhower and Kennedy administrations the program struggled with full implementation nationally. It wasn't until Congress passed the Food Stamp Act of 1964 at the urging of President Lyndon B. Johnson that the modern food stamp program began. It is a



jointly administered program, with the federal government setting national program standards for eligibility and benefits, funding 100% of all benefits and approximately half of state administrative expenses. The state takes the lead monitoring program implementation and interacts with program participants by certifying their eligibility and issuing benefits.

The Food Stamp Program, now called SNAP (Supplemental Nutrition Assistance Program) in most of the nation is designed to increase the food purchasing power of eligible low income households to a point that ensures they can buy a nutritionally adequate low cost diet. The scientific evidence behind the program is clear; food stamp participation improves dietary quality (Hartline-Grafton, 2011), protects against obesity (Skelton 2009, Ali 2011), and improves health (Nord and Prell, 2011), especially among children. The program was most recently authorized by the 2014 farm bill (Agricultural Act of 2014; P.L. 113-79). Last year, 47.6 million individuals received food stamp benefits each month in the U.S. Almost half of those people were children (23 million). In fact, about 70 percent of SNAP benefits go to households with children.

Nationally, the number of food stamp recipients has been on the rise. Data from the USDA's Food and Nutrition Service indicates those served in FY 2013 was up from nearly 45 million in FY 2011 and 21 million in 2003. Total FY 2013 costs reached over \$76 billion in benefits, over three times the cost of benefits in FY 2003 (USDA, 2014).

Not all eligible individuals choose to participate in the food stamp program. According to estimates from a report by Mathematica Policy Research (2013), 73 million individuals in 36 million households were eligible for food stamps in FY 2013, indicating the program is reaching roughly 65% of those who qualify. Among those who did receive food stamp benefits in FY 2013, an estimated 41 percent were children, 10 percent were elderly people, and another 10 percent were disabled nonelderly people. Food stamp participants lived in poverty: 83 percent had a gross income at or below the USDA poverty guideline and 42 percent had a gross income at or below 50 percent of the poverty guideline.

<b>TABLE 1: Food Stamp Eligibility Requirements</b>
Gross income must not exceed 130% of the federal poverty guidelines; Net income may not exceed 100% of the federal poverty guidelines; and Personal resources must not exceed; \$2,000 for most households; or \$3,000 for households of two or more persons, provided at least one person is 60 years of age or older. Food Stamp recipients must meet TANF work requirements.

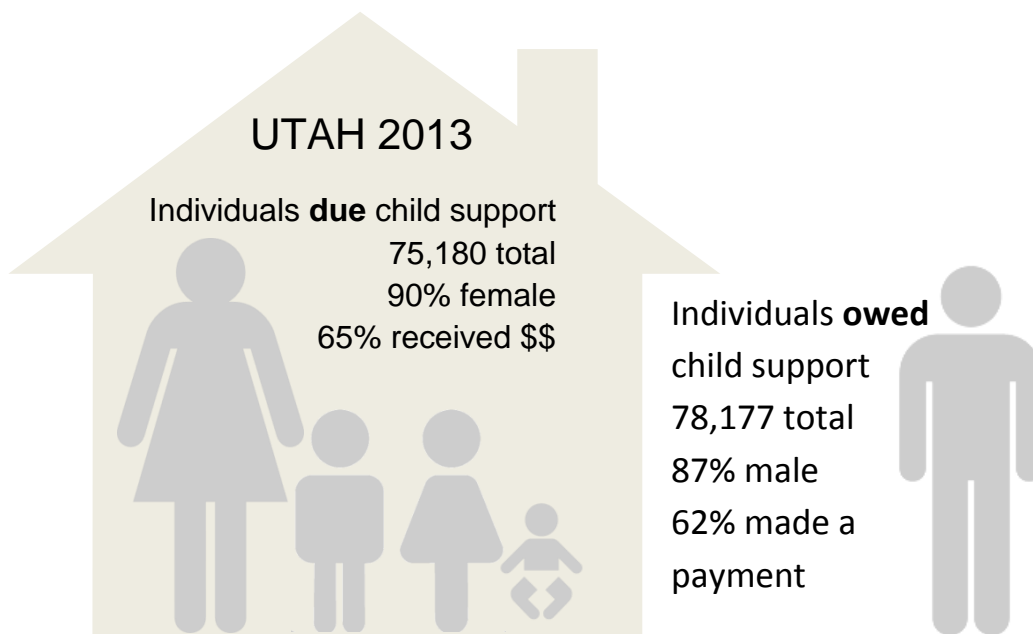
To be eligible for food stamps, most households without elderly or disabled members must have the following: gross income at or below 130 percent of the U.S. Department of Agriculture (USDA) poverty guideline, net income after allowable deductions at or below 100 percent of USDA's poverty guideline, and countable assets at or below \$2,000. Households that do have elderly or disabled people are exempt from the gross income limit and may have up to \$3,250 in countable assets. The specific benefit is calculated by subtracting 30 percent of a household's net income from the maximum benefit allowed for that household's size and location.

Fortunately in Utah with the recent economic improvements, the number of residents receiving food stamps has bucked national trends and is declining. Even so the program continues to ease the burden of those having to choose between buying enough food and meeting other needs such as housing, clothing, and health care. Specifically, the program helps people buy food by providing grocery credit through the use of the Utah Horizon card, which acts as a "debit card" to buy groceries and cannot be used to purchase pet foods, cigarettes, paper products, alcoholic beverages, household products, or hot "ready-to-eat" food. Recipients do not pay Utah's sales tax on food when using the card.

In the past, cases of fraud and overpayment have been a lightning rod for the national media when it came to the food stamp program. However, as far back as the early 2000's this program has implemented extensive systems to ensure payment accuracy. The food stamp quality control system requires states each month to select a representative sample of cases and have independent state reviewers check the accuracy of the state's eligibility and benefit decisions within federal guidelines.

In Utah, the Department of Workforce Services (DWS) administers the food stamp program and places strong emphasis on achieving and maintaining low error rates as a performance measure for accountability. This has been aided through technological enhancements to the eligibility screening system and introduction of electronic document management systems, both of which can limit human error. Additionally there has been greater and more efficient use of electronic data matching to verify information that households provide. Finally, states like Utah have focused on improved "business processes" to more efficiently manage the entire food stamp application / certification process (Interview, 2014).

As a result of these types of enhancements in service delivery locally and across the nation, the percentage of food stamp benefit dollars issued to ineligible households or to eligible households in excessive amounts fell for the seventh consecutive year in 2013 to 2.61 percent, the lowest rate since USDA began measuring error rates in 1981 (CPPB, 2014)



## Child Support

Actions to support child support enforcement were conceptualized when the Social Security Act was established in 1935 on the heels of the Great Depression. This act officially established financial Aid to Families with Dependent Children where a parent, often the father, was either disabled or deceased. If a state developed a plan to provide aid to families meeting certain requirements, the federal government would provide the funds for these needy people. Although the congressional intent was to assist families where a parent was deceased or disabled, a family in which a parent was absent and not supporting the children also met the criteria for welfare eligibility.

It took 15 additional years for Congress to pass the first federal child support enforcement legislation and then in 1968 a new act provided a legal basis for enforcing child support orders when the parents resided in different states. A few years later Congress amended the Social Security Act to add Title IV, Section D, the Family Support Act that required any state receiving federal welfare funds to create a single agency that would locate absent parents and establish and enforce child support obligations.

The next significant legislation, “the Deadbeat Parents Punishment Act”, was passed in 1992 to address nonpayment of child support in interstate child support cases. Under this law, a case may become a federal offense if it can be shown that a noncustodial parent willfully failed to pay a past-due support obligation, with respect to a child residing in another state. A year later, the Omnibus Reconciliation Act of 1993 set new paternity establishment performance standards for state child support enforcement programs.

Finally, Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), which was commonly referred to as “welfare reform.” This amendment substantially increased each state’s child support enforcement responsibilities and powers. The act replaced AFDC with Temporary Assistance for Needy Families (TANF) and established a direct correlation between the amount of federal funds a state receives for its needy families and the state’s performance in child support enforcement. As a result, all states receive a block grant to fund the TANF programs. To be eligible for a TANF block grant, a state must operate a child support enforcement program meeting federal requirements. Also, states can receive additional incentive funding depending upon their collections and performance levels (Wilson, 2011).

Child support legislation was developed mainly to apply to families with divorced fathers working full time (Sorensen and Lerman, 1997). Qualitative studies suggest that legislation framed with this model in mind creates issues with the social and economic situations of many low-income parents. In particular, the rules of child support and welfare agencies interact so that parents often find it difficult to comply with them, even when they wish to do so (Waller & Plotnick, 2001, p. 90).

While individual states differ administratively in the way child support programs are operated federal requirements insist on several core functions which are listed in the following table. Examples of some of these variations include some child support payments being handled through courts or private attorneys. In this situation, arrangements are separate from state child support programs, although some state programs process all child support payments in the state.

Also, it is worth noting that child support programs typically do not provide services related to child custody, visitation, or property distribution. Some programs collect alimony when it is included as part of the child support order and some states are involved in facilitating limited access and visitation programs. Finally, any parent or person with custody of a child also referred to as “a duty of support” (DOS) can apply for services from the state child support agency.

<b>Minimum State Child Support Requirements</b>
Locating noncustodial parents
Establishing paternity
Establishing child support orders
Enforcing child support orders (collecting support owed)
Distributing child support
Reviewing child support orders periodically and modifying them when appropriate

(NCSL, 2002)

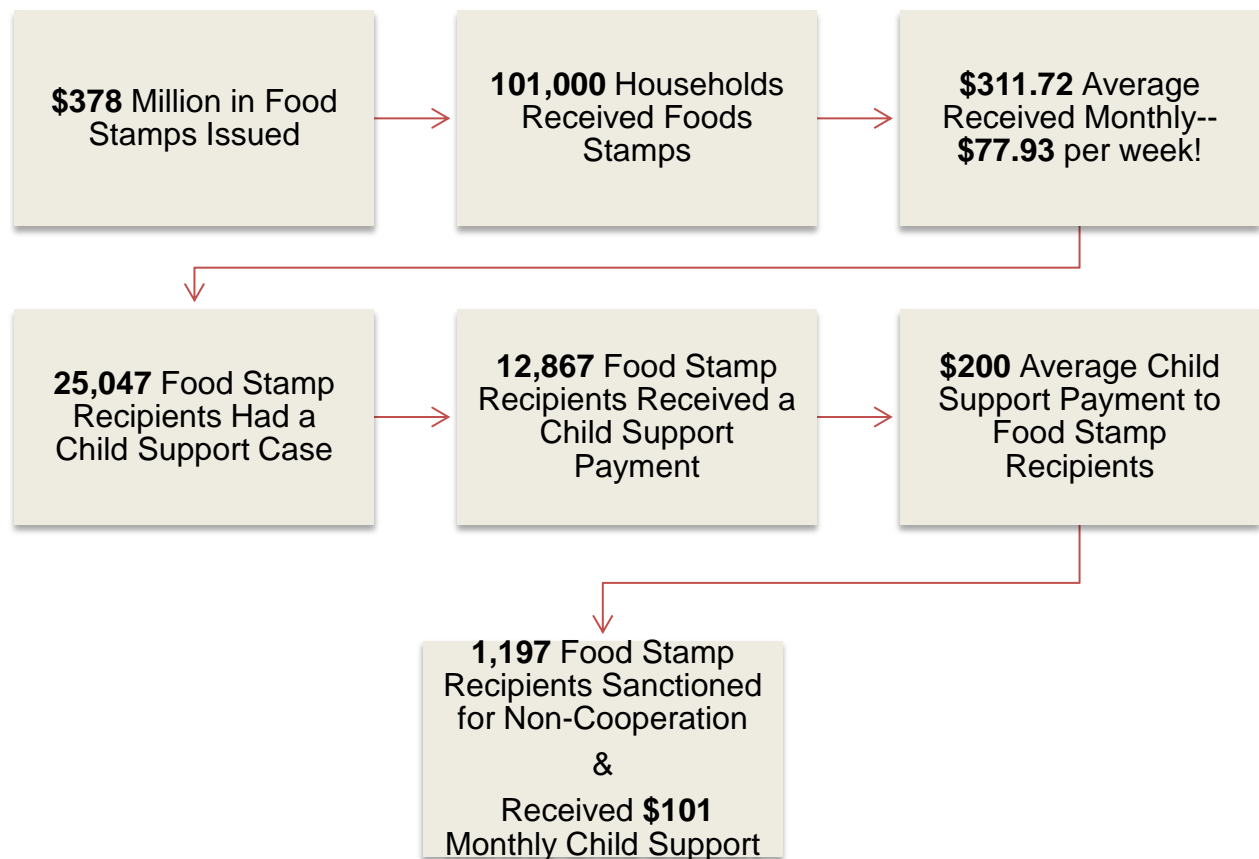
In Utah, the Office of Recovery Services (ORS) provides child support services under the Federal/State IV-D Child Support Program. These services are provided to people who: 1) receive cash assistance or Medicaid from the Department of Workforce Services (DWS) or the Department of Health (DOH); 2) are no longer receiving cash assistance or Medicaid but continue to receive child support services; 3) apply directly to ORS for IV-D child support services; and 4) are referred to ORS while children are in state custody.

For purposes of this study, those who pay child support will be referred to as “non-custodial parents” and those who receive support will be referred to as “custodial parents.” In addition, custodial parents will be referred to as “she” and non-custodial parents as “he” since this is most often the case. However, a custodial parent can be male and a non-custodial parent can be female.

By definition, to be in compliance means making a “good faith effort” to cooperate and requires providing truthful and correct information about the non-custodial parent and a number of other details including: answering case-related questions; providing copies of orders and the child support worksheets; appearing at interviews and at administrative or court hearings; and submitting to genetic testing, etc. Before welfare reform, public assistance agencies solely determined how to deal with clients who failed to cooperate. Now, ORS determines if a client has not cooperated and DWS is required to impose a sanction such as reducing the family’s assistance (Roberts, 2005). In contrast being deemed “noncooperative” usually means the client has not provided the required information needed by ORS and for the purpose of this report, specific information about the non-custodial father (s) including: social security number, current address, current employer, and telephone number.

The law however, provides one exception to these requirements which is referred to as “good cause”. In this situation, custodial parents can be excused from providing the key information about the father (s) if you have good cause for not doing so. There are specific reasons for allowing a good cause exception and they include: child was conceived as the result of rape or incest; adoption proceedings for the child are underway; a discussion with a formal adoption agency about placing the child has not gone on for longer than three months; disclosing the

father's whereabouts would result in physical or emotional harm to the child or would cause emotional or physical harm to the custodial parent. In Utah in order to obtain a "good cause" exception the client must provide good cause evidence within 20 days from the date of the claim. Evidence such as police reports, medical, or child protective records are often sufficient.



## Sanctions

Federal law establishes minimum sanctions but gives states broad authority to increase and extend sanctions with the policies that they establish. Specifically, federal law requires states to reduce TANF benefits for families who do not adhere to work responsibilities or do not cooperate with child support enforcement. For such noncompliance, states must impose partial sanctions on TANF benefits lasting as long as the noncompliance or face financial penalties themselves. States may choose stricter sanctions and terminate the family's benefit, which are referred to as full-family sanctions—for noncompliance with work and child support responsibilities. States can also impose sanctions for noncompliance with other TANF responsibilities, such as immunizing children and school attendance.

Similarly, states may also limit Medicaid and food stamp benefits for certain family members who do not comply with TANF requirements. Specifically, states may end Medicaid benefits for adults whose TANF benefits are eliminated for noncompliance with work responsibilities. Medicaid benefits for children and pregnant women, however, are protected under federal law and cannot be altered by state policy decisions.

Limited information is available on the characteristics of families who received sanctions and on what happened to them afterward. The General Accounting Office examined a number of state based studies and indicated families who received sanctions were less educated or faced more problems in complying with work responsibilities than TANF families who did not receive sanctions. However, for approximately one third of these families, the sanctions seemed to serve their intended purpose, bringing the families back into compliance within a few months. Another multi-state analysis found that family members who received full-family or partial sanctions were more likely to have dropped out before completing high school than those who did not receive sanctions. Limited work experience and lengthy periods of receiving welfare benefits were also more characteristic of sanctioned families. Earlier studies identified barriers to compliance, such as problems with transportation, child care, and health, as significant factors contributing to being sanctioned. In yet another study involving 10 states, researchers found that an average of about one-third of family members came back into compliance after receiving partial sanctions or returned to TANF after receiving full-family sanctions. Most did so within a few months of receiving a sanction. (GAO, 2000)

### Our Charge

The Utah State Legislature passed HB 02 during the 2014 session which includes the following intent language: The Legislature intends the \$70,000 in new funding provided for the Independent Study Requiring an Open Child Support Case as a Condition of Food Stamps Eligibility to the Department of Human Services and requires that the independent study be provided to the Office of the Legislative Fiscal Analyst no later than September 1, 2014. The study shall include a(n): 1) discussion of options for a voluntary program, 2) implication on systems and staffing, 3) analysis of relevant fiscal implications, 4) review of demographic data informing why individuals are currently not seeking child support, 5) review of phase-in options to implement; 6) inventory of other states currently availing themselves of this option, and 7) results following implementation of a similar policy with Temporary Assistance for Needy Families and Medicaid.

### Methodology

SRI's multidisciplinary team followed a straightforward approach to conducting this study beginning with an initial planning meeting with key DWS and ORS stakeholders as well as the legislative fiscal analyst, to whom the final report is due. The first step was to establish a work-plan detailing the required components of each study element. Next the SRI team conducted a literature review of food stamps, child support, economics of food stamps and child support, compliance sanctions, and status of public assistance programs in Utah. Concurrent with the literature review and discussions with key stakeholders in ORS and DWS, evaluation staff created an online survey to assess the status of food stamp child cooperation support policies in other states.

Following additional meetings with agency stakeholders, SRI staff requested specific data from both DWS and ORS. Additionally, SRI staff developed and conducted semi-structured key informant interviews with agency personnel and public advocacy representative. Given SRI's history and experience studying various aspects of the TANF population in Utah, evaluation staff utilized previously collected data from 2012 and 2013 interviews to fulfill one component of the work-plan.

Once the requested queries were performed by DWS and ORS analysts, SRI staff conducted secondary analysis. Following these preliminary analyses additional meetings and conversations were held with agency stakeholders to review findings and ensure data integrity. These meetings and discussions provided important context to the data for the SRI team, which allowed the evaluators to proceed with additional analyses.

The report which follows summarizes each component of the required legislation. The only significant limitation to the study is that the analyses are based on data from calendar year 2013.



## SECTION 1. Discussion of Program Options

### Highlights

- ✓ Utah's existing food stamp eligibility requirements function as a voluntary program for child support cooperation.
- ✓ Federal law gives states the flexibility to implement a range of food stamp eligibility options from voluntary to mandatory.
- ✗ Food stamp cooperation requirements targeting non-custodial parents are not a viable approach for Utah.

Current duty of support requirements in Utah fall under a definition of a voluntary program for food stamp eligibility: families have the option to open a child support case, but are not sanctioned if they choose not to. **The report will differentiate between the existing option which operates essentially as if it were a voluntary program and a new option. This new version would be an enhanced voluntary program** that includes increased efforts toward public outreach and education. A third option would be a mandatory program which represents a significant policy change.

Child support cooperation requirements exist in a variety of public benefits programs. For the most part, these requirements apply to custodial parents or others who have the legal ability to assign support rights to the state and cooperate with the state in pursuing those rights. By federal law, state options to impose a child support cooperation requirement can apply to either custodial or non-custodial parents who receive food stamps. The state program may impose such requirements on only custodial parents, only non-custodial parents, or both. This authorization for a child support cooperation requirement for both custodial and non-custodial parents does not apply to TANF or Medicaid, but is only found in the food stamp program.

Since most low- income, single parent families participate in multiple programs, families can face multiple cooperation requirements. Because the standards for judging cooperation can vary from program to program, and the criteria for claiming a good cause exception also vary from program to program, it is possible for the head of a household to face varying, and sometimes seemingly inconsistent program rules. This can lead to confusion and cause those in need to go without assistance to obtain food, shelter, and health care.



State options for food stamp eligibility requirements under federal guidelines include sanctions for noncustodial parents. However, these options are not viable for Utah. Noncustodial options would require extensive restructuring of ORS, as this would require a complete change in agency priorities. In addition, multiple complications would arise including the inability to track cooperation with child support services across states and countries. Under the current food stamp and child support recovery systems in Utah, these options would rely on the willingness of noncustodial parent applicants to provide accurate, honest information to substantiate eligibility claims. **Current food stamp and child support recovery policies make the noncustodial options unfeasible.**

If a state imposes a child support cooperation requirement on either parent, it may limit the requirement to certain classes of individuals. For example, a state might choose to impose a child support cooperation requirement only on custodial parents who do not receive TANF assistance. Alternatively, it might apply the requirement to all custodial parents receiving food stamps. If the latter option is applied, then custodial parents who receive TANF will have child support cooperation requirements for both food stamps and TANF programs (Roberts, 2005).

If the state adopts a child support cooperation requirement for custodial parents and noncustodial parents, it must define what it means by “cooperation.” The federal regulations do not provide specific guidance on this issue. They do specify that if a state takes up this option, it must notify all individuals who are subject to this requirement in writing at the time they apply and at reapplication for benefits.

If the individual subject to the cooperation requirement is receiving TANF or Medicaid and has already been determined to have a “good cause” for not cooperating, then the food stamp cooperation requirement is met. Federal regulations further specify the custodial parent who is subject to the cooperation requirement (and does not have good cause for refusal to cooperate), be referred to the state child support enforcement agency and that the agency may not charge fees or costs for its services. If an individual is found to be uncooperative, that individual is disqualified from receiving food stamps. Further, the disqualification lasts until the individual cooperates. However, during the sanction or disqualification period, the rest of the household does continue to receive assistance. Additionally, disqualified member’s resources and his/her income remain a part of the calculation in determining the household’s eligibility and benefit.

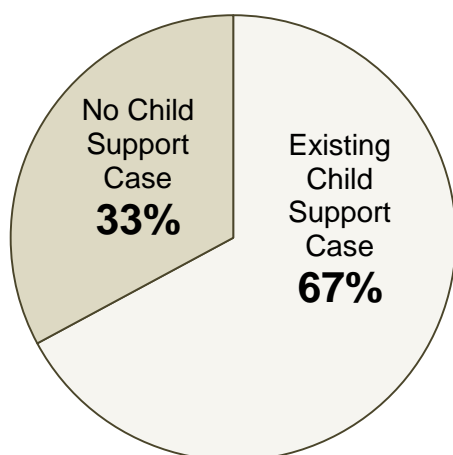
## SECTION 2. Implications on System and Staffing

### Highlights

- ✓ 67.1% of food stamp recipient custodial parent households already had an open child support case in 2013.
- ✗ The options selected for an enhanced voluntary program may result in a range of impacts on the existing and future policy and program choices available to DWS. This change would not alter ORS practices.
- ✗ DWS and ORS would experience significant impacts to systems and staff under a mandatory program. The time it would take to implement necessary changes is a major consideration.

### Current Food Stamp & Child Support Trends in Utah

**37,307 One-Parent & Stepparent  
Food Stamp Households,  
Utah CY 2013**



Like most of the nation, Utah has experienced declines in food stamp participation annually since 2010 (United States Department of Agriculture, Food and Nutrition Service, 2014). This trend is expected to continue given that Utah is experiencing economic growth and low unemployment rates. Single-parent household food stamp participation is not expected to drop at the same rate as other populations because of their relatively high vulnerability to food insecurity (United States Department of Agriculture, 2014). DWS reports that there were 37,307 existing food stamp cases where only one parent or stepparent resided in the home in CY 2013. A DWS and ORS case match revealed that during that year, there were 25,047 ORS cases that consisted of food stamp recipients. It can be interpreted that

67.1% of food stamp recipient households headed by custodial parents have sought a child support case through ORS, while 32.9% have not.<sup>1</sup>

<sup>1</sup> Data limitations do not allow for the inclusion of custodial parent households that are not one-parent or stepparent homes. While these households exist (e.g. custodial grandparents, etc.), they do not make up a significant portion of cases, and their behavior is expected to follow that of stepparent and one-parent households.

Data limitations restrict what is known about the 12,260 food stamp recipient, custodial parent households that did not have an existing case with ORS in CY 2013. What is known is that single-parent households are among the poorest groups in the state, and tend to have corresponding low-income noncustodial parents (BYU Center for Economic Self-Reliance, 2008; United States Census Bureau, 2012; Waller & Plotnick, 2001). **The current ORS data system does not entail tracking or sanctioning of food stamp families for non-compliance.** So, it is difficult to know why these families have not pursued child support through ORS. Possible reasons that the 12,260 food stamp recipient custodial parents in question have not participated with ORS because: they are the most unlikely group to receive child support, prefer an informal child support agreement,<sup>2</sup> have “good cause” not to open a child support case, or are unaware of the benefits of doing so.<sup>3</sup>

The information that follows will support decision-makers in determining whether a policy shift will compel custodial families receiving food stamps to open a child support case with ORS. Policy rule changes are implemented to gain specific results; these outcomes can usually be categorized into two groups: 1) a change in behavior of a certain group in order to benefit society, and 2) expanded government efficiency. These considerations are not mutually exclusive and this section, as well as Section 3, is meant to inform those interested in either or both outcomes. The discussion here focuses on non-financial implications for DWS and ORS and is supported by financial analyses in Section 3.

#### Option: Enhanced Voluntary Program

Although present food stamp eligibility practices represent a version of a voluntary program, increased efforts could be made to encourage greater participation with ORS. The report holds the notion that an enhanced voluntary program consists of a proactive public outreach campaign as opposed to the status quo. The purpose of this type of program is to reach the 12,260 food stamp recipient custodial parents that do not have an ORS case. Unlike a mandatory program, a voluntary option would allow for outreach to custodial and noncustodial parents through similar methods. DWS would be responsible for the majority of outreach implementation.

#### Department of Workforce Services

Efforts to increase public outreach to food stamp participants about ORS services would be made by DWS. Effective methods to inform this audience would include education about who is eligible to open an ORS case, how to open a case, the process that unfolds once a case is open, and what results can reasonably be expected. In addition, applicants should be made aware of the

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<sup>2</sup> Generally, a proportion of families have informal child support agreements. The qualitative analysis performed for this report about why some Utah families do not open a case with ORS demonstrated that there are custodial families that believe opening a child support case will reduce the child support they receive because non-custodial parents will cutoff informal support and formal support will not be recovered. Informal child support is not explored in much of this report because of the inability to accurately estimate quantifiable figures for it.

<sup>3</sup> See section 4 for a qualitative analysis of why Utah families do not seek child support through ORS.

possible benefits from a child support case (e.g., establishing paternity, potential income increases, medical coverage for children, increased father engagement, etc.). Enhancing public outreach to promote a voluntary program could take multiple forms, each with differing impacts on DWS. The options are detailed below; associated costs are discussed in Section 3.

1. Print and distribute materials including brochures or other paper handouts. DWS would need to compile the necessary information, have the materials printed, hand them out to relevant participants, and display them in noticeable and accessible areas. Translated versions should be made available as needed.
2. Provide online information. The organization would have to design and post information on their website. Additionally, the organization could include this information in the online application process as is done with TANF and Medicaid. This would require some technical changes to the system, but since the connections already exist, the effort involved would be minimal.
3. Institute face-to-face or telephone interviews. Over the past twenty years, the organization has moved toward the elimination of unnecessary in-person or telephone interviews through electronic management of cases. This movement has allowed DWS to significantly increase per worker caseloads and has bolstered efficiency. According to key informant interviews, the introduction of an interview process would eliminate the ability of DWS to continue the current pursuit of these practices. Re-implementing face-to-face interviews would reverse the automation process made by DWS. Similarly, requiring telephone interviews would hamper the agency's efforts to build upon the recent pattern of focusing on increased efficiency. This is explored further in Section 3 of this report.
4. Facilitate in-person workshops and classes. DWS would need to design, organize, promote, and conduct regular workshops for the public. The organization already provides job seeking, life skills and relationship classes. This indicates facilitation is feasible; however, key informant interviews indicate that workshops and classes are not worthwhile for a voluntary option because of the likelihood of low attendance. Starting October 1, 2014, DWS is beginning a project to attempt to increase participation in required employment workshops. This project will provide understanding about how DWS can successfully initiate public outreach programs. The project will involve an evaluation that will inform the success of these options.

The responsibilities of instituting the alterations needed for the type of voluntary program discussed here would fall to DWS. The effects would vary with the options chosen. **Overall, points one and two from the preceding list of enhanced voluntary program options would not require additional DWS staff or training, and do not involve substantial technical changes.**

## Office of Recovery Services

According to key informant interviews, ORS would likely experience a small impact on its system and staffing if an enhanced voluntary program were employed. In contrast to a mandatory program, this option would not require client tracking, so major technological changes would not be necessary. A voluntary program might increase ORS cases since more people would better understand the child support recovery process and its benefits. While this could intensify caseloads, or require additional workers, current data do not allow for an estimate of how many food stamp families would voluntarily open an ORS case. It is known that about 67.1% of this population has already done so. This leaves between 0 and 12,260 families that could open a case.

The number of new ORS cases would depend on the success of public outreach and education. It is assumed that there is a portion of custodial parents that would open an ORS case if they had more information about the program. However, how many people make up this population cannot be estimated with available data.

### Option: Mandatory Program

## Department of Workforce Services

DWS would need to invest further efforts into working with all custodial parent households under a mandatory option and this would require additional workers and technological enhancements.<sup>4</sup> Estimates for additional workers evolved through the course of this study. Original estimates were based on 33,360 single-parent households that would need to cooperate with a food stamp duty of support requirement. These estimates were later updated and excluded TANF and Medicaid participant families because they faced a duty of support requirement through these programs. The new estimates also included stepparent families and resulted in a figure of 37,307 households that would be required to open a case with ORS. This would present additional work for DWS and necessitate 1.65 additional full-time employees.<sup>5</sup> Additionally, this choice would require DWS to update their computer system which will take about 680 hours to implement. The time involved for system changes is a primary consideration for a mandatory program. Key informant interviews indicate that other factors (e.g. employee training) would not be significantly altered from a mandatory option.

DWS could encourage cooperation through public outreach under a mandatory program as it would for a voluntary one; the same options and impacts would typically apply as discussed in the voluntary option explanation in this section. **It should be recognized that a mandatory program could not include stricter requirements to food stamp applicants than what is listed under federal guidelines**, such as mandating participation in classes or workshops.

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<sup>4</sup> See DWS cost estimates in Appendix B.

<sup>5</sup> See Appendix C for calculations.

## Office of Recovery Services

According to ORS estimates, a mandatory requirement would entail considerable technical and staffing changes. System expansion is needed because ORS will have to track all custodial parent food stamp participant households for compliance; this update will require 14,000 to 20,000 hours of work. Like DWS, the necessary time needed for ORS to implement system and organizational changes is a major factor that warrants attention when considering a mandatory program. As with DWS, original estimates for ORS were revised to remove families that are already required to file for a child support under TANF and Medicaid and to incorporate stepparent households. These revised estimates indicate that 12,260 households would be required to open an ORS case, which would necessitate 18 additional employees. As with the enhanced voluntary program, training needs would be insignificant.

ORS reports a recovery rate of 59.1% for families that do not receive public assistance benefits. For CY 2013, ORS reported a recovery rate of 29.5% for TANF participants. TANF and food stamp recipients are comparable for the sake of estimating recovery rates because they share similar low-income, employment status and demographic characteristics. Requiring food stamp participants to open a child support case will likely lower average ORS recovery rates. This could influence ORS receipt of federal awards, and this will be discussed further in Section 3.

## SECTION 3. Analysis of Relevant Fiscal Implications

### Highlights

- ✓ If families received child support payments in 2013, they received \$72 less in food stamp benefits on average.
- ✓ Practical options for an enhanced program that maintains the voluntary nature of current practices would include the design, print and distribution of informational materials and publishing of online information. Costs and efforts would be insignificant and would likely be less than \$25,000 for initial implementation, and then less than \$5,000 for annual maintenance.
- ✗ Food stamp recipient custodial households tend to correspond to poor non-custodial parents; although food stamp participation is declining in Utah, single-parent households are expected to require continued assistance from this program.
- ✗ A mandatory program would require initial spending of \$3,202,807 to \$3,622,807.
- ✗ Under a mandatory option, it is estimated that 6.7%-37% of families will experience reductions in food stamp benefits from sanctions while only 0%-9% of families may receive child support payments.

As noted in Section 2, policy rule changes are often implemented to benefit society while promoting government efficiency. This section examines fiscal outcomes for Utah families, state organizations, and federal budgets. The purposes of a duty of support requirement for food stamps might include: to increase non-custodial responsibility to their families, to promote self-sufficiency of custodial parent households, and to advance efficiency in public assistance practices. The information presented allows for the assessment of the practicality of a cooperation requirement under each of these aspects.

### Financial Trends for Food Stamps & Child Support in Utah

In 2013, Utah households received \$377,903,214 in food stamp benefits (United States Department of Agriculture, Food and Nutrition Service, 2014). This accounts for 0.5% of federal spending on food stamps, while the state's population makes up 1% of the nation (United States Census Bureau, 2014); as noted, Utah has experienced a tendency for food stamp participation to



decline and this is expected to continue in the short and medium run (United States Department of Agriculture, Food and Nutrition Service, 2014). However, low-income custodial parent households are those most likely to continue to rely on public assistance benefits, so their participation in the food stamp program is not expected to decline much.

DWS and ORS data matches report a median monthly food stamp benefit to custodial parent families that had an existing case with ORS in CY 2013 of \$383.<sup>6,7</sup> Households that received any child support payment during the year had a median benefit of \$377 per month.

In 2011, the average total income for families that were awarded, but did not receive, child support was \$15,071.00 (United States Census Bureau, 2012). While Utah generally has a higher household income than the rest of the nation, it also usually has a lower per capita income (United States Census Bureau, 2014). The trend of higher household income for Utahns is not likely representative of food stamp recipient custodial parent households because the average household size of families that received food stamps and had an existing child support case in Utah CY 2013 was small<sup>8</sup> and larger households generally receive a greater portion of income in the state (Krantz, 2012). Evidence suggests that food stamp recipient custodial parent households in Utah are expected to have similar income as suggested by national trends.

While on average, one-parent households received an income of under \$16,000 per year in 2013, the annual income threshold for food stamp eligibility for a family of three was \$32,654 (State of Utah). ORS data reveal that the median child support payment received by food recipient families was \$200.00. Average food stamp recipient families receive child support payments 59% of the year (United States Census Bureau, 2012). Additional food stamp families that open a case with ORS are expected to receive a maximum of \$1,416<sup>9</sup> per year in child support payments, while they need over \$17,000 to no longer be eligible for food stamp benefits.

### Option: Enhanced Voluntary Program

#### Department of Workforce Services

A voluntary program that goes beyond the status quo would include heightened public outreach and result in extra costs to DWS. However, the costs for the methods predicted as most effective given DWS's current structure and developments would be minimal and include: design and printing of educational materials, one-time costs to link existing connections to electronic food stamp applications, and one-time costs to implement online information.<sup>10</sup> This option would not require expenditure for computer system enhancements or substantial personnel costs as would the mandatory option as described later in this section.

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<sup>6</sup> The median is utilized in this report when skewed data diminish the relevancy of the mean.

<sup>7</sup> This represents the amount recipients received over the year divided by twelve months. Custodial families with an ORS case generally receive food stamp benefits eight to ten months out of the year. This indicates that on average, monthly food stamp benefits might be higher than reported above, but that there are some months that households receive no food stamps.

<sup>8</sup> Generally 3 people (e.g. one adult and 2.5 children) as per DWS and ORS data match for food stamp recipients CY2013.

<sup>9</sup> Median child support per month multiplied by 60% of months  $\Rightarrow \$200 \times (12 \times .59) = \$1,416$  per year

<sup>10</sup> See Section 2 for more details.



TABLE 2: Options & Costs to DWS for a Voluntary Program Options to Enhance Public Outreach	
Practical	Impractical
<p>OPTION 1: Print and distribute informational materials.</p> <p>COST: \$13,000 for the initial year, and \$5,000 per year after.<sup>11</sup></p>	<p>OPTION 3: Conduct telephone or in-person interviews.</p> <p>COST: \$1,875,250 per year in opportunity costs.<sup>12</sup> Locking DWS into telephone interviews will overturn the current pursuit of efficiency efforts that would eliminate about \$1.8 million in annual costs.</p>
<p>OPTION 2: Provide online information.</p> <p>COST: A specific figure cannot be estimated for this, but it will represent insignificant costs and efforts. This simply entails utilizing existing connections to add a link to the online application and posting information on the DWS website.</p>	<p>OPTION 4: Facilitate in-person workshops or classes.</p> <p>COST: While this is a low cost option, it will likely not be effective. This option should be explored once the fall 2014 project and evaluation mentioned in this report are complete.</p>

See Section 2 for related discussion on the above DWS options for an enhanced voluntary program.

As supported by the discussion in Section 2, the cost and effort for the print and distribution of informational materials and provision of online information are negligible. The combination of costs, requirements and potential benefits for interviews and workshops indicate that these are not reasonable options. At present, DWS conducts telephone interviews with food stamp applicants. However, the organization is in the middle of a movement away from this practice. A requirement for them to perform interviews as part of a voluntary program would present an opportunity cost of the inability to eliminate food stamp applicant interviews.<sup>12</sup> While workshops or classes do not present significant costs, attendance for these types of programs have been low in the past. The previously mentioned project and study regarding DWS workshop participation will inform whether this is a viable option.

<sup>11</sup> Available information only allow for a rough estimate here. However, it is likely that this option will cost under \$13,000 for initial printing and then less than \$5,000 in additional costs, considering that 12,260 families would be the maximum target audience in the first year, and then an estimated 33% of about 15,000 new applicants for following years. This calculation assumes about \$1 per each printed material.

<sup>12</sup> This opportunity cost is quantified by the average time for an interview, the number of full time employees (FTEs) that would be required for this time, and the average cost per FTE for DWS for expected new cases per year: 20min x 180,000 (15,000 x 12) = 60,000 hours  $\Rightarrow$  60,000/2080 = 28.85 FTE  $\Rightarrow$  28.85 x 65,000 = \$1,875,250

## Office of Recovery Services

This option could affect ORS operational expenditures through caseload increases. The number of extra cases that ORS would incur under a voluntary cooperation program cannot be predicted because of aforementioned data limitations. This results in an inability to accurately estimate a single cost figure. However, a range of cost estimates can be reported and is \$0 to \$1,145,100. As per ORS cost estimates, if all of the 12,260 custodial parent food stamp recipient households that have not, but could open a child support case did, annual costs for personnel would total \$1,145,100 for 18 additional employees.<sup>13</sup> This represents the maximum cost to ORS under a voluntary program. A voluntary option presents the possibility that ORS will acquire no additional cases, and this of course implies that there might be no extra expenditures.

One-time costs for technological enhancements would not be needed since tracking cases for compliance would not be necessary. This eliminates the need for the \$980,000 to \$1,400,000 that would be spent on a mandatory system. Food stamp recipients that opened an ORS case would be subject to current fees, so revenue would not decrease as it would in a mandatory program; this would result in about \$915,000 in additional state revenue as explored later in this document and explained in Appendix B. Like a mandatory option, ORS will not incur significant costs from employee training under this option.

## Utah Families

Outcomes for a voluntary option are either: 1) increased child support payments to families that could offset food stamp benefits, or 2) a continuation of current trends. Present trends are explored earlier in this report. This part of the discussion centers on the impacts of families under enhanced public outreach efforts to encourage cooperation with ORS while preserving the voluntary character of the current program.

While it is assumed that more families would open a child support case because of increased understanding, current data limitations do not allow for an estimation of how many families would do so. The majority of families that have an existing ORS case are likely those that have the highest probability of receiving child support as compared to those that have not. However, it is reasonable to assume that there are families that would receive child support if they opened an ORS case. A successful outreach program would induce these families to open a child support case. CY 2013 data implies that 51.37% of these food stamp recipient families could expect to receive at least one payment of \$200.00. Since data limitations constrict the predictions that can be made about the number of families that are included in this population, speculations as to the amount of aggregate child support that would be received from a voluntary program are not included here.

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<sup>13</sup> See Appendix B for more information.

Although there is no evidence that increased child support will boost custodial parents into self-sufficiency, CY 2013 matched data from ORS and DWS suggest that **families that collect child support payments through ORS receive \$72 less per year in food stamps than custodial parent families that are not paid formal child support.** This suggests that if a voluntary program increases child support payments, there could be a reduction in food stamp benefits issued. While this might be perceived as a benefit for society, it should be noted that this reduction presents an insignificant gain to aggregate families, ORS and DWS, the State budget, and Federal spending.<sup>14</sup>

## State of Utah & Federal Funds

Practical options for an enhanced voluntary program would present insignificant costs and savings to the State of Utah and Federal funds. As long as unfeasible options are not selected, DWS and ORS would incur slight costs from initiating a new voluntary program. Other fiscal impacts come from changes in DWS and ORS participation rates, and would be inconsequential in terms of the budgets for each department, the Utah general fund and to federal funds. DWS would be able to continue on its current pursuit of efficiency based practices in the food stamp program while reaching out to custodial parent households. This option would not impact ORS's competitiveness for federal awards because recovery rates would not significantly decrease as they could under a mandatory option. Furthermore, as with the option of continuing current food stamp eligibility practices, an enhanced voluntary program contains the opportunity for the state to receive additional revenue from increased fees related the ORS fee structure established in the 2014 Legislative Session.

### Option: Mandatory Program

Federal regulations for state options on child support requirements allow for disqualification of food stamp eligibility for: 1) custodial parents that do not cooperate with the State child support agency, 2) noncustodial parents that do not cooperate with the State child support agency, and 3) noncustodial parents that are delinquent on any court ordered child support agency.<sup>15</sup> As previously discussed, the noncustodial parent options are not viable for Utah and will not be explored.

## Department of Workforce Services & Office of Recovery Services

Costs incurred by DWS as a result of a food stamp cooperation requirement will not present a substantial increase to expenditures. The initial total cost estimate for additional personnel and one-time system enhancements was \$152,500.<sup>16</sup> A revised cost estimate resulted in an estimate of \$162,250;<sup>17</sup> this includes necessary new employees and computer system enhancements

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<sup>14</sup> The average reduction in food stamp benefits expected from child support payments would amount to about \$453,453.26 annually  $\Rightarrow 12,260 \times 0.5137 \times 72 = \$453,453.26$  per year; in contrast, 2013 food stamp benefits in Utah were close to \$378 million.

<sup>15</sup> See Section 1 for more on federal guidelines.

<sup>16</sup> See Appendix B for details.

<sup>17</sup> See Appendix B for details.

discussed previously. These estimated costs represent a small portion of DWS annual expenditures for assistance programs.<sup>18</sup> It should be noted that while DWS would also encounter costs to notify food stamp applicants and reapplicants as well as for employee training these would be inconsequential.

Unlike DWS, ORS would experience substantial cost increases that would range from \$3,040,628 to \$3,460,628, which represents about 7% of 2013 funding to the organization (Utah State Legislature, 2014). Updated cost estimates projected that there would be an additional 12,260 cases possible if a cooperation requirement was implemented. An increase of this many cases would require 18 additional employees, which would result in an annual cost of \$1,145,100. To put this into context, 2013 funding for ORS personnel was \$675,600 (Utah State Legislature, 2014). Technological enhancements would be necessary in order to track individuals for compliance. System implementation time would range from 14,000 to 20,000 hours, resulting in, \$980,000 to \$1,400,000 in costs.<sup>19</sup> Like DWS, training costs present an insignificant portion of expenditures for this option.

In addition to direct costs, a mandatory program would lead to a revenue reduction.<sup>20</sup> The ORS fee structure was altered during the 2014 Legislative Session. This change produced increased fees collected per case. Originally, ORS calculated a \$762,053 drop in revenue projections based on a fee reduction from \$24 to \$18. However, revised projections report \$915,528 of revenue lost due to the cooperation requirement; according to ORS, the reason for the reduction is that certain fees could no longer be charged to food stamp recipients by ORS since the cases would be classified as an assistance eligibility requirement (7CFR273.11 (o) (4) and (p) (4)). While fee collection would decrease, routine costs (e.g. mailing, services, etc.) would increase due to more cases. Again, the initial and updated cost estimates differ. The resulting difference is based on the combination of effects included in the updated estimate that were left out of the first.

The below table presents the total costs that a mandatory program would require for initial implementation. A range of low and high costs is reported because estimates for one-time costs for ORS system enhancements vary. Once the technological enhancements that make-up the one-time costs have been implemented, the associated expenditures will be considered sunk costs, and will have no bearing on future policy choices. Furthermore, while these costs will be incurred at one point in time, the systems they pay for will be used over many years, and this is not accounted for here. One-time costs are included without regard to time to demonstrate the resources needed to get a mandatory program off the ground, which is an essential consideration in the decision-making process.

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<sup>18</sup> Total DWS assistance programs expenditures was \$1,033,879,922 in 2013 (Office of Legislative Research and General Counsel, 2014).

<sup>19</sup> See Appendix B for details.

<sup>20</sup> See Appendix B for details.

TABLE 3: Total Costs, ORS & DWS					
	ORS		DWS	Combined	
	Low	High		Low	High
One-Time Costs	(\$980,000)	(\$1,400,000)	(\$55,000)	(\$1,035,000)	(\$1,455,000)
Operational Cost	(\$1,145,100)	(\$1,145,100)	(\$107,250)	(\$1,252,350)	(\$1,252,350)
Reduced Fees (ORS)	<u>(\$915,528)</u>	<u>(\$915,528)</u>	\$ -	<u>(\$915,528)</u>	<u>(\$915,528)</u>
<b>Total Costs</b>	<b>(\$3,040,628)</b>	<b>(\$3,460,628)</b>	<b>(\$162,250)</b>	<b>(\$3,202,878)</b>	<b>(\$3,622,878)</b>

See Appendix B for cost estimate details.

As shown by the table, ongoing operational costs will total \$1,252,279 in additional annual expenditures; these costs are more pertinent to ORS than DWS and represent 3% of 2013 funding to ORS (Utah State Legislature, 2014). The reduced fees for ORS denote revenue losses, as described previously, and reveal an opportunity cost of foregone ability to generate revenue under a mandatory option; federal regulations preclude the imposition of certain fees that would otherwise result in state revenue—these are not figures that would normally be included in financial reporting, but are important for decision-making.

Section 2 notes that ORS will experience lowered success rates under a mandatory program. This will impact ORS competitiveness for federal awards. Along with child support enforcement departments across the nation, ORS submits a year-end report to the federal government. Each year, nationally top-performing departments receive a federal award; ORS is typically in the top ten performing child support enforcement offices and has been granted funds based on this. The reduction in success rates mentioned in Section 2 could cause ORS to receive less or none of these annual federal awards. An estimated figure is not reported for this loss because the award amounts vary significantly from year-to-year and are not made known in advance.

## Utah Families

A mandatory program would have differing impacts on the 37,307 custodial parent families that receive food stamps in Utah. A portion of the 25,047 families that already have an ORS case, will likely receive a sanction for noncooperation. In CY 2013, 6.71% of TANF participants that had a child support case were sanctioned for noncooperation with ORS.<sup>21</sup> Investigation into the food stamp population, including interviews with key informants, provides evidence that this sanction rate is a good estimation for what could be expected for a food stamp eligibility requirement.<sup>22</sup> Additionally, it can reasonably be expected that the recovery rate for child support by those that would be impacted by a cooperation requirement would be similar to TANF; this rate is 29.5% as reported by ORS.

<sup>21</sup> It is recognized that TANF and Medicaid recipient populations both have some general similar demographic attributes as food stamp recipients. This allows for insight into the food stamp population by using TANF or Medicaid data. TANF data are chosen to base estimates on for this study for two important reasons: 1) Medicaid child support eligibility requirements are significantly different than TANF and food stamp options, and 2) Medicaid data presented higher limitations than TANF data.

<sup>22</sup> The reason that sanction rates for food stamp requirements would be similar to TANF is that these populations have many of the same characteristics. However, it should be noted that sanction rates for TANF might differ from food stamps because Utah applies a full family sanction for noncooperation for this program; under federal guidelines, states cannot elect a full family sanction for a food stamp child support eligibility requirement.

Another important factor is that a number of families that do not have a current case with ORS will choose to be sanctioned rather than cooperate with a child support requirement.<sup>23</sup> Data limitations do not allow for an estimation of how many families this would be. However, it is important to understand possible outcomes to families if a food stamp eligibility requirement rule change is enacted. To gain insight into effects on families, multiple scenarios have been explored below.

TABLE 4: Cooperation Requirement Effect: One-Parent and Stepparent Food Stamp Households					
Cooperation Scenario	Child Support Recipients			Food Stamp Sanctioned Households	
Percent of 12,260 Households Expected to Open an ORS Case	Percent of 37,037 Households that Would be Effected	10% Annual Child Support Receipt	60% Annual Child Support Receipt	Percent of 37,037 Households that Would be Effected	Aggregate Annual Food Stamp Benefit Reduction
0%	0%	\$ 0.00	\$ 0.00	37.37%	( \$ 14,812,933.65)
25%	2%	\$ 196,603.81	\$ 1,179,622.87	29.70%	(\$ 11,774,683.62)
50%	4%	\$ 393,207.62	\$ 2,359,245.74	22.04%	(\$ 9,173,493.46)
75%	7%	\$ 589,811.44	\$ 3,538,868.62	14.37%	(\$ 5,698,183.57)
100%	9%	\$ 786,415.25	\$ 4,718,491.49	6.71%	(\$ 2,659,933.54)

See Appendix C for details and supporting calculations.

The above calculations consider sanction rates for those that are expected to open a child support case, but are found to be non-cooperative, as well as sanctions for those that will apply for food stamps, but choose not to participate with ORS. Sanction rates are calculated utilizing CY 2013 DWS and ORS data for average monthly benefits and household sizes.<sup>24</sup> Generally, sanctioned families can expect to lose between \$74.46 and \$94.14 in monthly food stamp benefits, which accounts for about 6% to 9% of income for these households.<sup>25</sup> **Out of 37,307 families, between 6.71% and 37.37% are estimated to experience reductions in food stamp benefits due to a sanction.** Aggregate annual food stamp reductions are estimated to be between \$2.7 and \$14.8 million.

Child support receipt per family is based on the median for food stamp recipients reported by ORS data.<sup>26</sup> These calculations assume a 90.6% child support award along with a 29.5% recovery rate as clarified earlier. Families that will receive child support as a result of a newly opened ORS case can expect between \$240.00 and \$1,440 in annual child support income. New

<sup>23</sup> It should be noted that some custodial parent households might choose not to apply for food stamps because of a duty of support eligibility program. However, at this time there is no reasonable way of estimating how many people would fall into this category and this is not further explored.

<sup>24</sup> See Appendix C for details.

<sup>25</sup> The U.S. Census Bureau (2011) reports that the average annual total income for a single-parent food stamp recipient is between \$12,467.00 and \$15,608.21.

<sup>26</sup> It should be noted that the median child support payment to TANF families for 2013 was \$0; as explained earlier, medians are utilized in this report in cases where the mean does not present an accurate portrayal due to skewed data.



child support recipients will comprise 0% to 9% of the total population of 37,307 households. As mentioned, increased child support income could reduce food stamp benefits, but not to a significant degree (about \$72 per year for an average family).<sup>27</sup>

Studies show that the income needed to lift poor custodial parent households out of poverty and toward self-sufficiency is much higher than what can be expected from the receipt of additional child support payments (BYU Center for Economic Self-Reliance, 2008; Stirling & Aldrich, 2008). Evidence indicates that this is the case for food stamp recipient families in Utah under any of the options presented here. In each of these options, child support payments would offset monthly food stamp benefits by about \$6 per family for a fraction of custodial parent households.

**Under a mandatory program, while a few families could expect to receive some child support, a higher percentage would experience a reduction in food stamp benefits that would constitute a significant portion of their annual income.**

### State of Utah & Federal Funds

The amount saved from reductions in food stamp benefits that would result from a duty of support eligibility requirement for food stamps is insignificant to state and federal budgets. In 2013, about \$378.9 million was spent in food stamp benefit for Utahns (United States Department of Agriculture, Food and Nutrition Service, 2014). This accounted for 0.5% of the federal food stamp expenditures of \$76,066.3 million (United States Census Bureau, 2014; United States Department of Agriculture, Food and Nutrition Service, 2014). A child support requirement is estimated to save between \$2.7 and \$14.8 million in food stamp benefits annually. Food stamp benefits are funded by federal dollars. So, savings accrued for food stamp benefits will filter to federal, not state, funds. The portion of Utah spending of food stamp benefits would not be significantly reduced by a child support eligibility requirement.

Utah incurs expenditures from administrative costs for the food stamp program and for child support services. A food stamp eligibility requirement would add to administrative expenditures to ORS and DWS. These extra costs would be insignificant to DWS, but not for ORS. In 2013, \$367,400 of Utah's general fund was allocated to ORS for administrative costs; this represented about 36% of budgeted administrative costs for the organization. A mandatory program would require an additional \$1,145,100 in personnel costs, which would require \$412,236, (i.e. more than double 2013 funding) in additional general funds. Furthermore, voluntary program options, including current practices, allow the state to retain about 5% of child support collected for food stamp recipient households; if an eligibility requirement is instituted, 100% of child support received for food stamp households required would go to families, so the state will not recoup administrative expenses from any child support payments. It is clear that a mandatory program would increase state expenses for ORS administrative expenses and decrease funds that offset state costs.

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<sup>27</sup> Food stamp recipients that received income from child support in 2013 received \$6 less in monthly food stamp benefits on average than those with a child support case that did not collect child support income. The maximum aggregate amount expected in benefit reductions from this would be about \$236,000  $\Rightarrow$  number of families multiplied by child support award multiplied by expected recovery rate multiplied by the average reduction of monthly food stamp benefits per family  $\Rightarrow 12,260 \times 0.906 \times 0.295 \times (6 \times 12) = \$235,924.57$

## SECTION 4. Review of Demographic Data Informing Why Individuals Are Currently Not Seeking Child Support

### Highlights

- ✗ A common perception is that requirements associated with opening a child support case outweigh the benefits.
- ✗ Custodial low-income parents are not confident an open child support case would produce additional income for their family.

A number of qualitative studies have been undertaken to explore the factors that may contribute or explain why some eligible families do not try to obtain child support through opening a child support case. A variety of reasons cited in the literature resonate with findings that have been demonstrated in Utah. Interviews of many parents suggest that child support rules are perceived to pit mothers against fathers and create or exacerbate conflict in their relationships (Achatz and MacAllum, 1994; Sullivan, 1992; and Waller, 1996). These conflicts can make already difficult parenting arrangements more antagonistic and as a result, custodial parents decide they do not want to pursue formal child support. Case studies indicate that many unmarried low-income parents prefer to negotiate private agreements for support. Parents believe that participating in the formal child support system detracts from their children's well-being and may harm poor fathers. Additionally many such parents often face social and economic realities, such as low wages and unstable employment, or have inadequate information about how the child support system works. These conditions make it difficult for them to comply with existing policy, even if they wish to do so (Waller & Plotnick, 2001, p. 107).

### Utah Research

In 2011, SRI partnered with DWS to conduct a study (Vogel-Ferguson, 2014) of TANF participants (more commonly known as FEP for Family Employment Program in Utah). This longitudinal study examined customers beginning their experience with cash assistance and followed them for two years. Those in the study were randomly selected from a statewide pool and met four criteria. First, participants needed to have received between 2 and 9 months of cash assistance in Utah since Jan. 1997. Second, be in a category requiring child support participation. Third, have an open cash assistance case and fourth, reside in Utah. A total of 1075 participants were interviewed in 2012 and 862 of the cohort were interviewed in 2013.

Study participants were not asked directly about their experiences with ORS; however, it was not uncommon for participants to mention issues related to ORS. The data were scanned to find places where participants had referenced ORS. The summary below provides data from participants who spoke about some aspect of ORS or provided information about why they did not want to formally open a case with ORS or provide the information ORS was seeking. It is interesting to note, of those interviewed only one third of the children had child support paid on their behalf.



Respondents were asked to report why they believed they had never received child support. Because many respondents were new cash assistance recipients, it is not surprising to find 13% reported they were still in the process of filing with ORS. The most frequent reasons given included that the other parent was not working, refused to work, and thus had no support available. Others reported they were not able to locate the other parent, or the other parent was incarcerated. Some respondents indicated they were still married to or “with” the other parent and did not want to pursue child support. Additionally, some absent parents were reported to have moved out of the country and could not be pursued beyond the border. The table below summarizes the most frequent comments recorded during the interviews.

<b>TABLE 5: Most frequent reasons custodial parents cited for not receiving child support</b>		
	FY2012 (N=642)	FY2013 (N=464)
Noncustodial parent not working, refused to work, no support available	211	169
ORS unable to contact or locate second parent to collect	79	77
Incarcerated	77	54
Do not want contact / have not applied	66	48
Moved out of state/country	45	39

## Analysis

As previously stated, findings from published research nationally and interviews conducted locally demonstrate common themes regarding reasons why some choose not to formally open a child support case with ORS. The first general theme reflects a strong desire on the part of the custodial mother simply to not want the father involved formally through a relationship with ORS. Reasons justifying this position include the fact that the father has a relationship with the child or children and the mother places a high value on seeing that relationship continue. She views ORS involvement as an intrusion into the dynamics of the relationships between the family members, which may have a negative impact. In other words, if the custodial parent provides ORS with the noncustodial parents’ contact information their existing relationship will be compromised in some way that it unacceptable. Further, a number of mothers report the significance of receiving undocumented informal support and attribute this commitment as meaningful involvement that would likely disappear if a formal case were opened.

On the other end of the spectrum, the custodial parent does not want the noncustodial parent in her life or the life of her child. From the custodial parent perspective, the social costs of his involvement are too great, so she does not want ORS contacting or finding him. There are a number of reasons why she does not want ORS to contact the father of the child. These include personal dislike of the father and threats or potential threat of domestic violence or other abuse which would qualify for a “good cause” exemption.

A second theme observed in the interview comments relates to what is perceived as “futility” to try and force the involvement of the noncustodial parent. As seen in the summary table, respondents most frequently cited the father was not working or refused to work. Related is the notion inferring the sense of hopelessness is “he has evaded responsibility before and he will do it again, so it’s useless.”

The third cluster of comments can be categorized into *perceptions* of system barriers. Many of those interviewed indicated it is difficult to be involved with ORS since there are so many paperwork issues. Specifically, these can be divided into 1) the rules and regulations are complex and difficult to understand, and 2) the application process is lengthy or it is unclear how long the process will take. Repeatedly, respondents noted that filing applications for public assistance has been very difficult and so they assume it will be difficult to open a child support case with ORS. Further, if ORS finds the father, he will experience the same paperwork filing challenges which will result in consequences that come back to negatively impact the mother.

A fourth theme of perception-related comments about ORS indicates the agency staff is inconsistent in the treatment of both parties. For instance, for the custodial parent, there are seemingly high expectations for her to get a case opened, yet lack of trust when she does not or cannot provide his social security number, present location, and contact information. However, when a case is opened and ORS does make contact with the non-custodial parent it is unclear what standard of proof exists for the father. As a result the mother feels she is being treated unfairly.

Other barriers cited included problems communicating with the agency such as telephone problems and the perceived lack of responsiveness when calls are made. Language barriers like a lack of Spanish-speaking staff were also mentioned. Lastly, some shared the feeling of distrust they felt existed and several summarized this idea as “they just don’t believe me when I claim I don’t know *who he is or where he is*” (child from sexual assault, had multiple partners, or artificial insemination).

## SECTION 5. Review of Phase-In Options to Implement

### Highlights

- ✗ Federal guidelines exclude certain phase-in options such as a pilot test.
- ✗ Instant implementation of a mandatory option is not realistic.
- ✓ The range of practical options includes: no change to current voluntary program, enhancement of current voluntary program, or a phased transition from a voluntary to a mandatory program based on obtaining predetermined improvements.

The way the food stamp program is currently structured along with federal guidelines limit the viability of various phase-in options. For example, federal regulations do not allow for a pilot test because families would be treated differently which would be considered discriminatory. A short-run implementation study is out of the question because of high costs attributed to the initial outlay for computer system changes. Furthermore, if a mandatory option is selected, it cannot happen immediately because of the amount of time required to institute necessary technological changes. Before any decision to move forward is made, a benchmark for custodial parent food stamp participant cooperation with ORS should be established. 67.1% of these families have an existing ORS case; the amount of additional participation that would be considered a success for any program option needs to be established.

Given the many factors involved, the initiation of a mandatory program presents far too many challenges to allow for immediate implementation. Unlike a mandatory program, as long as practical options are selected, an enhanced voluntary program could be pursued relatively quickly because it would require considerably less modifications and costs. Also, there are aspects of a voluntary program that could be beneficial to a mandatory program. Full implementation could be delayed until further evidence of expected impacts is available. This would ensure that a mandatory program is needed and is initiated in the best possible way. A multi-year time series study could examine the effects of the voluntary system and would provide a more extensive analysis due to multiple year data availability. In addition, this option would allow for full implementation of a mandatory system at an optimal time. For instance, ORS is involved in a system overhaul and it could be advantageous to align the timing of changes needed for an eligibility requirement with this endeavor.

<b>TABLE 6: Recommended Phase-in Process</b>	
<b>Step 1</b>	
	Determine what success looks like. In 2013 most custodial parent food stamp recipient households had a child support case with ORS. It needs to be established how many more the state should try to compel to do so and what constitute reasonable efforts to do so.
<b>Step 2</b>	
	Institute an enhanced voluntary program that focuses on improved public outreach to encourage cooperation with ORS. This could begin with low-cost efforts such as distribution of print materials and links to online information.
<b>Step 3</b>	
	The new voluntary program should be evaluated for success and changes should be implemented as needed. This could happen through a multi-year time series analysis.
<b>Step 4</b>	
	Depending on the evaluation of the modified voluntary program, a decision about whether a mandatory program is needed could be made. Options at this time would be to maintain the program as is, to institute further enhancements, or to move to a mandatory program. If a mandatory program is opted for, timing for its implementation needs to be a primary consideration.

## SECTION 6. Inventory of Other States Currently Availing Themselves of This Option

### Highlights

- ✓ While 10 states have opted for a child support requirement for food stamps, only 3 continue to maintain this policy.

As discussed previously, food stamp statutes, regulations, and waivers provide state agencies with a variety of policy options. State agencies use this flexibility to adapt their programs to meet the needs of eligible, low-income families. Some of these options that many states (including Utah) have selected for implementation are listed in the table below.

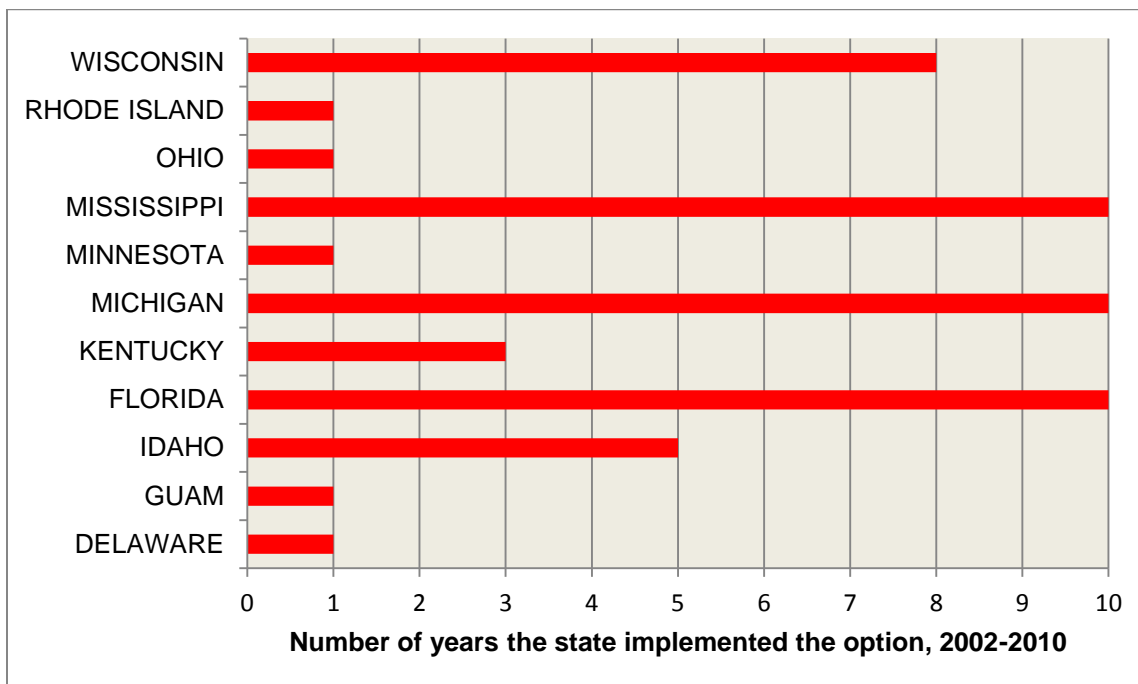
<b>TABLE 7: Common Food Stamp State Options Adopted by States</b>
Simplified reporting requirements for changes in financial status (27).
Vehicle policy that allows rules used in TANF programs for food stamp rules and has excluded the value of all vehicles in calculating household assets (37).
Using a Standard Utility Allowance (SUA) for all households in place of actual utility costs (48). Students enrolled in higher education at least half time are ineligible for food stamps unless they work at least 20 hours per week (27).
Online application and case management (35).

(USDA, State Options Report, 2012)

A number of steps were taken by SRI staff to determine the current status of states currently taking advantage of the food stamp child support cooperation requirement. First, SRI created an online survey that was emailed to state child support enforcement contacts in all 50 states. Second, staff analyzed the USDA's Food and Nutrition Service (FNS) state survey. Third, SRI staff consulted with food stamp and child support specialists with the National Conference of State Legislatures (NCSL) to obtain data about current policy options being selected nationwide. Fourth, SRI staff discussed state-specific policy decisions with two states that had implemented child support cooperation requirements for a few years, but then eliminated the option. The brief discussion that follows is based on a synthesis of these data collection steps.

While the online survey response was lacking with only 22 states responding, the analysis of the federal options survey, together with conversations with NCSL experts and food stamp representatives in two states has been informative. At the outset of the study, agency key informants indicated they were not aware of any states implementing the child support cooperation requirement for food stamps. The limited online survey response also supported this as none of the 22 states responding to the survey had adopted this policy. However, the survey findings from FNS surveys provided some important insights into state actions in applying various allowable options. The USDA has issued 10 State Options Reports issued since 2002.

During this time 10 different states have implemented the option to disqualify food stamp recipients who fail to cooperate with child support enforcement agencies. Of these 10 states, **only Florida, Michigan, and Mississippi maintained these policies each year and continue to do so.** Minnesota, Ohio, and Rhode Island only implemented the policy for one year and then it was discontinued. Additionally, two states, Idaho (5 years) and Wisconsin (8 years) have shifted their position on this policy by implementing the option, maintaining it for a number of years, and then discontinuing it. The figure below illustrates which states implemented the child support cooperation option and number of years that option was in place (USDA, 2012).

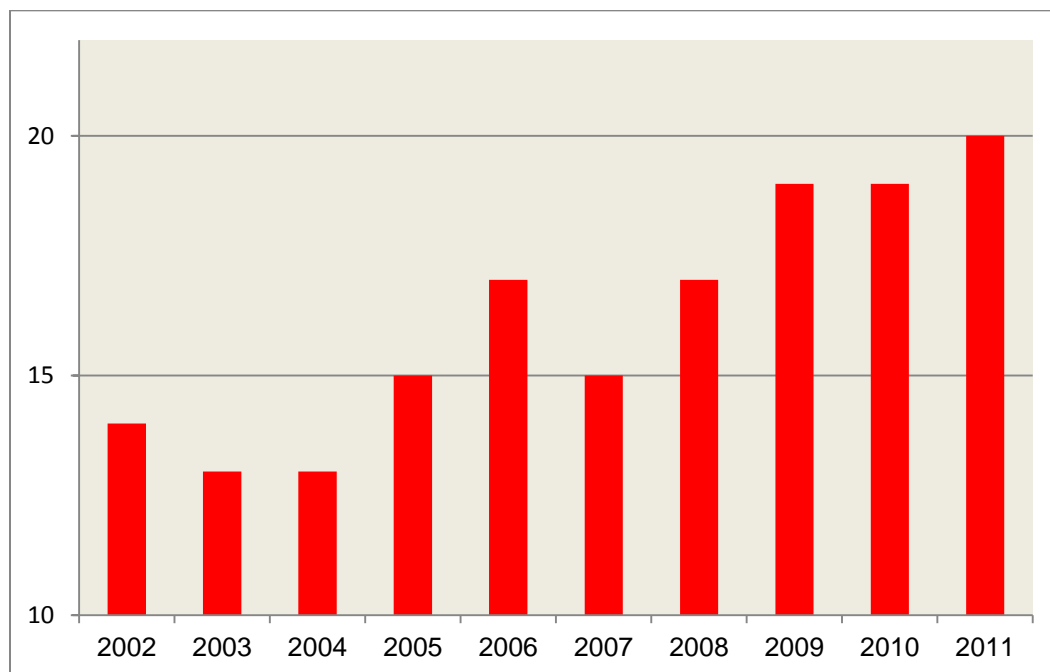


Given the similar experience Idaho and Wisconsin had in changing their option choice, SRI staff thought it was advisable to determine the factors that influenced the vacillation back and forth on this option. In telephone conversations with food stamp representatives in both states, it was clear that a number of factors influenced the decision to adopt the option and then to eliminate it. The first factor was the strong policy direction that existed which sought to expand food stamp participation for a number of years. Both states reported engaging in extensive outreach efforts to enroll as many eligible families as possible. As a result, the Idaho Welfare and Wisconsin FoodShare programs modified a number of policies (including placing cooperation requirements on noncustodial parents) to support this effort. Unfortunately, neither state contact could reference a study or specific data findings that were used to support these policy changes. However, in Wisconsin it was observed that **enrollment rates in food stamps by single parent households began to decrease.** Other anecdotal evidence suggested, eligible custodial parents were choosing not to apply for food stamps when the child support cooperation requirement was in place, signifying that it was more valuable to the family to receive informal support and / or have the father involved with the children than it was to receive the relatively limited food stamp benefits they may be entitled to.

The second factor cited by state representatives that influenced the changes in adopting this option and then reversing it was the perspective and desire of those in office in the respective states.

### The Option of Comparable Disqualification

Another option available to states is “comparable disqualification” and can only be imposed on the non-cooperative individual. Under this scenario, an individual who is not cooperating with the TANF program and is eligible to receive food stamps can be disqualified for not providing required information. This is true even if the TANF agency sanctions the entire family. The income and resources of the disqualified individual must be prorated in determining the eligibility and benefits for the rest of the household members. As with the ban on increasing benefits for a sanctioned household, the individual disqualified from food stamps can last only as long as the TANF finding of non-cooperation remains. Once cooperation takes place with the child support system and the TANF sanction is lifted, the sanctioned individual is once again eligible to receive food stamp benefits.



Historically, the number of states choosing to implement this option has increased significantly, as evidenced in the previous graph. Initially the first State Options report in 2002 listed 14 states that chose this option. They were California, Florida, Idaho, Kansas, Massachusetts, Maine, Michigan, Mississippi, Montana, North Dakota, Ohio, South Dakota, Tennessee, and Washington. Ten years later, in the most recent 2012 State Options Report 20 states were choosing this option including: Alaska, Florida, Georgia, Guam, Hawaii, Idaho, Kansas, Kentucky, Maine, Mississippi, Nebraska, New Jersey, New Mexico, New York, Ohio, Oregon,

South Carolina, Tennessee, Washington, and Wyoming. Despite the growth in the number of states choosing to implement this option, only 8 of the original 14 states continued to do so, suggesting that many states revise and shift their option choices over time.



## SECTION 7. Results Following Implementation of a Similar Policy with Temporary Assistance for Needy Families and Medicaid

### Highlights

- ✓ Requiring an open child support case for food stamp eligibility would create greater consistency with TANF and Medicaid.

If a low- income family receives some form of federally- funded assistance, it is likely to be subject to a child support cooperation requirement. As a result the individual who is required to cooperate will be dealing with both the agency responsible for the assistance and the child support enforcement agency. For most individuals subject to a cooperation requirement, that is not a problem. These individuals welcome the chance to pursue child support and obtain the additional income that may be possible.

If the household participates in more than one public benefit program, there is some potential for overlap and inconsistency. However, for the most part the federal regulations minimize potential problems, especially if the combination of programs in which the household participates includes TANF. As previously mentioned, if the household participates in TANF and Medicaid, the cooperation requirements are quite similar. Further, if ORS has already determined that the individual is entitled to a good cause exemption to the cooperation requirement, the Medicaid agency must adopt this finding.

If the household participates in TANF and is eligible for food stamps in a state which has opted to impose a child support cooperation requirement on custodial parents receiving food stamps, the cooperation requirements are also likely to be similar. Once again the good cause stipulation applies here to both programs.

This situation with having interrelated programs does have one overarching flaw, however. Since TANF is the lynchpin program, if a state defines cooperation in a way that makes it difficult to meet the obligation, there will be serious consequences for the household beyond the TANF program.

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# APPENDICES

# APPENDIX A

## State option on child support requirement regulations

Accessed August, 5, 2014 from:

[http://www.ecfr.gov/cgi-](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=825bc00ab9445bd3bd9e47fa8af4e35a&ty=HTML&h=L&n=7y4.1.1.3.21&r=PART#7:4.1.1.3.21.4.1.4)

[bin/retrieveECFR?gp=1&SID=825bc00ab9445bd3bd9e47fa8af4e35a&ty=HTML&h=L&n=7y4.1.1.3.21&r=](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=825bc00ab9445bd3bd9e47fa8af4e35a&ty=HTML&h=L&n=7y4.1.1.3.21&r=PART#7:4.1.1.3.21.4.1.4)  
PART#7:4.1.1.3.21.4.1.4

(o) *Custodial parent's cooperation with the State Child Support Agency.* For purposes of this provision, a custodial parent is a natural or adoptive parent who lives with his or her child, or other individual who is living with and exercises parental control over a child under the age of 18.

(1) *Option to disqualify custodial parent for failure to cooperate.* At the option of a State agency, subject to paragraphs (o)(2) and (o)(4) of this section, no natural or adoptive parent or, at State agency option, other individual (collectively referred to in this paragraph (o) as "the individual") who is living with and exercising parental control over a child under the age of 18 who has an absent parent shall be eligible to participate in SNAP unless the individual cooperates with the agency administering a State Child Support Enforcement Program established under Part D of Title IV of the Social Security Act (42 U.S.C. 651, *et seq.*), hereafter referred to as the State Child Support Agency.

(i) If the State agency chooses to implement paragraph (o)(1) of this section, it must notify all individuals of this requirement in writing at the time of application and reapplication for continued benefits.

(ii) If the State agency chooses to implement paragraph (o)(1) of this section, it must refer all appropriate individuals to the State Child Support Agency.

(iii) If the individual is receiving TANF or Medicaid, or assistance from the State Child Support Agency, and has already been determined to be cooperating, or has been determined to have good cause for not cooperating, then the State agency shall consider the individual to be cooperating for SNAP purposes.

(iv) The individual must cooperate with the State Child Support Agency in establishing paternity of the child, and in establishing, modifying, or enforcing a support order with respect to the child and the individual in accordance with section 454(29) of the Social Security Act (42 U.S.C. 654(29)).

(v) Pursuant to Section 454(29)(E) of the Social Security Act (42 U.S.C. 654(29)(E)) the State Child Support Agency will notify the individual and the State agency whether or not it has determined that the individual is cooperating in good faith.

(2) *Claiming good cause for non-cooperation.* Prior to requiring cooperation under paragraph (o)(1) of this section, the State agency will notify the household in writing at initial application and at application for continued benefits of the right to good cause as an exception to the cooperation requirement and of all the requirements applicable to a good cause determination. Paragraph (o)(1) of this section shall not apply to the individual if good cause is found for refusing to cooperate, as determined by the State agency:

(i) *Circumstances under which cooperation may be "against the best interests of the child."* The individual's failure to cooperate is deemed to be for "good cause" if:

(A) The individual meets the good cause criteria established under the State program funded under Part A of Title IV or Part D of Title IV of the Social Security Act (42 U.S.C. 601, *et seq.*, or 42 U.S.C. 651,

*et seq.*) (whichever agency is authorized to define and determine good cause) for failing to cooperate with the State Child Support Agency; or

(B) Cooperating with the State Child Support Agency would make it more difficult for the individual to escape domestic violence or unfairly penalize the individual who is or has been victimized by such violence, or the individual who is at risk of further domestic violence. For purposes of this provision, the term “domestic violence” means the individual or child would be subject to physical acts that result in, or are threatened to result in, physical injury to the individual; sexual abuse; sexual activity involving a dependent child; being forced as the caretaker relative of a dependent child to engage in nonconsensual sexual acts or activities; threats of, or attempts at physical or sexual abuse; mental abuse; or neglect or deprivation of medical care.

(C) The individual meets any other good cause criteria identified by the State agency. These criteria will be defined in consultation with the Child Support Agency or TANF program, whichever is appropriate, and identified in the State plan according to §272.2(d) (xiii).

(ii) *Proof of good cause claim.* (A) The State agency will accept as corroborative evidence the same evidence required by Part A of Title IV or Part D of Title IV of the Social Security Act (42 U.S.C. 601, *et seq.* or 42 U.S.C. 651, *et seq.*) to corroborate a claim of good cause.

(B) The State agency will make a good cause determination based on the corroborative evidence supplied by the individual only after it has examined the evidence and found that it actually verifies the good cause claim.

(iii) *Review by the State Child Support or TANF Agency.* Prior to making a final determination of good cause for refusing to cooperate, the State agency will afford the State Child Support Agency or the agency which administers the program funded under Part A of the Social Security Act the opportunity to review and comment on the findings and the basis for the proposed determination and consider any recommendation from the State Child Support or TANF Agency.

(iv) *Delayed finding of good cause.* The State agency will not deny, delay, or discontinue assistance pending a determination of good cause for refusal to cooperate if the applicant or recipient has complied with the requirements to furnish corroborative evidence and information. In such cases, the State agency must abide by the normal processing standards according to §273.2(g).

(3) *Individual disqualification.* If the State agency has elected to implement this provision and determines that the individual has not cooperated without good cause, then that individual shall be ineligible to participate in SNAP. The disqualification shall not apply to the entire household. The income and resources of the disqualified individual shall be handled in accordance with paragraph (c)(2) of this section.

(4) *Fees.* A State electing to implement this provision shall not require the payment of a fee or other cost for services provided under Part D of Title IV of the Social Security Act (42 U.S.C. 651, *et seq.*)

(5) *Terminating the disqualification.* The period of disqualification ends once it has been determined that the individual is cooperating with the State Child Support Agency. The State agency must have procedures in place for re-qualifying such an individual.

(p) *Non-custodial parent's cooperation with child support agencies.* For purposes of this provision, a “non-custodial parent” is a putative or identified parent who does not live with his or her child who is under the age of 18.



(1) *Option to disqualify non-custodial parent for refusal to cooperate.* At the option of a State agency, subject to paragraphs (p)(2) and (p)(4) of this section, a putative or identified non-custodial parent of a child under the age of 18 (referred to in this subsection as “the individual”) shall not be eligible to participate in SNAP if the individual refuses to cooperate with the State agency administering the program established under Part D of Title IV of the Social Security Act (42 U.S.C. 651, *et seq.*), hereafter referred to as the State Child Support Agency, in establishing the paternity of the child (if the child is born out of wedlock); and in providing support for the child.

(i) If the State agency chooses to implement paragraph (p)(1) of this section, it must notify all individuals in writing of this requirement at the time of application and reapplication for continued benefits.

(ii) If the individual is receiving TANF, Medicaid, or assistance from the State Child Support Agency, and has already been determined to be cooperating, or has been determined to have good cause for not cooperating, then the State agency shall consider the individual is cooperating for SNAP purposes.

(iii) If the State agency chooses to implement paragraph (p)(1) of this section, it must refer all appropriate individuals to the State Child Support Agency established under Part D of Title IV of the Social Security Act (42 U.S.C. 651, *et seq.*).

(iv) The individual must cooperate with the State Child Support Agency in establishing the paternity of the child (if the child is born out of wedlock), and in providing support for the child.

(v) Pursuant to Section 454(29)(E) of the Social Security Act (42 U.S.C. 654(29)(E)), the State Child Support Agency will notify the individual and the State agency whether or not it has determined that the individual is cooperating in good faith.

(2) *Determining refusal to cooperate.* If the State Child Support Agency determines that the individual is not cooperating in good faith, then the State agency will determine whether the non-cooperation constitutes a refusal to cooperate. Refusal to cooperate is when an individual has demonstrated an unwillingness to cooperate as opposed to an inability to cooperate.

(3) *Individual disqualification.* If the State agency determines that the non-custodial parent has refused to cooperate, then that individual shall be ineligible to participate in SNAP. The disqualification shall not apply to the entire household. The income and resources of the disqualified individual shall be handled according to paragraph (c)(2) of this section.

(4) *Fees.* A State electing to implement this provision shall not require the payment of a fee or other cost for services provided under Part D of Title IV of the Social Security Act (42 U.S.C. 651, *et seq.*)

(5) *Privacy.* The State agency shall provide safeguards to restrict the use of information collected by a State agency administering the program established under Part D of Title IV of the Social Security Act (42 U.S.C. 651, *et seq.*) to purposes for which the information is collected.

(6) *Termination of disqualification.* The period of disqualification ends once it has been determined that the individual is cooperating with the child support agency. The State agency must have procedures in place for re-qualifying such an individual.

(q) *Disqualification for child support arrears—*(1) *Option to disqualify.* At the option of a State agency, no individual shall be eligible to participate in SNAP as a member of any household during any month that the individual is delinquent in any payment due under a court order for the support of a child of the individual. The State agency may opt to apply this provision to only non-custodial parents.

(2) *Exceptions.* A disqualification under paragraph (q)(1) of this section shall not apply if:

(i) A court is allowing the individual to delay payment;

(ii) The individual is complying with a payment plan approved by a court or the State agency designated under Part D of Title IV of the Social Security Act (42 U.S.C., 651 *et seq.*) to provide support of a child of the individual; or

(iii) The State agency determines the individual has good cause for non-support.

(3) *Individual disqualification.* If the State agency has elected to implement this provision and determines that the individual should be disqualified for child support arrears, then that individual shall be ineligible to participate in SNAP. The disqualification shall not apply to the entire household. The income and resources of the disqualified individual shall be handled according to paragraph (c)(2) of this section.

(4) *Collecting claims.* State agencies shall initiate collection action as provided for in §273.18 for any month a household member is disqualified for child support arrears by sending the household a written demand letter which informs the household of the amount owed, the reason for the claim and how the household may pay the claim. The household should also be informed as to the adjusted amount of income, resources, and deductible expenses of the remaining members of the household for the month(s) a member is disqualified for child support arrears.

[Amdt. 132, 43 FR 47889, Oct. 17, 1978]

EDITORIAL NOTE: For FEDERAL REGISTER citations affecting §273.11, see the List of CFR Sections Affected, which appears in the Finding Aids section of the printed volume and at [www.fdsys.gov](http://www.fdsys.gov).

# APPENDIX B

## DWS & ORS Cost Estimates

### DWS Cost Estimates

These costs only account for requiring custodial parents to complete a duty of support (DOS).

FS = Food stamps

Making the assumptions: 1) The below impacts & costs are **eRep ONLY (eRep the DWS data system)**

- 2) FS evidence will follow Financial DOS
- 3) FS DOS will use existing absent parent evidence
- 4) Good cause will use existing criteria & ORS identical ORS process; (ORS = Office of Recovery Services)
- 5) DOS non-cooperation will only sanction the parent;
- 6) Benefit calc will reduce HH size (versus something unique to FS);
- 7) \$\$\$ reduction the same regardless of HH removal;
- 8) FS will use same NOD, DOS, Non coop, etc notices as financial;
- 9) Modify eRep-ORS interface(s);
- 10) New COGNOS reports will be required.

**One-time costs: note, these costs are the same for initial and revised estimates.**

eREP Hours

BA \$60 x 180    \$10,800

IA \$71 x 200    14,200

Dev \$100x 300    30,000

**\$55,000**

This estimate DOES NOT include:

- a) ORS efforts & costs
- b) ESD operational efforts & costs
- c) WDD stuff
- e) Prioritization and delivery schedule

### *Initial Estimates*

Operational costs will be as follows:

33,630 FS hh need to cooperate with FS DOS requirements

$33,630 \times 98.67\% \times 5 \text{ minutes} = 33,183 \times 5 \text{ minutes} = 2765 \text{ hours per year} / 2080 \text{ hours} = 1.30 \text{ FTE's per year}$

$33,630 \times 1.33\% = 447 \times 45 \text{ minutes} = 335 \text{ hours per year} / 2080 \text{ hours} = .16 \text{ FTE per year}$

$1.30 + .16 = 1.50 \text{ FTE's per year} \times \$65,000 = \$97,500 \text{ per year.}$

### *Revised Estimates*

Operational costs:

37,307 FS hh need to cooperate with FS DOS requirements

$37,307 \times 98.67\% \times 5 \text{ minutes} = 36,810.82 \times 5 \text{ minutes} = 3,067.57 \text{ hours per year} / 2080 \text{ hours} = 1.47 \text{ FTE's per year}$

$37,307 \times 1.33\% = 469.18 \times 45 \text{ minutes} = 372.14 \text{ hours per year} / 2080 \text{ hours} = 0.18 \text{ FTE's per year}$

$1.47 + 0.18 = 1.65 \text{ FTE's per year} \times \$65,000 = \textbf{\$107,250 per year}$

## ORS Cost Estimates

### *Initial Estimates*

#### Office of Recovery Services

#### Cost Estimates for Rule Change to Require Child Support Case as part of Food Stamp Eligibility

January 10, 2014

#### Background

Senator Henderson, through the Legislative Fiscal Analyst, has requested information about estimated costs to the Office of Recovery Services (ORS) if the Department of Workforce Services (DWS) were to require an open child support case as a condition of eligibility for food stamps. It is estimated that 25,300 additional cases would be referred to ORS as a result of this change (as a comparison, ORS had 88,649 cases open on September 30, 2013 for federal reporting purposes).

#### Overview of Estimated Additional Costs

For ORS, most of the additional costs fall into two categories: first, staff requirements to manage the large number of additional cases; and second, technological costs associated with reprogramming the ORSIS computer system with full functionality (e.g. referrals and other information exchanges with eREP, non-cooperation processes, fees and other accounting issues, etc.) for food stamp cases.

<b>Estimated Annual Cost of Additional Permanent Personnel Needed:</b>	<b>\$ 2,429,500</b>
<b>Estimated Cost of Necessary ORSIS Enhancements:</b>	<b>\$ 980,000 to \$ 1,400,000</b>
<b>Estimated Time Needed for ORSIS Enhancements<sup>1</sup>:</b>	<b>14,000 – 20,000 hours</b>

**Other:** Fees could not be charged on these cases because the cases would be tied to an assistance eligibility requirement (7 CFR 273.11 (o) (4) and (p) (4); however, routine case costs would increase due to the increased number of cases (mailing, process service, etc.).

This would reduce the projected fees revenue provided to the Legislative Fiscal Analyst for the proposal to change the ORS fee structure to a percentage based fee rather than a flat fee. Without additional funding, the maximum fee that could be collected per case/per month drops to \$18.00 from \$24.00, causing a decrease in fee revenue projections of \$762,053.

#### Supporting Calculations

Number of Additional Cases:

34,000	Per DWS, number of existing food stamp cases with only one parent in home
<u>Less: 8,676</u>	Per DWS, 2/3 of the 13,014 existing food stamp cases receiving child support already have cases with ORS
<b>25,324</b>	Additional ORS cases expected to result from rule change

Additional Collection Caseloads

<b>29</b>	Additional collection caseloads due to rule change (Total new cases / Average caseload size: 25,324 / 860)
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Additional Personnel Needed

	Agents	Senior Agents	Supervisors	Notes
Collection	28	7	3	Average agent caseload is 860 cases. One senior agent is needed for every 4 agents. One supervisor is needed for every 10-12 employees.

#### Personnel Costs<sup>2</sup>

Agents	28	@	\$62,200 =	\$1,741,600
Senior Agents	7	@	\$67,500 =	472,500
Supervisors	3	@	\$71,800 =	215,400
<b>Total:</b>	<b>38 employees</b>			<b>\$2,429,500</b>

#### Enhancement Costs

Hours (low)	14,000	@	\$70.00	=	<b>\$ 980,000</b>
Hours (high)	20,000	@	\$70.00	=	<b>\$1,400,000</b>

#### Notes

1. The calendar timeframe for implementation will depend on competing enhancements using the limited programming resources available to ORS. These same programming resources are already committed to numerous other enhancements, including the ORSIS changes required due to the MMIS upgrade, and federally-mandated changes due to new child support security requirements, federally-mandated changes related to DWS interfaces, and replacing an aging document generation system, just to name a few.
2. Personnel costs are based on lowest working-level wages for each position, and average of current employee benefits. Breakdown as follows:

Position	Salary	Insurance	Benefits	Phone	Technology	Total (rounded to nearest hundred)
Agent	\$36,352.08	\$11,151.59	\$12,014.36	\$390.00	\$2,284.52	\$62,200
Senior Agent	\$40,548.96	\$10,869.12	\$13,401.43	\$390.00	\$2,284.52	\$67,500
Supervisor	\$42,804.00	\$12,224.49	\$14,146.72	\$390.00	\$2,284.52	\$71,800

## *Revised Estimates*

### **Office of Recovery Services**

#### **Cost Estimates for Rule Change to Require Child Support Case as part of Food Stamp Eligibility**

**August 9, 2014 (Updated for Food Stamp Study)**

### **Background**

During the 2014 Legislative Session, Senator Henderson, through the Legislative Fiscal Analyst, requested information about estimated costs to the Office of Recovery Services (ORS) if the Department of Workforce Services (DWS) were to require an open child support case as a condition of eligibility for Food Stamps. At the time, it was estimated that 25,300 additional cases would be referred to ORS as a result of this change (as a comparison, ORS had 88,649 cases open on September 30, 2013 for federal reporting purposes).

The Legislature requested an independent study of the costs and benefits to this rule change to be conducted during the 2015 interim. As a result, the data has been reexamined, removing cases where Food Stamp recipients were already required to cooperate with ORS due to other program benefits being received. Based on Calendar Year 2013 figures, it is now estimated that approximately 12,260 additional cases would be referred to ORS over the course of a year as a result of this change.

### **Overview of Estimated Additional Costs**

For ORS, most of the additional costs fall into two categories: first, staff requirements to manage the large number of additional cases; and second, technological costs associated with reprogramming the ORSIS computer system with full functionality (e.g. referrals and other information exchanges with eREP, non-cooperation processes, fees and other accounting issues, etc.) for Food Stamp cases.

<b>Estimated Annual Cost of Additional Permanent Personnel Needed:</b>	<b>\$ 1,145,100</b>
<b>Estimated Cost of Necessary ORSIS Enhancements<sup>1</sup>:</b>	<b>\$ 980,000 to \$ 1,400,000</b>
<b>Estimated Time Needed for ORSIS Enhancements<sup>2</sup>:</b>	<b>14,000 – 20,000 hours</b>

**Other:** This would reduce the projected fees revenue provided to the Legislative Fiscal Analyst related to the change to the ORS

fee structure in the 2014 Legislative Session. If this rule changes without additional funding, the maximum fee that

could be collected per case/per month drops to \$21.00 from \$24.00.

Fees could no longer be charged on ORS cases where the participants are Food Stamp recipients because the cases would be tied to an assistance eligibility requirement (7 CFR 273.11 (o) (4) and (p) (4); however, routine case costs would increase due to the increased number of cases (mailing, process service, etc.).

The following is a comparison of total combined effect of this rule change on the fee projections for the fee change passed in 2014 General Session. Comparisons based on 2013 actual collections and fees.

#### **Original Projections:**

<b>Total Fees Projected, 6% fee with \$24.00 maximum):</b>	<b>\$4,574,526</b>	<b>(Increase of</b>
<b>\$2,029,651 over 2013)</b>		

#### **Revised Projections if Food Stamp Rule Change Passes:**

<b>Total Fees Projected, 6% fee with \$21.00 maximum, and</b>		
<b>No fees on Food Stamp Eligible Cases:</b>	<b>\$3,662,998</b>	<b>(Increase of</b>
<b>\$1,118,124 over 2013)</b>		

**Projected Annual Loss of Fee Revenue based on this rule change: (\$ 915,528)**



## Supporting Calculations

Number of Additional Cases:

37,307	Per DWS, number of existing Food Stamp cases with only one parent or stepparent in home in CY 2013
<u>Less: 25,047</u>	Per DWS/ORS case match, number of existing ORS cases for Food Stamp recipients in CY 2013
<b>12,260</b>	Additional ORS cases expected to result from rule change over one year

Additional Collection Caseloads<sup>3</sup>

<b>14.26</b>	Additional collection caseloads due to rule change (Total new cases / Average caseload size: 12,260 / 860)
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Additional Personnel Needed

	Agents	Senior Agents	Supervisors	Notes
Collection	14	3	1	Average agent caseload is 860 cases. One senior agent is needed for every 4 agents. One supervisor is needed for every 10-12 employees.

Personnel Costs<sup>4</sup>

Agents	14	@	\$62,200 =	\$ 870,800
Senior Agents	3	@	\$67,500 =	202,500
Supervisors	1	@	\$71,800 =	71,800
<b>Total:</b>	<b>18 employees</b>			<b>\$1,145,100</b>

Enhancement Costs

Hours (low)	14,000	@	\$70.00	=	<b>\$ 980,000</b>
Hours (high)	20,000	@	\$70.00	=	<b>\$1,400,000</b>

## Notes

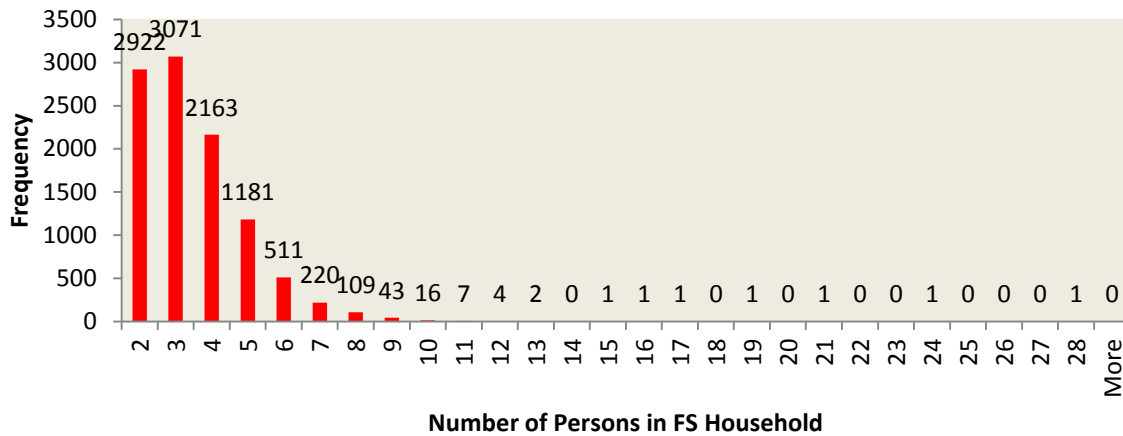
- This is an estimate of existing funding that would have to be redirected to complete this project. Unfortunately, providing additional funding will not make additional people available with the right programming skills or ORSIS system knowledge to complete this enhancement.
- The calendar timeframe for implementation will depend on competing enhancements using the limited programming resources available to ORS. These same programming resources are already committed to numerous other enhancements, including the ORSIS changes required due to the MMIS upgrade, and federally-mandated changes due to new child support security requirements, federally-mandated changes related to DWS interfaces, federally-mandated implementation of Electronic Income Withholding, and replacing an aging and no longer supported document generation system, just to name a few.
- Caseload and personnel estimates are based on post-order collection caseloads, which have the highest average of cases per agent. If other types of casework are required, the ratio of cases per worker drops, requiring additional staff. For example, order establishment caseloads average 240 cases per agent.
- Personnel costs are based on lowest working-level wages for each position, and average of current employee benefits. Breakdown as follows:

Position	Salary	Insurance	Benefits	Phone	Technology	Total (rounded to nearest hundred)
Agent	\$36,352.08	\$11,151.59	\$12,014.36	\$390.00	\$2,284.52	\$62,200
Senior Agent	\$40,548.96	\$10,869.12	\$13,401.43	\$390.00	\$2,284.52	\$67,500
Supervisor	\$42,804.00	\$12,224.49	\$14,146.72	\$390.00	\$2,284.52	\$71,800

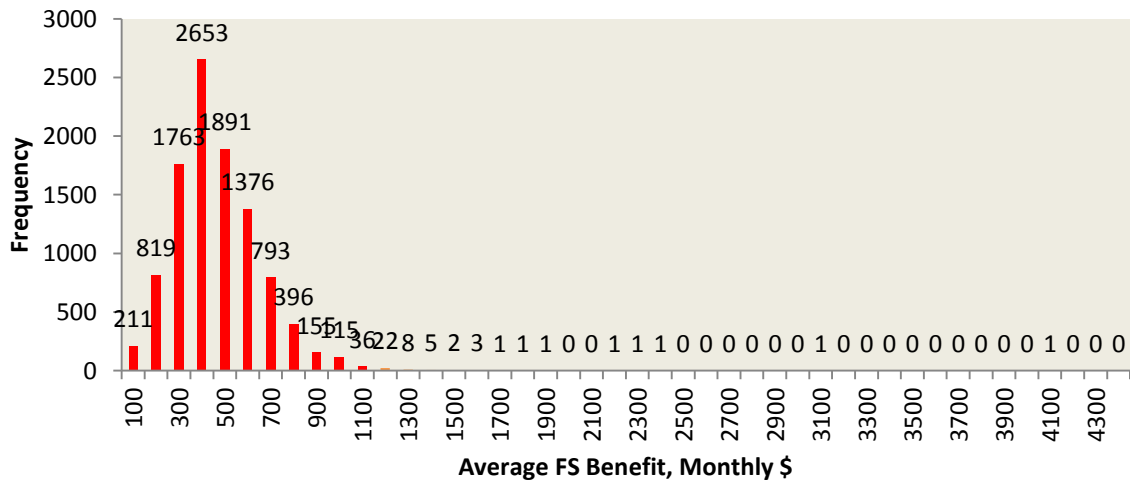
# APPENDIX C

Supporting Calculations and Notes:

### Average Household Size, Food Stamp Participants with Existing ORS Case CY 2013



### Average Benefit Amount, Food Stamp Participants with Existing ORS Case CY 2013



Utah & U.S. Food Stamp Spending, FY2013		
	Average Benefit Utah Households FY2013	Average Benefit U.S. Households FY2013
Monthly Food Stamp Spending	\$ 31,492,136.44	\$ 6,338,947,852.08
Annual Food Stamp Spending	\$ 377,905,637.28	\$ 76,067,374,224.96

Utah v U.S. Demographics***			
	Utah	U.S.	Utah/U.S.
Population, 2013 estimate	2,900,872	316,128,839	0.9176%
Persons Below Poverty Level	12.10%	14.90%	0.1110%
Total Households	880,873.00	115,226,802.00	0.7645%
Households Receiving FS	11.47%	20.01%	0.0877%

Mean Total Money Income of Food Stamp Recipient Custodial Parents in 2011, Source: U.S. Census Bureau, Current Population Survey, April 2012			
Received Awarded Child Support		Did Not Receive Awarded Child Support	Was Not Awarded Child Support
Total Income	Child Support Income	Total Income	Total Income
\$ 14,042.00	\$ 4,663.00	\$ 15,071.00	\$ 12,467.00

Sanction Effect: Annual Child Support Receipt Per Family			
60%	\$200*7.2 months	\$	2,179.66
50%	\$200*6 months	\$	1,816.38
40%	\$200*4.8 months	\$	1,453.10
30%	\$200*3.6 months	\$	1,089.83
20%	\$200*2.4 months	\$	726.55
10%	\$200*1.2 months	\$	363.28

Utah Food Stamp Income Chart, Source: <a href="http://jobs.utah.gov/customereducation/services/foodstamps/qualify.html">http://jobs.utah.gov/customereducation/services/foodstamps/qualify.html</a>		Utah Food Stamp Income Estimates, Source: <a href="http://www.benefits.gov/benefits/benefit-details/1590">http://www.benefits.gov/benefits/benefit-details/1590</a>
Household Size	Gross Monthly Income Limits 130% of Poverty*	Gross Annual Income Limits
1	\$ 1,245.00	\$ 19,256.00
2	\$ 1,681.00	\$ 25,955.00
3	\$ 2,116.00	\$ 32,654.00
4	\$ 2,552.00	\$ 39,353.00
5	\$ 2,987.00	\$ 46,052.00
6	\$ 3,423.00	\$ 52,751.00
7	\$ 3,858.00	\$ 59,450.00
8**	\$ 4,294.00	\$ 66,149.00
9	\$ 4,730.00	\$ 72,848.00
10	\$ 5,166.00	\$ 79,547.00
11	\$ 5,602.00	\$ 86,246.00
12	\$ 6,038.00	\$ 92,945.00
13	\$ 6,474.00	\$ 99,644.00
14	\$ 6,910.00	\$ 106,343.00
15	\$ 7,346.00	\$ 113,042.00
16	\$ 7,782.00	\$ 119,741.00
17	\$ 8,218.00	\$ 126,440.00
18	\$ 10,980.00	\$ 133,139.00
19	\$ 11,533.00	\$ 139,838.00
20***	\$ 12,086.00	\$ 146,537.00
21	\$ 12,522.00	\$ 153,236.00
22	\$ 12,958.00	\$ 159,935.00
23	\$ 13,394.00	\$ 166,634.00
24	\$ 13,830.00	\$ 173,333.00
25	\$ 14,266.00	\$ 180,032.00
26	\$ 14,702.00	\$ 186,731.00
27	\$ 15,138.00	\$ 193,430.00
28	\$ 15,574.00	\$ 200,129.00
Add'l Person	\$ 436.00	\$ 6,699.00

**NOTES:**

Elderly and Disabled Have Different Limits

8 is the cutoff for the annual income limits; \$6,699 is added for each additional person.

20 is the cutoff for the monthly income limits; \$436 is added for each additional person.

Average Monthly Benefit Per Household Size		
<i>Average Household Size</i>	<i>Average Benefit Pre-Sanction</i>	<i>Monthly Average Benefit Post Sanction</i>
1	\$ 189.59	NA
2	\$ 286.76	\$ 189.59
3	\$ 380.90	\$ 286.76
4	\$ 457.36	\$ 380.90
5	\$ 537.40	\$ 457.36
6	\$ 621.36	\$ 537.40
7	\$ 699.92	\$ 621.36
8	\$ 768.48	\$ 699.92
9	\$ 842.84	\$ 768.48
10	\$ 932.81	\$ 842.84
11	\$ 1,044.71	\$ 932.81
12	\$ 1,222.25	\$ 1,044.71
13	\$ 791.00	\$ 1,222.25
14*	NA	\$ 791.00
15	\$ 1,674.00	\$ 1,232.50
16	\$ 2,379.00	\$ 1,674.00
17	\$ 1,872.00	\$ 2,379.00
18*	NA	\$ 1,872.00
19	\$ 2,106.00	\$ 1,954.70
20*	NA	\$ 2,106.00
21	\$ 2,257.00	\$ 2,188.70
22*	NA	\$ 2,257.00
23*	NA	\$ 2,339.70
24	\$ 3,041.00	\$ 2,422.40
25*	NA	\$ 3,041.00
26*	NA	\$ 3,123.70
27*	NA	\$ 3,206.40
28	\$ 4,068.00	\$ 3,289.10

Notes & Assumptions
1) All data is for CY 2013 single-/step-parent Food Stamp participating households.
2) Data sources: ORS data tables and statistics, DWS/ORS data
3) Expected sanction rate is based on the percentage of cash assistance cases that received a sanction CY2013
4) Frequency distributions for household sizes are based on CY2013 food stamp participant with an ORS case, as reported by DWS/ORS data sets.
5) Food stamp \$ loss calculates the impact of a cooperation requirement that would cause a 6.71% expected sanction rate for those that had an open ORS case CY2013 and for those that are expected to open an ORS case due to the requirement, along with the effect for those that would not open an ORS case.

Key		
	<u>Number</u>	<u>Percent</u>
Total Households	37,307	100.00%
Households with an open child support case	25,047	67.14%
Households without an open child support case	12,260	32.86%
Expected Sanction Rate		6.71%
Expected Households Compliant		93.29%



TABLE 1: Frequency Dist.of FS Households with ORS Case			TABLE 2: Estimated Frequency Dist. Total CY2013 Households (37,307)	TABLE 3: Estimated Frequency Dist. CY2013 Households WITH Child Support Case (25,047)
<i>Avg Household Size</i>	<i>Frequency</i>	<i>%</i>	<i>%</i>	<i>%</i>
1	NA	NA	NA	NA
2	2922	28.491%	10629.00293	7,136.05
3	3071	29.943%	11171.00205	7,499.94
4	2163	21.090%	7868.081221	5,282.44
5	1181	11.515%	4295.979622	2,884.21
6	511	4.982%	1858.80236	1,247.95
7	220	2.145%	800.2671607	537.28
8	109	1.063%	396.4960023	266.20
9	43	0.419%	156.4158541	105.01
10	16	0.156%	58.20124805	39.07
11	7	0.068%	25.46304602	17.10
12	4	0.039%	14.55031201	9.77
13	2	0.020%	7.275156006	4.88
14	0	0.000%	0	-
15	1	0.010%	3.637578003	2.44
16	1	0.010%	3.637578003	2.44
17	1	0.010%	3.637578003	2.44
18	0	0.000%	0	-
19	1	0.010%	3.637578003	2.44
20	0	0.000%	0	-
21	1	0.010%	3.637578003	2.44
22	0	0.000%	0	-
23	0	0.000%	0	-
24	1	0.010%	3.637578003	2.44
25	0	0.000%	0	-
26	0	0.000%	0	-
27	0	0.000%	0	-
28	1	0.010%	3.637578003	2.44
<b>TOTAL</b>	10,256.00		37,307.00	25,047.00

TABLE 4: Estimated Frequency Dist. CY2013 Households WITHOUT child Support Case (12,260)	TABLE 5: Estimated Frequency Dist. Expected Compliance Total Households (93.29% of 37,307)	TABLE 6: Estimated Frequency Dist. Expected Compliance Households WITH a Child Support Case (93.29% of 25,047)	TABLE 7: Estimated Frequency Dist. Expected Compliance Households WITHOUT a Child Support Case (93.29% of 12,206)
%	%	%	%
NA	NA	NA	NA
3,492.95	9,915.80	6,657.22	3,258.58
3,671.07	10,421.43	6,996.69	3,424.74
2,585.65	7,340.13	4,927.98	2,412.15
1,411.76	4,007.72	2,690.68	1,317.04
610.85	1,734.08	1,164.22	569.86
262.99	746.57	501.23	245.34
130.30	369.89	248.34	121.56
51.40	145.92	97.97	47.95
19.13	54.30	36.45	17.84
8.37	23.75	15.95	7.81
4.78	13.57	9.11	4.46
2.39	6.79	4.56	2.23
-	-	-	-
1.20	3.39	2.28	1.12
1.20	3.39	2.28	1.12
1.20	3.39	2.28	1.12
-	-	-	-
1.20	3.39	2.28	1.12
-	-	-	-
1.20	3.39	2.28	1.12
-	-	-	-
-	-	-	-
1.20	3.39	2.28	1.12
-	-	-	-
-	-	-	-
-	-	-	-
1.20	3.39	2.28	1.12
12,260.00	34,803.70	23,366.35	11,437.35

TABLE 8: Estimated Frequency Dist. Expected Sanction for Total Households (6.71% of 37,307)	TABLE 9: Estimated Frequency Dist. Expected Sanction for Households WITH a Child Support Case (6.71% of 25,047)	TABLE 10: Estimated Frequency Dist. Expected Sanction for Households WITHOUT a Child Support Case (6.71% of 12,260)	TABLE 11: Estimated Frequency Dist.for 75% of 12,260	TABLE 12: Estimated Frequency Dist.for 50% of 12,260	TABLE 13: Estimated Frequency Dist.for 25% of 12,260
%	%	%	%	%	%
NA	NA	NA	NA	NA	NA
713.2060963	478.83	234.3771073	2619.714314	1746.476209	873.2381045
749.5742374	503.25	246.3285751	2753.30002	1835.533346	917.7666732
527.9482499	354.45	173.4968114	1939.234107	1292.822738	646.411369
288.2602326	193.53	94.72941946	1058.823615	705.8824103	352.9412051
124.7256383	83.74	40.98791985	458.1362129	305.424142	152.712071
53.69792648	36.05	17.64646256	197.2406396	131.4937598	65.74687988
26.60488176	17.86	8.743020086	97.72377145	65.14918097	32.57459048
10.49550381	7.05	3.449081318	38.55157956	25.70105304	12.85052652
3.905303744	2.62	1.283379095	14.34477379	9.563182527	4.781591264
1.708570388	1.15	0.561478354	6.275838534	4.183892356	2.091946178
0.976325936	0.66	0.320844774	3.586193448	2.390795632	1.195397816
0.488162968	0.33	0.160422387	1.793096724	1.195397816	0.597698908
0	-	0	0	0	0
0.244081484	0.16	0.080211193	0.896548362	0.597698908	0.298849454
0.244081484	0.16	0.080211193	0.896548362	0.597698908	0.298849454
0.244081484	0.16	0.080211193	0.896548362	0.597698908	0.298849454
0	-	0	0	0	0
0.244081484	0.16	0.080211193	0.896548362	0.597698908	0.298849454
0	-	0	0	0	0
0.244081484	0.16	0.080211193	0.896548362	0.597698908	0.298849454
0	-	0	0	0	0
0	-	0	0	0	0
0.244081484	0.16	0.080211193	0.896548362	0.597698908	0.298849454
0	-	0	0	0	0
0	-	0	0	0	0
0	-	0	0	0	0
0.244081484	0.16	0.080211193	0.896548362	0.597698908	0.298849454
2,503.30	1,680.65	822.646			

TABLE A: Impact of Sanction if all Households Open an ORS Case (6.71% Expected Sanction Rate, 37,307 Households)				TABLE B: Impact of Sanction for Households CY2013 WITH ORS Case (6.71% Expected Sanction Rate, 25,047 Households)			
<i>Monthly Aggregate Benefit Pre Sanction</i>	<i>Monthly Aggregate Benefit Post Sanction</i>	<i>Monthly Aggregate Family Loss in FS \$</i>	<i>Annual Aggregate Family Loss in FS \$</i>	<i>Monthly Aggregate Benefit Pre Sanction</i>	<i>Monthly Aggregate Benefit Post Sanction</i>	<i>Monthly Aggregate Family Loss in FS \$</i>	<i>Annual Aggregate Family Loss in FS \$</i>
NA	NA	NA	NA	NA	NA	NA	NA
\$ 204,521.00	\$ 135,213.24	\$ 69,307.76	\$ 831,693.09	\$ 137,310.36	\$ 90,778.84	\$ 46,531.52	\$ 558,378.24
\$ 285,515.54	\$ 214,950.03	\$ 70,565.50	\$ 846,786.05	\$ 191,688.09	\$ 144,312.15	\$ 47,375.94	\$ 568,511.27
\$ 241,461.76	\$ 201,097.40	\$ 40,364.36	\$ 484,372.33	\$ 162,111.47	\$ 135,011.83	\$ 27,099.64	\$ 325,195.64
\$ 154,910.71	\$ 131,838.34	\$ 23,072.36	\$ 276,868.37	\$ 104,003.23	\$ 88,513.01	\$ 15,490.22	\$ 185,882.60
\$ 77,499.29	\$ 67,027.41	\$ 10,471.88	\$ 125,662.54	\$ 52,031.11	\$ 45,000.55	\$ 7,030.56	\$ 84,366.73
\$ 37,584.40	\$ 33,365.64	\$ 4,218.76	\$ 50,625.08	\$ 25,233.24	\$ 22,400.87	\$ 2,832.37	\$ 33,988.43
\$ 20,445.24	\$ 18,621.36	\$ 1,823.88	\$ 21,886.56	\$ 13,726.43	\$ 12,501.92	\$ 1,224.51	\$ 14,694.10
\$ 8,846.00	\$ 8,065.55	\$ 780.45	\$ 9,365.37	\$ 5,938.99	\$ 5,415.01	\$ 523.97	\$ 6,287.68
\$ 3,642.92	\$ 3,291.54	\$ 351.38	\$ 4,216.57	\$ 2,445.76	\$ 2,209.86	\$ 235.91	\$ 2,830.90
\$ 1,784.97	\$ 1,593.78	\$ 191.19	\$ 2,294.30	\$ 1,198.38	\$ 1,070.02	\$ 128.36	\$ 1,540.34
\$ 1,193.31	\$ 1,019.98	\$ 173.33	\$ 2,079.99	\$ 801.16	\$ 684.79	\$ 116.37	\$ 1,396.46
\$ 386.14	\$ 596.66	\$ (210.52)	\$ (2,526.24)	\$ 259.24	\$ 400.58	\$ (141.34)	\$ (1,696.06)
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
\$ 408.59	\$ 300.83	\$ 107.76	\$ 1,293.14	\$ 274.32	\$ 201.97	\$ 72.35	\$ 868.18
\$ 580.67	\$ 408.59	\$ 172.08	\$ 2,064.93	\$ 389.85	\$ 274.32	\$ 115.53	\$ 1,386.34
\$ 456.92	\$ 580.67	\$ (123.75)	\$ (1,484.99)	\$ 306.77	\$ 389.85	\$ (83.08)	\$ (996.99)
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
\$ 514.04	\$ 477.11	\$ 36.93	\$ 443.15	\$ 345.11	\$ 320.32	\$ 24.79	\$ 297.52
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
\$ 550.89	\$ 534.22	\$ 16.67	\$ 200.05	\$ 369.86	\$ 358.66	\$ 11.19	\$ 134.31
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
\$ 742.25	\$ 591.26	\$ 150.99	\$ 1,811.87	\$ 498.33	\$ 396.96	\$ 101.37	\$ 1,216.44
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
\$ 992.92	\$ 802.81	\$ 190.12	\$ 2,281.38	\$ 666.62	\$ 538.99	\$ 127.64	\$ 1,531.66
		\$ 221,661.13	\$ 2,659,933.54			\$ 148,817.82	\$ 1,785,813.80

TABLE C: Impact of Sanction for 100% Cooperation of Households  
CY2013 WITHOUT an ORS Case (6.71% Expected Sanction Rate, 12,260 Households)

<i>Monthly Aggregate Benefit Pre Sanction</i>	<i>Monthly Aggregate Benefit Post Sanction</i>	<i>Monthly Aggregate Family Loss in FS \$</i>	<i>Annual Aggregate Family Loss in FS \$</i>
NA	NA	NA	NA
\$ 67,210.64	\$ 44,434.41	\$ 22,776.24	\$ 273,314.86
\$ 93,827.44	\$ 70,637.88	\$ 23,189.56	\$ 278,274.77
\$ 79,350.29	\$ 66,085.56	\$ 13,264.72	\$ 159,176.69
\$ 50,907.48	\$ 43,325.33	\$ 7,582.15	\$ 90,985.77
\$ 25,468.18	\$ 22,026.86	\$ 3,441.32	\$ 41,295.81
\$ 12,351.16	\$ 10,964.77	\$ 1,386.39	\$ 16,636.65
\$ 6,718.81	\$ 6,119.44	\$ 599.37	\$ 7,192.46
\$ 2,907.01	\$ 2,650.54	\$ 256.47	\$ 3,077.69
\$ 1,197.15	\$ 1,081.68	\$ 115.47	\$ 1,385.67
\$ 586.58	\$ 523.75	\$ 62.83	\$ 753.97
\$ 392.15	\$ 335.19	\$ 56.96	\$ 683.54
\$ 126.89	\$ 196.08	\$ (69.18)	\$ (830.19)
\$ -	\$ -	\$ 0	\$ -
\$ 134.27	\$ 98.86	\$ 35.41	\$ 424.96
\$ 190.82	\$ 134.27	\$ 56.55	\$ 678.59
\$ 150.16	\$ 190.82	\$ (40.67)	\$ (488.00)
\$ -	\$ -	\$ 0	\$ -
\$ 168.92	\$ 156.79	\$ 12.14	\$ 145.63
\$ -	\$ -	\$ 0	\$ -
\$ 181.04	\$ 175.56	\$ 5.48	\$ 65.74
\$ -	\$ -	\$ 0	\$ -
\$ -	\$ -	\$ 0	\$ -
\$ 243.92	\$ 194.30	\$ 49.62	\$ 595.42
\$ -	\$ -	\$ 0	\$ -
\$ -	\$ -	\$ 0	\$ -
\$ -	\$ -	\$ 0	\$ -
\$ 326.30	\$ 263.82	\$ 62.48	\$ 749.72
		\$ 72,843.31	\$ <b>874,119.74</b>

TABLE D: Impact of Sanction if 75% of Households CY2013 WITHOUT an ORS Case Cooperate (6.71% Expected Sanction Rate, 0.75\*12,260 Households &amp; 0.25\*12,260 Sanctioned)

75%*12,260 with 6.71% Expected Sanction Rate				25%*12,260 Will Receive a Sanction for Not Opening an ORS Case			
Monthly Aggregate Benefit Pre Sanction	Monthly Aggregate Benefit Post Sanction	Monthly Aggregate Family Loss in FS \$	Annual Aggregate Family Loss in FS \$	Monthly Aggregate Benefit Pre Sanction	Monthly Aggregate Benefit Post Sanction	Monthly Aggregate Family Loss in FS \$	Annual Aggregate Family Loss in FS \$
NA	NA	NA	NA	NA	NA	NA	NA
\$ 50,407.98	\$ 33,325.80	\$ 17,082.18	\$ 204,986.14	\$ 250,412.23	\$ 165,552.93	\$ 84,859.31	\$ 1,018,311.68
\$ 70,370.58	\$ 52,978.41	\$ 17,392.17	\$ 208,706.08	\$ 349,580.64	\$ 263,181.37	\$ 86,399.27	\$ 1,036,791.25
\$ 59,512.72	\$ 49,564.17	\$ 9,948.54	\$ 119,382.52	\$ 295,641.90	\$ 246,220.43	\$ 49,421.48	\$ 593,057.71
\$ 38,180.61	\$ 32,494.00	\$ 5,686.61	\$ 68,239.33	\$ 189,670.19	\$ 161,420.75	\$ 28,249.43	\$ 338,993.20
\$ 19,101.13	\$ 16,520.14	\$ 2,580.99	\$ 30,971.86	\$ 94,888.89	\$ 82,067.29	\$ 12,821.60	\$ 153,859.20
\$ 9,263.37	\$ 8,223.58	\$ 1,039.79	\$ 12,477.49	\$ 46,017.74	\$ 40,852.36	\$ 5,165.38	\$ 61,984.53
\$ 5,039.11	\$ 4,589.58	\$ 449.53	\$ 5,394.35	\$ 25,032.83	\$ 22,799.70	\$ 2,233.13	\$ 26,797.55
\$ 2,180.26	\$ 1,987.90	\$ 192.36	\$ 2,308.27	\$ 10,830.90	\$ 9,875.33	\$ 955.57	\$ 11,466.80
\$ 897.86	\$ 811.26	\$ 86.60	\$ 1,039.25	\$ 4,460.33	\$ 4,030.10	\$ 430.23	\$ 5,162.70
\$ 439.94	\$ 392.82	\$ 47.12	\$ 565.47	\$ 2,185.49	\$ 1,951.39	\$ 234.09	\$ 2,809.11
\$ 294.11	\$ 251.39	\$ 42.72	\$ 512.65	\$ 1,461.07	\$ 1,248.85	\$ 212.23	\$ 2,546.71
\$ 95.17	\$ 147.06	\$ (51.89)	\$ (622.64)	\$ 472.78	\$ 730.54	\$ (257.76)	\$ (3,093.09)
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 100.71	\$ 74.15	\$ 26.56	\$ 318.72	\$ 500.27	\$ 368.33	\$ 131.94	\$ 1,583.30
\$ 143.12	\$ 100.71	\$ 42.41	\$ 508.94	\$ 710.96	\$ 500.27	\$ 210.69	\$ 2,528.27
\$ 112.62	\$ 143.12	\$ (30.50)	\$ (366.00)	\$ 559.45	\$ 710.96	\$ (151.52)	\$ (1,818.20)
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 126.69	\$ 117.59	\$ 9.10	\$ 109.22	\$ 629.38	\$ 584.16	\$ 45.22	\$ 542.59
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 135.78	\$ 131.67	\$ 4.11	\$ 49.31	\$ 674.50	\$ 654.09	\$ 20.41	\$ 244.94
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 182.94	\$ 145.73	\$ 37.21	\$ 446.57	\$ 908.80	\$ 723.93	\$ 184.87	\$ 2,218.42
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ 0	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 244.72	\$ 197.87	\$ 46.86	\$ 562.29	\$ 1,215.72	\$ 982.95	\$ 232.77	\$ 2,793.29
		\$ 54,632.48	\$ 655,589.81			\$ 271,398.33	\$ 3,256,779.96

TABLE E: Impact of Sanction if 50% of Households CY2013 WITHOUT an ORS Case Cooperate (6.71% Expected Sanction Rate, 0.5\*12,260 Households & 0.5\*12,260 Sanctioned)

50%*12,260 with 6.71% Expected Sanction Rate				50%*12,260 Will Receive a Sanction for Not Opening an ORS			
<i>Monthly Aggregate Benefit Pre Sanction</i>	<i>Monthly Aggregate Benefit Post Sanction</i>	<i>Monthly Aggregate Family Loss in FS \$</i>	<i>Annual Aggregate Family Loss in FS \$</i>	<i>Monthly Aggregate Benefit Pre Sanction</i>	<i>Monthly Aggregate Benefit Post Sanction</i>	<i>Monthly Aggregate Family Loss in FS \$</i>	<i>Annual Aggregate Family Loss in FS \$</i>
NA	NA	NA	NA	NA	NA	NA	NA
\$ 33,605.32	\$ 22,217.20	\$ 11,388.12	\$ 136,657.43	\$ 500,824.47	\$ 331,105.85	\$ 169,718.61	\$ 2,036,623.37
\$ 46,913.72	\$ 35,318.94	\$ 11,594.78	\$ 139,137.39	\$ 699,161.29	\$ 526,362.74	\$ 172,798.54	\$ 2,073,582.51
\$ 39,675.14	\$ 33,042.78	\$ 6,632.36	\$ 79,588.34	\$ 591,283.81	\$ 492,440.85	\$ 98,842.95	\$ 1,186,115.42
\$ 25,453.74	\$ 21,662.66	\$ 3,791.07	\$ 45,492.89	\$ 379,340.37	\$ 322,841.50	\$ 56,498.87	\$ 677,986.39
\$ 12,734.09	\$ 11,013.43	\$ 1,720.66	\$ 20,647.90	\$ 189,777.77	\$ 164,134.57	\$ 25,643.20	\$ 307,718.39
\$ 6,175.58	\$ 5,482.39	\$ 693.19	\$ 8,318.32	\$ 92,035.47	\$ 81,704.72	\$ 10,330.76	\$ 123,969.07
\$ 3,359.41	\$ 3,059.72	\$ 299.69	\$ 3,596.23	\$ 50,065.65	\$ 45,599.39	\$ 4,466.26	\$ 53,595.11
\$ 1,453.51	\$ 1,325.27	\$ 128.24	\$ 1,538.85	\$ 21,661.80	\$ 19,750.67	\$ 1,911.13	\$ 22,933.61
\$ 598.58	\$ 540.84	\$ 57.74	\$ 692.83	\$ 8,920.66	\$ 8,060.21	\$ 860.45	\$ 10,325.40
\$ 293.29	\$ 261.88	\$ 31.42	\$ 376.98	\$ 4,370.97	\$ 3,902.79	\$ 468.19	\$ 5,618.22
\$ 196.08	\$ 167.60	\$ 28.48	\$ 341.77	\$ 2,922.15	\$ 2,497.70	\$ 424.45	\$ 5,093.42
\$ 63.45	\$ 98.04	\$ (34.59)	\$ (415.09)	\$ 945.56	\$ 1,461.07	\$ (515.52)	\$ (6,186.18)
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 67.14	\$ 49.43	\$ 17.71	\$ 212.48	\$ 1,000.55	\$ 736.66	\$ 263.88	\$ 3,166.61
\$ 95.41	\$ 67.14	\$ 28.27	\$ 339.29	\$ 1,421.93	\$ 1,000.55	\$ 421.38	\$ 5,056.53
\$ 75.08	\$ 95.41	\$ (20.33)	\$ (244.00)	\$ 1,118.89	\$ 1,421.93	\$ (303.03)	\$ (3,636.40)
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 84.46	\$ 78.39	\$ 6.07	\$ 72.82	\$ 1,258.75	\$ 1,168.32	\$ 90.43	\$ 1,085.18
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 90.52	\$ 87.78	\$ 2.74	\$ 32.87	\$ 1,349.01	\$ 1,308.18	\$ 40.82	\$ 489.87
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 121.96	\$ 97.15	\$ 24.81	\$ 297.71	\$ 1,817.60	\$ 1,447.87	\$ 369.74	\$ 4,436.84
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 163.15	\$ 131.91	\$ 31.24	\$ 374.86	\$ 2,431.44	\$ 1,965.89	\$ 465.55	\$ 5,586.57
		\$ 36,421.66	\$ 874,119.74			\$ 542,796.66	\$ 6,513,559.92

TABLE F: Impact of Sanction for 25% of Households CY2013 WITHOUT an ORS Case (6.71% Expected Sanction Rate, 0.25\*12,260 Households)

25%*12,260 with 6.71% Expected Sanction Rate				75%*12,260 Will Receive a Sanction for Not Opening an ORS Case			
<i>Monthly Aggregate Benefit Pre Sanction</i>	<i>Monthly Aggregate Benefit Post Sanction</i>	<i>Monthly Aggregate Family Loss in FS \$</i>	<i>Annual Aggregate Family Loss in FS \$</i>	<i>Monthly Aggregate Benefit Pre Sanction</i>	<i>Monthly Aggregate Benefit Post Sanction</i>	<i>Monthly Aggregate Family Loss in FS \$</i>	<i>Annual Aggregate Family Loss in FS \$</i>
NA	NA	NA	NA	NA	NA	NA	NA
\$ 16,802.66	\$ 11,108.60	\$ 5,694.06	\$ 68,328.71	\$ 751,236.70	\$ 496,658.78	\$ 254,577.92	\$ 3,054,935.05
\$ 23,456.86	\$ 17,659.47	\$ 5,797.39	\$ 69,568.69	\$ 1,048,741.93	\$ 789,544.12	\$ 259,197.81	\$ 3,110,373.76
\$ 19,837.57	\$ 16,521.39	\$ 3,316.18	\$ 39,794.17	\$ 886,925.71	\$ 738,661.28	\$ 148,264.43	\$ 1,779,173.13
\$ 12,726.87	\$ 10,831.33	\$ 1,895.54	\$ 22,746.44	\$ 569,010.56	\$ 484,262.26	\$ 84,748.30	\$ 1,016,979.59
\$ 6,367.04	\$ 5,506.71	\$ 860.33	\$ 10,323.95	\$ 284,666.66	\$ 246,201.86	\$ 38,464.80	\$ 461,577.59
\$ 3,087.79	\$ 2,741.19	\$ 346.60	\$ 4,159.16	\$ 138,053.21	\$ 122,557.07	\$ 15,496.13	\$ 185,953.60
\$ 1,679.70	\$ 1,529.86	\$ 149.84	\$ 1,798.12	\$ 75,098.48	\$ 68,399.09	\$ 6,699.39	\$ 80,392.66
\$ 726.75	\$ 662.63	\$ 64.12	\$ 769.42	\$ 32,492.71	\$ 29,626.00	\$ 2,866.70	\$ 34,400.41
\$ 299.29	\$ 270.42	\$ 28.87	\$ 346.42	\$ 13,380.98	\$ 12,090.31	\$ 1,290.68	\$ 15,488.10
\$ 146.65	\$ 130.94	\$ 15.71	\$ 188.49	\$ 6,556.46	\$ 5,854.18	\$ 702.28	\$ 8,427.33
\$ 98.04	\$ 83.80	\$ 14.24	\$ 170.88	\$ 4,383.22	\$ 3,746.55	\$ 636.68	\$ 7,640.13
\$ 31.72	\$ 49.02	\$ (17.30)	\$ (207.55)	\$ 1,418.34	\$ 2,191.61	\$ (773.27)	\$ (9,279.28)
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 33.57	\$ 24.72	\$ 8.85	\$ 106.24	\$ 1,500.82	\$ 1,105.00	\$ 395.83	\$ 4,749.91
\$ 47.71	\$ 33.57	\$ 14.14	\$ 169.65	\$ 2,132.89	\$ 1,500.82	\$ 632.07	\$ 7,584.80
\$ 37.54	\$ 47.71	\$ (10.17)	\$ (122.00)	\$ 1,678.34	\$ 2,132.89	\$ (454.55)	\$ (5,454.60)
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 42.23	\$ 39.20	\$ 3.03	\$ 36.41	\$ 1,888.13	\$ 1,752.48	\$ 135.65	\$ 1,627.77
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 45.26	\$ 43.89	\$ 1.37	\$ 16.44	\$ 2,023.51	\$ 1,962.28	\$ 61.23	\$ 734.81
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 60.98	\$ 48.58	\$ 12.40	\$ 148.86	\$ 2,726.40	\$ 2,171.80	\$ 554.60	\$ 6,655.26
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
\$ 81.57	\$ 65.96	\$ 15.62	\$ 187.43	\$ 3,647.16	\$ 2,948.84	\$ 698.32	\$ 8,379.86
		\$ 18,210.83	\$ 218,529.94			\$ 814,194.99	\$ 9,770,339.89



TABLE G: Impact of Sanction for 0% of Households CY2013 WITHOUT an ORS Case  
(Sanction for 100%\*12,260 Households)

<i>Monthly Aggregate Benefit Pre Sanction</i>	<i>Monthly Aggregate Benefit Post Sanction</i>	<i>Monthly Aggregate Family Loss in FS \$</i>	<i>Annual Aggregate Family Loss in FS \$</i>
NA	NA	NA	NA
\$ 1,001,648.93	\$ 662,211.71	\$ 339,437.23	\$ 4,073,246.73
\$ 1,398,322.57	\$ 1,052,725.49	\$ 345,597.08	\$ 4,147,165.02
\$ 1,182,567.61	\$ 984,881.71	\$ 197,685.90	\$ 2,372,230.84
\$ 758,680.74	\$ 645,683.01	\$ 112,997.73	\$ 1,355,972.78
\$ 379,555.54	\$ 328,269.14	\$ 51,286.40	\$ 615,436.78
\$ 184,070.94	\$ 163,409.43	\$ 20,661.51	\$ 247,938.13
\$ 100,131.30	\$ 91,198.78	\$ 8,932.52	\$ 107,190.21
\$ 43,323.61	\$ 39,501.34	\$ 3,822.27	\$ 45,867.22
\$ 17,841.31	\$ 16,120.41	\$ 1,720.90	\$ 20,650.80
\$ 8,741.94	\$ 7,805.57	\$ 936.37	\$ 11,236.44
\$ 5,844.30	\$ 4,995.40	\$ 848.90	\$ 10,186.84
\$ 1,891.12	\$ 2,922.15	\$ (1,031.03)	\$ (12,372.37)
\$ -	\$ -	\$ -	\$ -
\$ 2,001.10	\$ 1,473.33	\$ 527.77	\$ 6,333.22
\$ 2,843.85	\$ 2,001.10	\$ 842.76	\$ 10,113.07
\$ 2,237.78	\$ 2,843.85	\$ (606.07)	\$ (7,272.80)
\$ -	\$ -	\$ -	\$ -
\$ 2,517.51	\$ 2,336.64	\$ 180.86	\$ 2,170.36
\$ -	\$ -	\$ -	\$ -
\$ 2,698.01	\$ 2,616.37	\$ 81.65	\$ 979.75
\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -
\$ 3,635.20	\$ 2,895.73	\$ 739.47	\$ 8,873.68
\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -
\$ 4,862.88	\$ 3,931.78	\$ 931.10	\$ 11,173.14
		\$ 1,085,593.32	\$ <b>13,027,119.85</b>

Cooperation of Total Population (37,307)	Cooperation of Families w/out ORS case CY2013 (12,260)	Annual Aggregate Food Stamp Loss Due to Sanction		Number of Families Sanctioned	Percent of Families Sanctioned
100.00%	100.00%	25,047 CY2013 Families with an ORS Case	\$ 1,785,813.80	2503.2997	6.71%
		% CY2013 Families Without an ORS Case That Would Open One	\$ 874,119.74		
		100% of 12,260			
		% CY2013 Families Without an ORS Case That Would Not Open One	\$ -		
		0% of 12,260			
		<b>TOTAL</b>	<b>\$ 2,659,933.54</b>		
91.78%	75.00%	25,047 CY2013 Families with an ORS Case	\$ 1,785,813.80	5362.6382	14.37%
		% CY2013 Families Without an ORS Case That Would Open One	\$ 655,589.81		
		75% of 12,260			
		% CY2013 Families Without an ORS Case That Would Not Open One	\$ 3,256,779.96		
		25% of 12,260			
		<b>TOTAL</b>	<b>\$ 5,698,183.57</b>		
83.57%	50.00%	25,047 CY2013 Families with an ORS Case	\$ 1,785,813.80	8221.9767	22.04%
		% CY2013 Families Without an ORS Case That Would Open One	\$ 874,119.74		
		50% of 12,260			
		% CY2013 Families Without an ORS Case That Would Not Open One	\$ 6,513,559.92		
		50% of 12,260			
		<b>TOTAL</b>	<b>\$ 9,173,493.46</b>		
75.35%	25.00%	25,047 CY2013 Families with an ORS Case	\$ 1,785,813.80	11081.3152	29.70%
		% CY2013 Families Without an ORS Case That Would Open One	\$ 218,529.94		
		25% of 12,260			
		% CY2013 Families Without an ORS Case That Would Not Open One	\$ 9,770,339.89		
		75% of 12,260			
		<b>TOTAL</b>	<b>\$ 11,774,683.62</b>		
67.10%	0.00%	25,047 CY2013 Families with an ORS Case	\$ 1,785,813.80	13940.6537	37.37%
		% CY2013 Families Without an ORS Case That Would Open One	\$ -		
		0% of 12,260			
		% CY2013 Families Without an ORS Case That Would Not Open One	\$ 13,027,119.85		
		100% of 12,260			
		<b>TOTAL</b>	<b>\$ 14,812,933.65</b>		

# APPENDIX D

# FLORIDA FOOD STAMP POLICIES

Florida has had a policy from 2002-present

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Chapter: 1400	Technical Requirements	Program: FS
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## **1410.1100 LIVING ARRANGEMENTS (FS)**

This section describes policies relating to eligibility and living arrangements.

### **1410.1101 Residents of Institutions (FS)**

Residents of institutions, with certain exceptions, are not eligible to participate in the Food Stamp Program. Individuals are considered residents of institutions when the institution provides them with the majority of their meals (50% of three meals a day) as a part of its normal services, and the institution has not been authorized by FNS to accept food stamps.

Individuals of any age who are prisoners, inmates, detainees, or convicts placed under detention or custody of a Federal, State, or local penal, correctional, or other detention facility or institution for more than 30 days are not eligible for food stamp benefits.

Students who purchase a majority of their meals at one of the school's facilities are considered residents of an institution regardless of whether obtaining meals at a school facility is mandatory or optional.

Individuals who do not receive their meals from the institution but who prepare their own food, are participating in the Delivered Meals Program, or a Communal Dining Program, are eligible for food stamps if the institution is not authorized to accept food stamps.

### **1410.1102 Exemptions from Institutional Provisions (FS)**

The following individuals residing in group facilities are not considered residents of an institution for the purpose of qualifying for the Food Stamp Program:

1. any narcotics addict or alcoholic who resides at a facility or treatment center under the supervision of a Drug/Alcoholic Treatment and Rehabilitation Program unless the individual of any age is under detention or custody of a Federal, State, or local penal, correctional, or other detention facility or institution for more than 30 days;
2. residents of federally subsidized housing for the elderly under either Section 202 of the Housing Act of 1959 or Section 236 of the National Housing Act;
3. certain blind/disabled individuals who live in authorized small group living arrangements licensed for 16 residents or fewer;
4. individuals or individuals with children temporarily residing in a shelter for battered persons (such individuals shall be considered individual household units for purposes of applying for and participating in the program); or
5. residents of public or private nonprofit shelters for homeless individuals.

Chapter 2200 describes special provisions for the residents of these facilities.

## **1410.1700 CHILD SUPPORT COOPERATION (FS)**

Under state and federal law, the state must take action to locate non-custodial parents, establish paternity, and secure all child support, medical support, or other benefits for children receiving public assistance.

Applicants for and recipients of food stamps (including caretaker relatives receiving food stamps) must cooperate with Child Support Enforcement (CSE) as a condition of eligibility, unless it is determined that good cause for non-cooperation exists.

### **1410.1702 Child Support Cooperation Requirements (FS)**

Cooperation with Child Support Enforcement (CSE) by a parent or caretaker relative is required when:

1. the parent or caretaker is applying for or receiving food stamps,
2. paternity has not been established and the alleged father is not in the home,
3. one or both parents are absent from the home, or
4. good cause for non-cooperation does not exist as determined by CSE.

The parent or caretaker relative must cooperate with the following:

1. identifying and locating the parent(s) of the child,
2. establishing the paternity of the child, and
3. obtaining child support payments for the child or amending a court order.

#### **1410.1704 Definition of Cooperation (FS)**

Cooperation includes the following:

1. providing complete information required to obtain child support (if information about the non-custodial parent is known by the individual but is withheld, the individual may face a possible penalty of perjury);
2. completing and signing affidavits attesting to paternity of the child; and
3. making court appearances and providing testimony in paternity hearings and support actions.

#### **1410.1705.01 Definition of Non-Custodial Parent (FS)**

The term "non-custodial parent" refers to non-custodial (absent) legal fathers, non-custodial (absent) mothers, and all putative (non-legal biological) fathers.

#### **1410.1705.02 Legal Father and Natural Father (FS)**

If both a legal and putative father exists, or the responsibility for support is not clear, the parent or caretaker relative must provide information on both the legal and putative father.

#### **1410.1706 Cooperation by a Pregnant Woman (FS)**

Pregnant women who are receiving food stamps for themselves and other dependent children are required to cooperate with CSE unless they have good cause reasons not to cooperate. A pregnant woman with no other children is not referred for CSE cooperation until the child is born.

#### **1410.1707 Good Cause for Failure to Cooperate (FS)**

Cooperation in establishing paternity and/or securing support may be contrary to the best interest of the family. In those situations, a parent or caretaker relative may have good cause for not cooperating. Child Support Enforcement (CSE) must advise these individuals of reasons for good cause.

The eligibility specialist must refer the individual to CSE even when it appears that good cause exists.

#### **1410.1708 Reasons for Good Cause (FS)**

Accept the good cause determination by Child Support Enforcement. Good cause may exist when cooperation in establishing paternity or securing child support could result in one of the following conditions:

1. physical harm to the child - examples are broken bones, bruises, burns, lacerations, etc.;
2. emotional harm to the child - examples are poor school performance, sleep disturbances, self destructive behavior, eating disorders, etc.;
3. physical harm to the parent or caretaker relative, which reduces the individual's capacity to care for the child adequately (such as life threatening injury); or

4. emotional harm to the parent or caretaker relative to such a degree that the individual's capacity to adequately care for the child is diminished (such as any psychological disorder or dysfunction which has a serious impact on the individual's abilities as caretaker).

Good cause may also exist under the following circumstances:

1. the child was conceived as a result of incest or forcible rape,
2. legal proceedings for the adoption of the child are pending before a court, or
3. the parent or caretaker relative is being assisted by a public or licensed private social agency to determine whether or not to relinquish the child for adoption (this circumstance is valid for three months).

#### **1410.1709 Failure to Cooperate (FS)**

When the parent, including a teen parent or caretaker relative refuses to provide information regarding the non-custodial parent of a child under the age of 18 residing in the home during an application or eligibility review, the eligibility specialist must review child support cooperation requirements with the individual.

**Note:** A pregnant woman with no other deprived children is not subject to child support cooperation until the child's birth.

Deny food stamp assistance for the individual (adult or teen parent) subject to child support cooperation if he/she does not express an intent to claim good cause or the intent to cooperate with Child Support Enforcement and authorize benefits for the other household members, if eligible. A referral to the Department of Revenue, Child Support Enforcement Agency to establish cooperation is not necessary when the individual expresses intent not to cooperate or claim "good cause".

#### **1410.1710 CSE Reports of Failure to Cooperate (FS)**

When Child Support Enforcement (CSE) requests a sanction be imposed because a custodial parent or caretaker relative did not comply with Child Support Enforcement requirements, immediate action will be taken to remove the non-compliant custodial parent or caretaker relative from food stamps, allowing for a 10-day notice of adverse action. The non-cooperative custodial parent will be treated as "technically ineligible" for food stamp budgeting purposes. Refer to passage 2610.0410 for how to treat these individuals.

#### **1410.1711 Ending Sanction (FS)**

Eligibility staff must:

1. Remove the sanction upon Child Support Enforcement's request that the individual complied.
2. Add the individual back into the food stamp assistance group (must meet all other factors of eligibility).
3. Not require an application unless the entire food stamp assistance group is closed.

Remove CSE imposed sanctions for noncooperation without CSE approval in the following situations:

1. When the last child subject to cooperation leaves the home.
2. When the last child subject to cooperation turns 18.
3. When the absent parent, based on established legal paternity, moves into the home and

4. When a non-legal parent moves into the home and completes the DH 432 acknowledging paternity and staff forwards the completed DH 432 to CSE or the Department of Health State Office of Vital Statistics.

The effective date for adding the sanctioned individual is the first month following the date of compliance.

## MICHIGAN FOOD STAMP POLICIES

Michigan has had a policy from 2002-present

### SUPPORT FROM NON-CUSTODIAL PARENTS

**ISSUE DATE: 12/2013**

#### **MFIP:**

Caregivers with children must help get child and spousal support and child care support (if they receive child care assistance) from non-custodial parents. See [0017.15.03 \(Child and Spousal Support Income\)](#).

A caregiver assigns all rights of the unit to child support and spousal maintenance benefits by signing the [Combined Application Form \(CAF\) \(DHS-5223\)](#). A caregiver assigns all rights of the unit to child care support by completing the [Combined Application - Child Care Addendum \(DHS-5223D\)](#) in addition to the Combined Application Form (CAF). See [0012.18 \(Assigning Rights to Support\)](#).

Failure to help get these kinds of supports results in a sanction or loss of benefits, unless the caregiver with children shows good cause for not cooperating. See [0012.21 \(Responsible Relatives Not in the Home\)](#), [0012.21.06 \(Child Support Good Cause Exemptions\)](#), [0012.24 \(Child Support Sanctions\)](#).

Do NOT make a Child Support Referral for a **MARRIED** parent who is called to military duty away from home when there is no breakdown in the marital relationship.

Give the following forms to caregivers and pregnant women at application:

- [Understanding Child Support, a Handbook for Parents \(DHS-3393\)](#).
- [Referral to Support and Collections \(DHS-3163B\)](#).
- [Cooperation with Child Support Enforcement \(DHS-2338\)](#). See [0012.21.06 \(Child Support Good Cause Exemptions\)](#).

Also give these forms to units when they add a child, if they did not get the forms at application.

If the caregiver or pregnant woman fails to complete or return the [Referral to Support and Collections \(DHS-3163B\)](#) form, do not treat it as IV-D non-cooperation or as an incomplete application; that is, do not delay or deny the application. The client has met the requirements of assigning rights to support by signing the CAF. In addition, do not automatically sanction or terminate the client's benefits for IV-D non-cooperation. An MFIP sanction may be imposed only when you are notified by IV-D that the client has failed to cooperate.



The local Child Support agency is responsible for getting child and spousal support and child care support from non-custodial parents. MAXIS sends MFIP referrals to the Child Support agency (PRISM) automatically after the approval, even if the caregiver claims good cause.

**NOTE:** For pregnant women who do not have other child(ren) who need to be referred to child support, do the IV-D referral after the child is born.

Do not delay or deny MFIP pending an action to get support as long as the caregiver or pregnant woman cooperates.

Notify caregivers with children that to cooperate they must:

- Provide information about non-custodial parents, including name, address, Social Security number, telephone number, place of employment or school, date and place of marriages and divorces, and the names and addresses of relatives.
- Appear at interviews, hearings, and legal proceedings.
- Submit to genetic tests including genetic testing of the child, under judicial or administrative order.
- Get any payments or assets due to unit members.

Tell the Child Support agency of all case openings, changes, or closings by entering the appropriate data on MAXIS and re-approving MFIP.

**WB:**

Units on WB do NOT assign rights to child support and spousal maintenance benefits.

**DWP:**

Follow MFIP with the following EXCEPTIONS:

- Units on DWP do NOT assign rights to child support and spousal maintenance benefits as indicated in the 2nd paragraph under MFIP above. If the unit receives child care assistance, child care support must be assigned to the state.

Child support payments must be paid to the Child Support agency and then forwarded to the DWP family. Count child support and spousal maintenance benefits paid to the custodial parent as unearned income for initial eligibility and when determining the DWP benefit amount.

- The \$25 filing fee charged to a NPA (non-public assistance) custodial parent is waived.

**SNAP:**

Count child support payments received by an MFIP caregiver on behalf of a child who is on SNAP only (for example, a child receiving SSI) as income to the child.

**MSA:**

No provisions. MSA participants must follow MA requirements to maintain automatic eligibility for MA. See the [Insurance Affordability Programs/Health Care Manuals](#).

**GA:**

See [0012.21 \(Responsible Relatives Not in the Home\)](#), [0025.30.03 \(Contributions From Parents Not in Home\)](#).

**GRH:**

No provisions.

# MISSISSIPPI FOOD STAMP POLICIES

Mississippi has had a policy from 2002-present

## MISSISSIPPI

### [NONFINANCIAL CRITERIA: CHILD SUPPORT REQUIREMENTS]

Revised 05-01-06

#### GENERAL

As a condition of eligibility for the Food Stamp Program, a natural or adoptive parent or other individual who is living with and exercising parental control over a child under the age of eighteen (18) who has an absent parent must cooperate with the Division of Child Support Enforcement (DCSE) in:

- Locating the absent parent;
- Legally establishing the paternity of the child (if the child is born out of wedlock); and
- Obtaining and/or redirecting support payments for the child or the individual and child.

The individual may be exempt from the child support enforcement requirements if good cause is found for refusing to cooperate as determined by the DCSE. Good cause standards shall take into consideration circumstances under which cooperation may be against the best interest of the child.

The putative/alleged father or identified non-custodial parent of a child under the age of eighteen (18) will not be eligible to participate in the Food Stamp Program if that individual refuses to cooperate with DCSE in:

- establishing the paternity of the child (if the child is born out of wedlock); and
- providing support for the child.

The payment of a fee or other costs for services related to child support enforcement shall not be required for the custodial, non-custodial or putative father for food stamp purposes. Cooperation with the agency will include providing information about the absent parent, appearing at interviews, hearings and legal proceedings, and in some cases, submitting to genetic testing.

#### REFERRAL TO CHILD SUPPORT ENFORCEMENT

At the time of application, reevaluation, or any time a child under age 18 is added to the food stamp household, the worker must explain the child support requirements, determine if an absent parent is involved, and document the absent parent information on the application, Form MDHS-EA-900A and MAVERICS as needed. Form MDHS-EA-941, Notice of Child Support Enforcement, must be provided to the applicant/recipient for an explanation of child support requirements. (See Generic Forms Manual for form and instructions.) The referral to Child Support Enforcement is made by the completion of child support screens in MAVERICS (SPRD, CSEA, etc.) which interfaces to the METSS system. (See Volume X, Chapter 3, for completion of appropriate child support screens.) If the child(ren) is in an active TANF case, the referral to

METSS is completed by that program.

The case record (MDHS-EA-900) and MAVERICS must identify each child's custodial parent and absent parent. When there is no legal parent in the home with the child, the person exercising parental control must be identified. If there is no relative or other person actively involved in the parental role, the food stamp case head will be assigned to the parental role and must cooperate with child support.

A manual referral form, MDHS-EA/CS-943/643, CHILD SUPPORT ENFORCEMENT Cooperation Verification Request, will be required when a food stamp or combination TANF and food stamp case closes and an outstanding noncompliance with child support is involved. Verification must be received from Child Support Enforcement of compliance or that good cause has been approved before the individual can be approved unless child support requirements no longer apply.

**NOTE:** The Food Stamp Program does not require assignment of support rights to the State and there is no recovery of benefits as is required in the TANF Program.

In a food stamp household in which a non-custodial (absent) parent resides, no referral will be made to DCSE, but as the DCSE identifies the non-custodial parent's failure to cooperate they will inform the DEA worker of noncompliance and the non-custodial parent should be disqualified.

#### **PENALTY FOR FAILURE TO COOPERATE**

The custodial parent, non-custodial parent or responsible individual will be disqualified for failure without good cause to cooperate with Child Support Enforcement if:

1. The individual states at the time of application that he/she does not wish to cooperate with child support requirements; or
2. It is known to the agency that the individual has not cooperated with the child support requirements; or
3. The division is notified by Child Support that the individual has failed to cooperate without good cause.

The worker must issue a notice of adverse action for disqualification of the individual. If disqualification of the individual causes ineligibility of the household, the case must be closed rather than only disqualifying the individual. The penalty must be applied unless a request for a fair hearing is received. (See Chapter 10, HEARINGS.)

See Chapter 7, EXCLUDED HOUSEHOLD MEMBERS, for treatment of income and resources of the disqualified individual. The participation code for child support noncompliance is DC.

In instances when DCSE notifies Economic Assistance that a person named as the father of a child in the household has been excluded as the natural parent, MAVERICS notice X709, Request for Information-Child Support/Parent Excluded is sent to the household. The notice informs the household that failure without good cause to provide information on the natural parent or to contact the county office will result in disqualification for the custodial parent due to non-cooperation with DCSE.

#### ENDING DISQUALIFICATION

When Child Support or METSS notifies the worker that the noncompliant individual has cooperated with DCSE, the individual will be added to the SNAP household effective the month after the month of notification in an active case. In a reapplication, the individual must comply prior to approval of the individual. MDHS-EA-943/643, Child Support Cooperation Verification Request, must be sent at the time of reapplication and verification of cooperation must be received prior to reapproval of the individual if the individual has a prior noncooperation status in the MAVERICS/METSS system. If the verification of cooperation cannot be obtained prior to the timely processing date, the application should be handled with the person still disqualified so the other household members may receive benefits. If the expedited household will not be eligible unless the disqualified individual is included, the household would lose entitlement to expedited services and the case should be processed within the regular 30-day timeliness standard.

#### CHILD SUPPORT COURT ORDERS

Court orders for support initiated by the Child Support Enforcement office will usually include the requirement that collections be made through the IV-D office. The Child Support Office will also petition the court to modify existing orders to redirect the support to the IV-D office for collections and disbursement when the household is receiving support directly from a non-custodial parent at the time of referral. The client is informed via the MDHS-EA-941 that they must redirect child support through the IV-D office.

# IDAHO FOOD STAMP POLICIES

Idaho had a policy from 2004-2005 (5 years)

## ***Table of Contents***

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### **16.03.04 - Rules Governing the Food Stamp Program in Idaho**

#### **113. HOUSEHOLD COOPERATION.**

The household must cooperate with the Department. The application must be denied if the household refuses to cooperate. Refusal to cooperate includes failing to act without a sound and timely excuse. Giving false information on purpose is failure to cooperate. The Department must show false information was given on purpose before denying the application. The household is ineligible if it refuses to cooperate in a six-month or twelve-month contact, recertification, program review or evaluation. If an application is denied or Food Stamps are stopped for refusal to cooperate, the household can reapply. The household is not eligible until it cooperates with the Department.

(3-29-12)

#### **178. CATEGORICALLY ELIGIBLE HOUSEHOLDS.**

Households with all members meeting one (1) of the criteria below are categorically eligible for Food Stamps. The Department will not compute resource eligibility. The Department will not compute gross or net income eligibility. Categorically eligible households must meet all other Food Stamp eligibility criteria. Categorically eligible households have the same rights as other households.

(4-7-11)

**01. Cash Benefits.** All household members are approved for, or already receive, TAFI or AABD or SSI cash benefits. The household is categorically eligible.

(4-7-11)

**02. Benefits Recouped.** All household members have AABD or SSI benefits being recouped. The household is categorically eligible.

(7-1-98)

**03. Grant Less Than Ten Dollars.** All household members not receiving TAFI or AABD or SSI because their grant is less than ten dollars (\$10). The household is categorically eligible.

(4-7-11)

#### **179. HOUSEHOLDS NOT CATEGORICALLY ELIGIBLE.**

The households listed below are not categorically eligible for Food Stamps.

(4-7-11)

**01. Medicaid Only.** Households are not categorically eligible if any household member receives Medicaid benefits only.

(4-7-11)

**02. IPV.** Households are not categorically eligible, if any household member is disqualified for a Food Stamp Intentional Program Violation (IPV).

(6-1-94)

**03. Work Requirements.** Households are not categorically eligible, if any household member fails to comply with the Food Stamp work requirements.

(6-1-94)

**04. Ineligible Legal Non-Citizen or Student.** Households are not categorically eligible if any member is an ineligible legal non-citizen or ineligible student.

(7-1-98)

**05. Nonexempt Institution.** Households are not categorically eligible if any member is a person living in a nonexempt institution.

(6-1-94)

## KENTUCKY FOOD STAMP POLICIES

Kentucky had a policy from 2002-2004 (3 years)

Volume II  
Supplemental Nutrition Assistance Program

OMTL-[448](#)  
R. 10/1/13

MS 2370                      NONCOMPLIANCE WITH OTHER PROGRAMS                      (1)

- A. [When an individual fails to comply with requirements in some other programs they will be sanctioned in the Supplemental Nutrition Assistance Program (SNAP). This is to prevent an increase in SNAP benefits due to the decrease in the other program's benefits because of the non-compliance.

The following K-TAP disqualifications will generate a 310 spot check to the DCSR:

1. Failure to cooperate with DCS, resulting in a 25% reduction in the K-TAP benefit;
  2. Teen parent and no adult supervised setting;
  3. 444 - 16 to 18 year old not in school; and
  4. 416 - Cooperate with KWP. If the SNAP member is exempt work registration for any reason other than receipt of K-TAP benefits, then a 310 disqualification is imposed when the member fails to cooperate with KWP requirements and a 416 is generated by the KAMES system.
- B. When a 310 penalty is entered, the SNAP allotment will be reduced by 25%. Only one 25% reduction is applied to the case, regardless of the number of members with a 310 penalty. For K-TAP cases that are being penalized/sanctioned because the individual failed to comply with a program requirement, consider the reduced K-TAP amount in the SNAP income calculations and impose a 310 penalty. This policy only applies if the individual was certified for SNAP at the time the failure to perform the required action occurred.]

If there is a break in the household's SNAP participation, and a 310 penalty was imposed prior to the break, then the penalty would still apply at re-application if the non-cooperation with the K-TAP program is still occurring.

[A 310 disqualification does not apply when a disqualification is applied in a MA only case for not complying with MSE. See Vol IIA MS 4350 for additional information on disqualifications.]



## WISCONSIN FOOD STAMP POLICIES

Wisconsin had a policy from 2002-2010 (8 years)

**State of Wisconsin**

**Department of Health Services**

**FoodShare Wisconsin Handbook History**

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### **Policy history for 3.18.1 Child Support Cooperation**

#### **Release 06-04**

(Prior to Release 14-02, this section was previously listed as section 3.17.1.)

[3.17.1.1 Procedure for NCPs](#)

[3.17.1.2 Cooperation Criteria](#)

[3.17.1.3 Good Cause For Non-cooperation](#)

[3.17.1.4 Regaining Eligibility](#)

7 [CFR](#) 273.11(o)

As a condition of participation in the [FS](#) Program, require all [adult](#) FS applicants and recipients to cooperate with the State of Wisconsin [Child](#) Support Agency ( [CSA](#) ) if they are the biological or adoptive parent, or living with and exercising parental control over, a child under the age of 18 who has an absent parent.

Whether the person is cooperative or not is determined by the State of Wisconsin CSA and that information is communicated to the FS agency.



### **3.17.1.1 Procedure for NCPs**

If it becomes known at application, review or report of change that an applicant or recipient is a non-custodial parent, contact the CSA by telephone, e-mail, fax or other means of communication and ask for the person's cooperation status. The CSA will respond within seven days. The status of a FS applicant's cooperation as determined by another state is not used to determine FS eligibility in WI. Child support cooperation must be determined by the State of WI.

If a non-cooperative [NCP](#) becomes cooperative, it is the responsibility of the NCP to report the change to the FS worker and obtain verification. The CSA will provide verification to the NCP or the FS agency if requested by the NCP. Until verification is received, continue to consider the NCP to be non-cooperative.

### **3.17.1.2 Cooperation Criteria**

Deny eligibility to an adult FS applicant or recipient who fails to cooperate with the Child Support Agency without good cause under the following criteria:

1. A custodial parent, including a biological or adoptive parent, or any person living with and exercising parental control over, a child under the age of 18 with an absent parent, must cooperate with the CSA to:
  - a. Establish paternity,
  - b. Establish or enforce a support order, and
  - c. Obtain any other payments or property to which the child is entitled.
2. An alleged father of a child under the age of 18 must cooperate with the CSA to establish paternity.
3. A non-custodial mother of a child under the age of 18 must cooperate with the CSA to establish paternity.
4. Any non-custodial parent of a child under the age of 18 must cooperate, as determined by the CSA and DHFS, with the CSA to establish or enforce a support order for the child.
5. A parent who is/was court ordered to pay child support and is delinquent in making those payments will be denied FoodShare benefits regardless of the age of the child and regardless of whether there is a current support order unless:
  - a. The delinquency balance equals less than three months of the court ordered payment amount.
  - b. The court or county CSA is allowing the parent to delay child support payments.

- c. The parent is in compliance with a payment plan approved by the county CSA.

Assume the applicant is cooperating unless an alert or notice of non-cooperation is received from the CSA. If a notice of non-cooperation is received continue to code the person as non-cooperative until a notice and verification of cooperation is received by the CSA.

If the case was closed and the most recent status was non-cooperation when the person re-applies, continue to code the person as non-cooperative until notice of cooperation is received from the CSA.

If a parent or alleged parent is ineligible for the FS Program because of his or her non-cooperation with the CSA, deem that person's income and expenses to determine the FS group's calculation of eligibility.

### **3.17.1.3 Good Cause For Non-cooperation**

An individual who fails to cooperate with the CSA agency, can request a good cause waiver of their non-cooperation. The local agency decides whether to allow the waiver.

The following are good cause for non-cooperation:

1. It can be reasonably anticipated that the FS applicant/participant's cooperation will result in:
  - a. physical or emotional harm to the child and/or parent, including threats of child kidnapping or domestic abuse, or
  - b. making it more difficult for the parent or child to escape domestic abuse or risk of further abuse.
2. An adoption petition for the child(ren) in question has been filed with a court.
3. The child was conceived as a result of incest or sexual assault.
4. The parent is being assessed by a public or private social agency to determine whether his/her parental rights should be terminated.

If the denial of a good cause waiver is taken to a fair hearing in a joint FS and [W-2](#) case, the decision in the FS fair hearing shall supersede the fact finding decision in the W-2 case.

#### **3.17.1.3.1 Good Cause Notice**

A Good Cause Notice must be provided all clients at application and at any time a new child is added to the FS AG. This notice describes the right to refuse to cooperate with good cause in establishing paternity and securing medical support. Clients who wish to claim good cause must tell their worker. The worker will give them a Good Cause Claim form which explains how to claim good cause. Clients may also ask for the Good Cause Claim form to help them decide whether or not to claim good cause for not cooperating.

#### **3.17.1.4 Regaining Eligibility**

A person can regain eligibility for the FS program by cooperating with the CSA, including but not limited to, paying court-ordered child support payments as set out above.

*This page last updated in Release Number: 06-04*

*Release Date: 11/01/06*

*Effective Date: 11/01/06*

