



HB 1354 Testimony, Feeding Indiana's Hungry January 20, 2022

Feeding Indiana's Hungry represents 11 member food banks, all of which are Feeding America affiliates, that collectively serve all 92 counties.

I appreciate the intention of the author, to connect more Hoosiers to work, which is often what lifts families out of poverty. But we disagree that this is the way to do it. Child support compliance and mandatory SNAP Employment & Training participation are unproven, costly, and put families and children at risk.

One brief drafting problem, I know this is a model bill, it doesn't explicitly say FSSA has the ability to promulgate rules under this bill. Even with the carve outs in the federal codes cited I read this that FSSA wouldn't be able to implement things like the 'good faith' exemption under federal law.

The demand at our food banks and the more than 1,600 local pantries and other distribution sites has remains above pre-pandemic levels. Our food banks have been distributing upwards of 150 million pounds annually for the last two fiscal years. But for every one meal a Feeding America affiliate food bank distributes, the Supplemental Nutrition Assistance Program provides nine. SNAP benefits are all federal, the program administration is a 50/50 split.

Food assistance is a critical way to ensure children will have a healthy, nutritional diet. Rather than penalize parents, policymakers could strengthen SNAP by ensuring that it can help all who need it.

Good nutrition is foundational to children's health and learning. Children who receive SNAP have better health, do better at school, have better chances of graduating from high school, and are more likely to grow up healthy and self-sufficient. Taking away SNAP benefits puts children's physical and mental development at risk, with the harm lasting into adulthood.

Taking away food assistance like SNAP during a pandemic, when so many families are still struggling to feed their children, harms families and is damaging to the near- and long-term health and wellbeing of children.

Child Support Provisions

First and foremost, the overwhelming majority of children in poverty who are eligible for the Child Support program across the country already participate.

There are good reasons why it might not be in a family's best interest to pursue child support; forcing parents to do so may go against their wishes or could even put families in danger.

In domestic violence situations many may feel that they cannot trust the system to maintain their family's safety; SNAP eligibility workers do not have the information needed to make determinations about whether it is safe for someone to interact with child support officials. In other cases, grandparents who have taken informal custody of a grandchild might not want to implicate a parent struggling with a substance use disorder or mental illness in a child support enforcement action.



Some custodial parents have a child support agreement that isn't on file with DCS and would make them noncompliant under this legislation. Others chose not to engage in the child support program because their partner helps them in other ways. The requirement threatens to upset informal or out of court child support arrangements.

Moms and dads who don't have a reliable source of income often provide in-kind support instead, things like watching the kids while their partner goes to work, picking children up after school, or buying diapers and other necessities. If the legislation were passed, custodial parents could be forced to choose between food assistance and other kinds of parental support. Also keep in mind that a 'non-custodial parent' for the purposes of a child support order does not mean there would never be other children living in that household who would be impacted by such a loss of benefits.

Child support cooperation requirements punish parents who are experiencing poverty. To qualify for SNAP, a household of 4 must have a gross monthly income below \$2,871 (\$34,452 annually). SNAP is designed to help put food on the table and weather periods of economic hardship and financial instability. When non-custodial parents lose food assistance because they are unable meet the child support requirements, it puts them further behind and makes it harder for them to find stable financial footing. Cutting benefits without providing help finding a job will leave parents struggling to ensure their children have enough to eat. Some people simply cannot afford to make their child support payments. Further, implementing disqualification for non-payment would likely result in FSSA working to recoup overpayment after the fact, adding administrative burden and cost to the state and a financial repayment burden for families.

There is little evidence to suggest the policy would work. Very few states have implemented this 'State Option' provided by USDA because it is based on flawed presumptions about the ability of sanctions to change parental behavior. There's no evidence I have seen that they generate significantly more child support payments to custodial households; they put the food security of vulnerable people at risk, including children; implementation is very expensive and administratively complex; and non-punitive policies may be more effective at connecting more low-income individuals to child support services without risking compromising health and well-being.

The American Public Human Services Association (APHSA) and the National Child Support Enforcement Association (NCSEA), which represent state human services and child support administrators across the political spectrum, opposed the notion of a federal mandate in 2018 Farm Bill to require states to implement cooperation requirements for SNAP for these reasons.

Lack of supporting research caused Congress to mandate an assessment of this state option in the 2018 Farm Bill while rejecting required participation by all states. This ongoing study will look at overall costs of the policy, the impact on children, and alternative changes that do not involve taking food away from families.

The most recent State Options Report from the USDA from 2018 indicates only 8 states and Guam who participate in some form of punitive action for child support noncompliance.



Failure to cooperate—DQ for custodial parent: Florida, Guam, Idaho, Kansas (ONLY THIS DQ TO MY KNOWLEDGE, I am interested in seeing the data, this would be IV-D action and private court actions) Michigan, South Dakota (6)

Failure to cooperate—DQ for custodial & non-custodial parent: Virginia

Failure to cooperate—DQ for custodial parent & arrearage on support payments: Mississippi

Failure to cooperate—DQ for non-custodial parent & arrearage on support payments: Maine

In the places where similar requirements have been studied, they've yielded a negligible amount of extra income for families despite significant implementation costs to the state.

For example, North Carolina found the program a highly inefficient way of getting assistance to families. It cost \$2 million to implement, but only led to a total of about \$7,000 in child support payments to 12 families over the course of year, or only about \$50 a month.

- Similarly, Utah chose not to implement the policy after a [study](#) showed it would cost between \$3.2 and \$3.6 million. Researchers found that families would be sanctioned off food assistance and few would end up receiving additional funds from child support payments.

There are more cost-effective ways of getting assistance to children, including ensuring access to SNAP. Only a handful of states have opted to mandate child support cooperation over the past 20 years. Of those states, several quickly backtracked and abandoned it because there are better options for strengthening the Child Support program.

- States like Colorado, Georgia, and Washington have implemented non-punitive, supportive approaches that are focused on successful co-parenting and connecting non-custodial parents to employment services so they can meet their payments without putting kids' basic nutrition at risk.
- With federal funding support, states have also used digital outreach tools and marketing approaches to successfully boost engagement and interest in the Child Support Program without threatening the food security of families.

The bottom line: When parents lose food assistance because they do not meet the state's requirements, it reduces the family's overall food budget, leaving parents struggling to ensure that children have enough to eat.