



Date: May 7, 2018

The Honorable Michael Conaway  
Chairman  
Committee on Agriculture  
United States House of Representatives  
Washington DC 20515

The Honorable Collin C. Peterson  
Ranking Member  
Committee on Agriculture  
United States House of Representatives  
Washington DC 20515

Dear Chairman Conaway and Ranking Member Peterson,

We are the Mississippi Low Income Child Care Initiative (MLICCI), a statewide non-profit public policy advocacy organization working to improve women's economic security in Mississippi by making child care affordable for working moms, achieving gender equity in the workforce and making the safety net work for women.

We urge you to drop the provision in H.R. 2, the Agriculture and Nutrition Act of 2018, that would remove the state option to require custodial and non-custodial parents to cooperate with child support enforcement as a condition of eligibility for receiving Supplemental Nutrition Assistance Program (SNAP) benefits and instead make the requirement mandatory nationwide. Mississippi requires cooperation in a number of human services programs, including Child Care (CCDF), SNAP and TANF. And we have seen the policy negatively affect the lives of families and children we serve. In our work, we specifically see the affects in the context of child care.

### ***The History of Mandatory Child Support Cooperation in Mississippi***

Following federal welfare reform in 1996, the state of Mississippi implemented provisions of the newly created Temporary Assistance for Needy Families (TANF) state block grant and exercised several state options allowed by the new regulations. One of the new federal requirements was that mothers must assist the state in establishing paternity and initiating child support collections to be eligible for TANF.

States were given flexibility in how they designed and implemented that process and also how cooperation would affect a mother's eligibility for assistance. In 1997, Mississippi opted for the maximum allowable penalty under federal law, mandating that mothers applying for TANF must initiate child support collection in order to qualify for modest cash assistance. Failure to do so would mean the denial of assistance (See, [http://www.mdah.ms.gov/arrec/digital\\_archives/governmentrecords/files/legislature/peer-su/1997-rpt357.pdf](http://www.mdah.ms.gov/arrec/digital_archives/governmentrecords/files/legislature/peer-su/1997-rpt357.pdf)). Mississippi is also one of only six states to exercise its option to mandate child support cooperation for Supplemental Nutrition Assistance Program (SNAP) applicants.

In the early 2000s, Mississippi began imposing mandatory child support cooperation in other assistance programs where the state had the flexibility to do so, even though such programs were not designed to incorporate a child support requirement.

Mississippi has required all single parents applying for child care assistance funded through the Child Care and Development Fund (CCDF), another state block grant, to initiate a child support case against the absent parent through the Mississippi Department of Human Services (MDHS) since 2004. While a portion of recipients served through CCDF funds are TANF recipients, the CCDF program is designed to serve a much wider range of low-income working parents who may not be eligible for TANF, but who are eligible for child care assistance as a work support. No basis for the child support requirement in the state's CCDF program existed in federal law.

### ***Mandatory Child Support Cooperation in Mississippi has hurt families and children***

This child support requirement has had a devastating effect on families – mostly single mom headed families. When it was imposed, the child support requirement discouraged many eligible mothers from applying for the child care assistance and other forms of assistance they need. Some single mothers opted not to pursue child support due to fear of violence from the absent father and others found that informal arrangements resulted in more from the absent father on a more immediate and regular basis than would be the case if they sought child support through MDHS.

When this requirement went into effect in the CCDF program in 2004, MDHS reported that the waiting list for child care certificates fell from over 10,000 to 200 in less than two months. A survey of 144 child care centers conducted by the MLICCI showed that 1,284 children lost their child care certificates because of this requirement. After implementation of this requirement, approximately 40% fewer children were served in the child care centers we surveyed than were served prior to this rule change.

Fourteen years later, it continues to have a negative impact. We (MLICCI) hear from parents who opt out or lose their child care. These are low-income single mothers who need child care in order to work or attend education and training. In addition, we hear from child care providers who have lost child care certificates in such numbers that they were forced to close down their businesses. This means the requirement is not only compromising the well-being of parents and children, but is also having a lasting negative impact on local jobs and affordable child care options for parents who are working or participating in job training or education.

At a 2016 statewide child care meeting, MLICCI surveyed 162 providers and 91% said the state's child support requirement in CCDF keeps eligible parents they serve from applying (See, <http://www.mschildcare.org/wp-content/uploads/2017/03/provider-input-on-CCDF.pdf>). What's more, neither Head Start nor public Pre-K in Mississippi has a child support requirement.

New CCDF rules make clear that a primary program goal is to increase the share of eligible parents and children participating in the state certificate program. New rules also make clear that aligning early childhood programs is key to improving the delivery and continuity of services for low-income families.

The child support requirement contributes to the gap in people served vs. eligible and is particularly harmful to African-American single mothers. More than 90% of mothers and children served by both CCDF and TANF in Mississippi are African American. Mississippi serves only 12% of children eligible for CCDF and TANF reaches only 10% of families below poverty. The recent U.S. Commission on Civil Rights Mississippi State Advisory Committee report found that "...because the majority of single parents are women, this policy necessarily results in a disparate impact on the basis of sex." Additionally, Mississippi is a national outlier in its rate of applicants who are denied TANF assistance (See, <https://thinkprogress.org/mississippi-reject-welfare-applicants-57701ca3fb13/>).

Mississippi's child support policy across multiple public assistance programs, along with other punitive requirements that undermine the complexity of individual circumstances, has eroded the reach of Mississippi's basic safety net over time. Adding this requirement to the SNAP program at the national level would similarly weaken the safety net for very vulnerable individuals across the country.

Everyone agrees parents should support their children, but the policy to make this happen shouldn't punish children and their single moms. Research shows that single parents benefit most from affordable child care, yet these are the parents most adversely impacted by the child support requirement. The child support requirement is an impediment to children getting the early childhood they need and to moms getting the financial support and affordable child care

services they need to work or to participate in job training or education that will place them on a pathway to greater economic security.

Similarly, evidence suggests that SNAP is effective. It reduces food insecurity, alleviates poverty, and improves health and educational attainment over the longer term. A national child support cooperation requirement in SNAP would stand in the way of low-income parents and children getting the nutrition they need, as it has stood in the way of Mississippi's low income working moms in getting the child care they need to work and in the way of their children getting the early learning they need.

Please consider the negative impact of the child support requirement in Mississippi before removing state flexibility and mandating this policy nationwide. We urge you to eliminate this requirement in all federal safety net programs and specifically to avoid mandating cooperation with this requirement on mothers who are trying to stabilize their families through participation in SNAP.

Sincerely,

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CC:

The Honorable Pat Roberts  
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