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Ohio Senate  
Government Oversight Committee  
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Interested Party Testimony on Senate Bill 240  
Amy Roehrenbeck, Esq., Executive Director  
Ohio Child Support Professionals Association

Madam Chair Roegner, Vice Chair Antani, Ranking Member Hicks-Hudson, and members of the Committee, thank you for the opportunity to provide Interested Party testimony on SB240. My name is Amy Roehrenbeck, and I am the Executive Director for the Ohio Child Support Professionals Association (OCSPA, formerly OCDA), a membership organization of county child support enforcement agencies (CSEAs), dedicated to strengthening Ohio's child support program by providing advocacy, training, and development for all child support professionals in Ohio.

OCSPA and its member counties have a great interest in the non-custodial parent child support cooperation requirement included in SB240 and wish to provide information and insight on the application of such a requirement in Ohio.

Earlier this month, the results of a multi-year study on cooperation requirements were published. This study was commissioned by Congress in 2018 as part of the Farm Bill, instructing the U.S. Department of Agriculture's Food and Nutrition Service (FNS) to conduct an independent evaluation of child support cooperation requirements in the Supplemental Nutrition Assistance Program (SNAP). The full study can be found here: [SNAP – State Policy Options Related to Custodial and Non-Custodial Parent Cooperation with State CSAs | Food and Nutrition Service \(usda.gov\)](https://www.usda.gov/food-nutrition-service/state-policy-options-related-to-custodial-and-non-custodial-parent-cooperation-with-state-csas).

The study used in-depth qualitative and quantitative data collection in eight states. Five of the nine states with present cooperation requirements participated, as did three states that had proposed legislation at the time—one of which was Ohio.

The findings of this extensive study suggest that a range of policy environments and other conditions make it difficult to support cost-effective implementation of cooperation requirements, and that it would be challenging to improve family economic security by requiring cooperation with child support. The study offered key considerations for implementing cooperation requirements that I would like to take a moment to address.

1. Automated interfacing data systems are key but require substantial cost for states that do not already have them in place.

To implement the cooperation requirement in SB240 would require coordination between two statewide data systems, the Ohio Benefits system (OB) for the SNAP side of the requirement, and the Support Enforcement Tracking System (SETS) for the child support side. This would be a complex undertaking. While these systems have some automation, in order to implement this bill, it would require processes that are not presently in place regarding the status of non-custodial parents. These processes would have to come in at a time when we are working to modernize the child support statewide system. SETS is over 25 years old and runs as a COBOL mainframe system. We are in the middle of a multi-year modernization project and any additional requirements made of the system at this time could set us behind even further.

There are significant cost implications that need to be considered to develop, maintain, and upgrade existing interfaces. This includes the need to align policies and procedures for referral, intake, and ongoing case monitoring across these programs. Because SETS is aging, there is not an easy bridge to build to OB to interface and provide the data necessary to address the requirements of this bill. If the automated systems are not updated and integrated, counties would have to rely on manual processes which would slow down the referrals, reporting, and collection of support.

SB240 provides no funding to address the IT infrastructure needed to effectuate the requirements of the bill. This investment must be there to ensure that these systems are automated for better and timely case administration at the county level.

2. Ongoing implementation of the cooperation requirement creates administrative complexity and costs, particularly for child support staff.

Child support agencies in Ohio serve nearly one million children. We are a state-supervised, county administered program, which means that local agencies at the county level provide the service delivery. Many counties are currently understaffed, with large caseloads per worker. Based on estimates, we could see an influx of up to 150,000 new child support cases in our caseloads, at a time when many agencies have long-term staff vacancies and growing numbers of staff retirement and attrition. Counties would have to consider creating hundreds of new positions or attempting to repurpose current positions to handle this influx, while many are having challenges even finding qualified applicants and/or paying a competitive wage to secure and retain new hires.

As noted above, there is no present requirement for a non-custodial parent to cooperate as a condition of eligibility for benefits (OWF, Medicaid, or SNAP). We have no present mechanism to track their cooperation, so this would all need to be built within our system. In addition, staff on both the child support and SNAP sides would have to develop and coordinate new policies and procedures, train staff, and monitor the implementation of this new requirement. Cooperation status could vary from week to week as a parent changes jobs, has medical issues, transportation challenges, and the like, leading to cumbersome reporting and tracking of cooperation.

3. The cooperation requirement may lower SNAP benefits costs for the federal government, but savings may be offset by increased costs to the child support program.

As noted above, case management is done at the county level for both SNAP and child support. Any review for compliance with a cooperation requirement would be on a case-by-case basis. While estimates in the report indicate potential for cost savings in SNAP benefits, it is all at the federal level. Counties would need to hire additional staff, invest in training on the requirements, update policies and procedures, and review each case individually.

4. Implementation of the cooperation requirement did not result in increased child support payments to SNAP households, on average.

Child support agencies have a range of enforcement tools available to address nonpayment of support for those that are able but unwilling to pay. Our enforcement tools are effective in collecting child support and Ohio currently performs very well nationwide, ranking fourth overall in dollars collected for families. Our collection techniques, however, do not include the sanctioning of food assistance benefits.

We have made several significant changes over the past six years to address child support orders for low-income payors, including updates to the economic tables used to set orders. Child support in Ohio is based on an income shares model, and when both parents are in deep poverty, the resulting order can be quite low, as there is only so much money available to be exchanged for support. Mandating cooperation does not mean that barriers are automatically removed for payment.

5. The financial stability of parents sanctioned for noncooperation with the requirement may worsen and getting back into compliance can be challenging.

It may be more advantageous to strengthen the relationship between workforce and child support rather than SNAP and child support. In fact, the Federal Office of Child Support Services released a grant forecast on NextGen Employment Services for non-custodial parents, as well as a notice of proposed rulemaking to allow for states to draw down federal funds to support employment services, job training, job skills, and other related activities to assist non-custodial parents in obtaining and maintaining employment.

6. States are not adequately implementing good cause exemptions which are intended to protect parents from domestic violence.

Our program has a focus on delivering safe services to survivors of domestic violence, and any new requirements should be vetted through a trauma-informed lens.

The SNAP report concluded that cooperation requirements do not lead to cost savings for states and local agencies, do not lead to increases in child support paid, and lead to food instability in households that may also have minor children. We respectfully request that in-depth discussion happen with all necessary stakeholders on the expectations of a change like this in Ohio, and we will be meeting with the sponsor to discuss this further in a few weeks.

Thank you for the opportunity to provide testimony on this bill. I am happy to answer any questions.