



Written Testimony for the Public Assistance Benefits Accountability Task Force
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Chairman Schaffer, Chairman Wiggam and members of the Public Assistance Benefits Accountability Task Force, we appreciate the opportunity to share testimony today. My name is Tara Britton and I am the Director of Public Policy and Advocacy at The Center for Community Solutions. I am joined by my colleague, Rachel Cahill, Visiting Fellow, Public Benefits, at Community Solutions in submitting this written testimony. The Center for Community Solutions is a nonprofit, nonpartisan think tank that aims to improve health, social and economic conditions through research, policy analysis and communication.

We want to begin by sharing a resource produced by Community Solutions that will center the needs of each legislative district as the task force considers its recommendations. Every two years, Community Solutions produces legislative district fact sheets. To the best of our knowledge, the fact sheets released in March, 2023, are the only resource available that includes data specific to the new legislative districts. There are fact sheets for each state House and Senate district. They are available here: <https://www.communitysolutions.com/resources/community-fact-sheets/ohio-legislative-districts/>. We mention these fact sheets to highlight how critical public benefits are to every district in the state of Ohio. There are citizens connected to these programs to access health care, food and shelter in every district and any changes proposed should focus on the people who will be impacted.

This task force has examined many aspects of public benefit programs in Ohio over the last nearly two years of presentations and testimony. We think it is vital to keep in mind the goals of public benefits programs, which are to provide health care, nutrition and support primarily to families with children, older adults and people who are disabled. We all aim to ensure the programs are working most effectively and efficiently and there are ways to make improvements, some of which have been discussed by this task force and the invited testimony. We believe the focus should remain on ensuring Ohio families who are eligible for public benefit programs are able to access them.

We want to do all that we can to support our county partners. Counties are the access point for many of these programs and have a huge job at hand to ensure that they are adhering to all federal and state guidelines for the programs that they administer. Counties are already stretched thin, resulting in long wait times when people call in to report changes, complete mandatory interviews, or have questions about using their benefits. This task force should closely examine the recommendations made to improve contact with county offices and reduce administrative burdens on all sides.

While the task force has learned about many different topics pertaining to public benefits since 2021, we want to offer additional research and data on a few areas that task force members have raised.

Child Support Cooperation

During the March 28, 2023 task force meeting, task force members suggested that SNAP benefits should be contingent on parent participation in Ohio's Child Support program.



- Child support cooperation is already high in Ohio
 - o Ohio ranks 4th in the nation for child support cooperation. 70% of child support is collected timely. As noted in the presentation by the Ohio Child Support Enforcement Agency (CSEA) Directors Association, non-payment from parents whose incomes are low enough to qualify for SNAP is about parents who are unable, not unwilling, to pay.
- Custodial parents not participating formally in child support have good reasons.
 - o A Texas study shows more than 4 in 10 non-participating mothers are victims of domestic violence.
 - o Some families have informal arrangements that are working well for the child, and inserting court dynamics risks destabilizing co-parenting arrangements, potentially increasing animosity and the risk of violence.
- Mandatory child support cooperation always hurts children.
 - o When custodial or non-custodial parents have SNAP benefits sanctioned due to non-cooperation with child support, food is removed from a very low-income household. Decades of research tell us that this leads to food rationing among family members and increased child hunger.
 - o As Ohio CSEA Directors Association testified, the process for claiming good cause exemptions is complex and families in the current system already fall through the cracks. Adding over 100,000 new families to the child support system and associated courts is very likely to overwhelm the system and make timely and appropriate risk assessments for families impossible.
 - o Many caregivers are grandparents or other relatives, so it is unclear how new restrictions would be enforced. For example, would a grandmother caring for her grandchild be sanctioned off SNAP for not pursuing a formal child support order against her own child who is experiencing mental health challenges?
 - o As mentioned by Hancock County JFS Director Galbraith, taking food resources away from very poor families who are already in crisis could ultimately result in the need for child welfare to get involved. Child welfare cases are vastly more expensive for counties, and the State of Ohio, to manage compared to the very modest benefit that SNAP provides with 100% federal funds.

Technology & System Improvements Needed

As detailed in thorough presentations before the task force by the Ohio JFS Directors Association and individual county JFS Directors, the technology systems used to manage Ohio's public assistance programs need significant improvements to perform at the level that Ohio's legislators and residents expect and deserve. Key areas of scrutiny and investment that the legislature should consider, include:

- **Excessive alerts:** As detailed by Lorain County JFS during the November 15, 2022 task force meeting, millions of duplicative and outdated alerts are bogging down the Ohio Benefits Worker Portal. Legislators should not invest in additional data matching proposed by third-party vendors until the existing technology is vastly improved.
- **Automated notices:** As detailed by the Ohio JFS Directors Association on multiple occasions, the number and complexity of written notices received by public assistance recipients results in a high volume of calls to county JFS agencies and significant processing delays. Legislators should encourage the Ohio Department of Job and Family Services to speed up their current notice



redesign project to deploy new and improved notice designs for SNAP and Medicaid as soon as possible, but no later than the end of 2023.

- **Ohio Benefits Self-Service Portal:** Despite some modest improvements in 2022, Ohio's client portal is outdated and underutilized, and falls far behind the performance of other states that emphasize self-service options to increase caseworker efficiency. In November 2020, The Center for Community Solutions [published a report and recommendations](#) that are still relevant today. We encourage the legislature to support the human-centered re-design effort for the Ohio Benefits Self-Service Portal that was announced by ODJFS Director Damschroder at the March 2023 task force meeting.
- **Ohio's mail-only EBT card issuance system:** One technology short-fall that did not receive sufficient attention during task force meetings was Ohio's contract with the EBT vendor Conduent only issues new or replacement EBT cards to eligible households by mail. Community Solutions has written about the weaknesses of this system and recommendations for improvement on several occasions (see [here](#) and [here](#)) in order to bring Ohio into compliance with federal regulations.
- One predictable outcome of this mail-only system is that some eligible recipients never receive their EBT card or have trouble getting a replacement card, since cards cannot be issued by local JFS offices. In a few cases, this leads to high unused balances on EBT cards, especially for elderly and disabled recipients who have trouble navigating a complex phone tree to activate their EBT cards.
 - o Despite suggestions made in the press that SNAP recipients with high balances do not "need" the benefits (remember, they would not qualify if their incomes weren't low-enough to need help buying food), these individuals need proactive outreach to find out what happened to their card. After nine months of inactivity, unused SNAP benefits are automatically "expunged" and returned to the federal treasury, since they are 100% federal funds. Rather than assuming that SNAP recipients are using unspent funds as a "savings account", legislators should instruct ODJFS to proactively contact every individual with a high balance and offer them assistance using their card before benefits are permanently expunged.
- Any funds that are clawed back or "expunged" (as SNAP refers to it) are federal dollars. They aren't utilized in other ways for program beneficiaries and the state does not have flexibility to spend them.

Conclusion

Community Solutions aims to ensure that the safety net of public benefits programs is effective, efficient, equitable and responsive, goals that we should all agree upon. In this task force, we have heard about the challenges that the public benefits system faces and ideas about ways to improve it. We stand ready to assist the task force members as you develop the recommendations. Thank you for your time.

Please contact us with any follow up questions.

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