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From Policy to Practice: How States Limit Driver's License Suspension for Low-Income Noncustodial Parents

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Background

Child support orders establish a regular payment obligation for parents who live away from their children (often referred to as "noncustodial parents" (NCPs)). When those payments go unpaid and child support debt accrues, state child support programs have an extensive enforcement toolkit at their disposal. Driver's license suspension—an enforcement tool that is federally mandated but applied at state discretion[1] — is among the most frequently discussed. Intended to motivate parents who have the means to pay to do so, it is viewed as effective in changing payment behavior. For example, early research found that driver's license suspension notices generated greater increases in child support payments than credit bureau reporting alone, with an average increase of approximately $109 per case per year (equivalent to $224 in 2026).[2] More recent research found that notices of intent to suspend and actual driver's license suspension were associated with beginning to pay child support, but only in the same month they occur and with a weaker effect than other enforcement tools.[3] Prior earnings and employment history are among the strongest predictors of whether an NCP begins to pay, suggesting that the parents most motivated to respond to driver's license suspension are those who already have the means to do so.[3]

For parents without the means to pay — estimated between 30 and 40 percent of the NCP population nationally[4,5] — driver's license suspension reduces the ability to gain and maintain work, undermining the more stable employment that would increase the likelihood of future payment.[6,7] In fact, among a range of NCP employment and economic barriers studied (e.g., criminal record, housing instability, transportation, physical health), transportation was identified as one of the strongest predictors of employment and earnings, and the *only* barrier significantly associated with the likelihood of paying child support and average payment amount.[8] This association is particularly acute in rural areas, where driving is often the only viable option for transportation.[6,7]

The following brief outlines how six states approach the challenge of identifying the populations for whom driver's license suspension is least likely to be effective (and limiting its use for those parents), how they implemented new policies to make that determination more deliberately, and what they have learned along the way.

State Approaches to Limiting Driver's License Suspension for Low-Income NCPs

Scope

In early 2026, the Center for Policy Research (CPR) administered a survey to all 50 state and the District of Columbia child support directors with the goal of learning about the policies and practices state child support programs have to support low-income NCPs. Of the 32 responses, six states — California, Illinois, Maryland, Minnesota, Washington, and Wisconsin — reported that they have statewide policies to waive driver's license suspension as an enforcement practice for NCPs with low income or other indicators of inability to pay, such as receipt of means-tested benefits. CPR conducted follow-up interviews with child support leaders[a] in each of these states to learn how these driver's license suspension exemption policies were adopted and implemented, how they work in practice, and what lessons emerged. Although other states, such as North Dakota and Louisiana, have built meaningful safeguards into their suspension processes (e.g., case manager review, payment plan options, and employment referrals),[9] this brief focuses specifically on states that formally determine which NCPs are exempt from driver's license suspension based on actual income or criteria that suggest low-income status (e.g., receipt of means-tested benefits).

Why States Acted: A Shared Philosophy

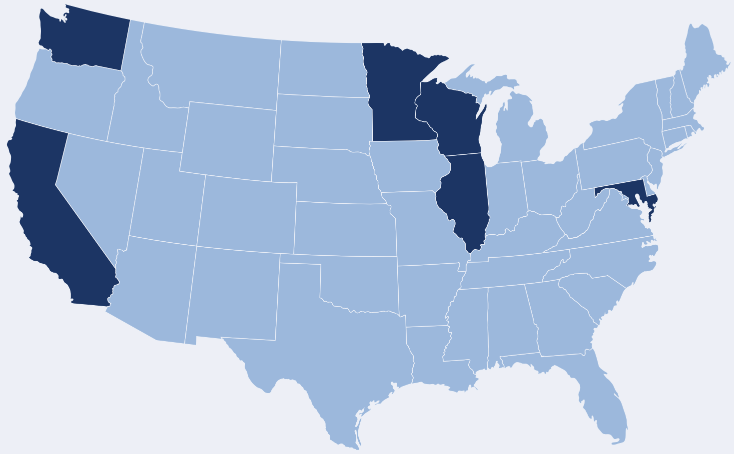
The six states we focus on make a fundamental shift, using enforcement as a deliberate approach after barriers to payment have been assessed, rather than an automated response to nonpayment. As Washington's Monica Turnbaugh put it, enforcement is "a remedial tool to encourage payment, not a punishment." Indiscriminate enforcement may produce sporadic responses, but targeted engagement produces more consistent results. In her words, "Hit them high [with indiscriminate enforcement] makes people run and hide. So we might be able to hit them high three times in a year, but wouldn't it just be better to get 12 months of regular consistent payments?" Phrased somewhat differently, Colorado's Larry Desbien notes that, "All of the heavy-handed enforced remedies in the world are not going to magically give someone the ability to pay support if they don't have the resources to do it."

Driver's license suspension emerged as a natural starting point for enforcement reform. As one of the most frequently used enforcement tools, it had generated a body of evidence that made the case for a closer look. Pilot data from Minnesota found that roughly half of cases selected for suspension involved parents who did not have a valid license to suspend.[10] Administrative data from Wisconsin revealed disproportionate impacts on low-income NCPs and communities of color.[11] Community feedback across multiple states echoed the same concerns. Pre-reform operational data from one California county showed that 85% of parents with suspended licenses fell below 70% of the area's median income; only 6% of the annual customer inquiries about license suspension resulted in collection, and the estimated annual staffing cost of administering that driver's license suspension program exceeded $381,000.[9]

a See Appendix A for the full list of interviewees, which includes representatives from additional states.

Six Unique Approaches to Limiting Driver's License Suspension

The shared philosophy that these states have adopted belies underlying differences in their policies to use driver's license suspension and identify parents who have the means to respond.



Washington has the simplest, and notably, oldest approach. When Washington enacted its license suspension program in 1997, Temporary Assistance for Needy Families (TANF) recipients were exempt from the start. Over time, the exemption expanded to include recipients of other needs-based programs and parents with circumstances that serve as proxies for low income or inability to pay: Housing and Essential Needs, Aged, Blind, or Disabled assistance, Social Security Income, and incarceration or placement in a facility. This was never a reform so much as an established practice that has evolved as the programs covered by the exemption have changed. Washington's rationale for categorical exemptions over an income-based approach is practical: categorical exemptions use existing program eligibility determinations as a proxy for low income, whereas income thresholds require the agency to prove an NCP's income before acting.

California's SB 1055,[12] sponsored by the Western Center for Law and Poverty, became effective January 1, 2025 and takes a clean income-based approach: driver's license suspension (which is typically triggered by being in arrears for at least six months) is prohibited for NCPs whose income is at or below 70% of the area median income (AMI)[b] for the county in which the NCP resides. The process reversed the traditional driver's license suspension workflow: rather than placing all parents in arrears on a list for the DMV, caseworkers now verify income first and submit only parents whose income exceeds the 70% AMI threshold for suspension. On the effective date, California released all child support-related driver's license suspensions statewide and rebuilt the process from scratch. This allowed the agency and DMV to implement the new income verification workflow cleanly, without having to assess existing suspensions individually against the new standard. In the first year of implementation of SB 1055, driver's license suspensions decreased by 85% statewide.

Minnesota's approach is discretion-based rather than categorical or income-based, a significant departure from the state's previous automated process. A 2023 statutory change[13] added 11 discretionary factors that workers must consider before proceeding with suspension, covering circumstances like receipt of public assistance, substantial intent to comply, job transitions, income withholding recently sent, and safety concerns including domestic violence. Workers who do not pursue suspension must select a coded reason in the system, creating a data trail that documents why cases are not moving forward. In the ten months following the 2023 changes, Minnesota saw a 33% decrease in suspensions. Court hearings and payment plans entered to avoid suspension have also declined because fewer cases are reaching the stage where those responses would be needed.

b AMI is published annually by the California Department of Housing and Community Development.

Effective January 1, 2026, two automatic criteria were added: license suspension will not be initiated if the NCP does not have a valid license on file or if there is no known address. The valid-license criterion came directly from pilot findings that approximately 50% of cases selected for suspension did not have a valid license at the time.[9] The no-known-address criterion reflects a similar recognition that suspension notices cannot reach parents if they lack an address.

Illinois's approach, which is set in internal policy, determines eligibility in two stages. Its system automatically screens out NCPs receiving TANF, Supplemental Nutrition Assistance Program (SNAP) benefits, or unemployment insurance, therefore removing many low-income NCPs from the enforcement pool without caseworker judgment. For those who fall outside those categorical screens and are flagged as potentially eligible for enforcement, the system sends a notice of intent to suspend. At that point, the burden shifts to the NCP. If the NCP responds to the notice and contacts the agency, workers conduct individual follow-up to understand barriers to payment. If the NCP does not respond, suspension proceeds.

Wisconsin's approach, implemented through internal policy[14] in February 2025, begins with an automated screening in the state's child support system. Driver's license suspension may not be pursued unless the payer's debt equals or exceeds 300% of the monthly order amount — and even then, only if current employment is documented in the system, along with income or attachable assets. If no current employment or income is documented, suspension cannot proceed until the worker manually verifies. Before triggering a formal notice, workers must attempt contact by at least two methods and must make the NCP aware of numerous options and opportunities. By December 2025 (10 months after policy change), suspensions dropped from approximately 300–350 per month to roughly 50 per month.

Maryland's state legislature passed House Bill (HB) 681[15] in April 2025. The law took effect October 1, 2025 and made two significant changes to the state's driver's license suspension program. First, it raised the minimum period of noncompliance before a parent can be referred for suspension from 60 to 120 days. Second, it exempted NCPs at or below 250% of the federal poverty guidelines from the driver's license suspension program, unless they're determined by a judge to be voluntarily impoverished (meaning the NCP had deliberately reduced income to avoid paying support). In order to implement this new state law, the Maryland Child Support Administration updated its data system to be able to track those voluntarily impoverished at the time of child support order establishment, and also to automatically calculate an NCP's poverty level from their household size and current income, when the information is available to the agency. However, prior to the statutory change, the data system did not have fields for voluntary impoverishment or NCP household size. The data system also did not previously track an NCP's income or how current that income was. Without the necessary data to calculate an NCP's poverty level, license suspension cannot occur, which has greatly reduced the number of license suspensions. Jenna Janocha attributed the reduction to the lack of income and household size data, which prevents the system from automatically determining poverty level and therefore identifying NCPs above 250% poverty level who are eligible to be referred for license suspension, as well as a genuine reduction in the number of NCPs eligible for suspension under the new threshold.

Implementation Challenges

Determining Who Lacks Adequate Means to Respond

Determining which NCPs lack the means to respond to driver's license suspension is harder than it sounds. The staffing resources required to make case-by-case determinations are substantial, and the automated systems designed to ease that burden are often incomplete. States have structured their policies to manage that tension in different ways. In states with categorical or status-based exemptions (Illinois, Washington), other programs do the sorting. Existing eligibility determinations for TANF, SNAP, and similar means-tested programs serve as a proxy for low income, and the caseworker burden is minimal. Both Illinois and Washington explicitly chose categorical exemptions over an income-based approach to avoid this burden — income thresholds would require the agency to affirmatively prove the parent's income exceeds the limit before acting. Illinois adds a second stage where the NCP bears the burden of responding to a notice and engaging with the agency; again, further reducing the burden on the program. As Illinois's Bryan Tribble put it, "That's something we've worked hard to build in. We have to."

For states where eligibility is neither categorical nor fully automated (California, Maryland, Wisconsin, Minnesota), the determination falls on the child support program. Because many child support programs' automated data systems lack complete income and asset information, that burden frequently carries over to individual workers. For example, Maryland's law ties its exemption to the federal poverty level, which requires current data for both NCP income and household size. Neither of these were tracked prior to the passage of HB681 (2025), so the data system does not have this data for most NCPs at this time. When this information is missing, the data system alerts the worker to verify income and/or household size manually in order to determine if the driver's license suspension process can move forward. The same challenge exists in California, as county AMI is tied to both income and household size. The AMI threshold is published annually by county but is not automated in the child support system — caseworkers must apply the current threshold manually when verifying income. And because wage data from the Employment Development Department and other interfaces typically lags by six months, California requires local child support agencies to contact the NCP directly to verify current income before any suspension can proceed. Without that verification, the NCP cannot be submitted for suspension. Although Wisconsin's policy does not rely on household size, their wage data (like other states) is typically lagged six months, meaning that caseworkers must manually verify current income before any suspension can proceed. In Minnesota, workers must consider 11 discretionary factors — each of which are related to NCPs' ability to pay — before proceeding with suspension. This is a substantial ask in a system with high case volume and worker turnover. In all four states, the burden on workers is real, resource-intensive, and difficult to ensure is being applied consistently across cases and counties.

Finally, income-based exemptions that rely on discrete income records may over-exempt parents, not necessarily because they lack the means to respond, but because their income is simply not captured by the data system. Gig, 1099, and freelance income is often invisible to quarterly wage data and similar data sources.

County Administration

The single most consequential structural factor in whether enforcement reform can be implemented uniformly is whether a state's child support program is state-administered or county-administered. State-administered programs (Illinois, Maryland, Washington) can set uniform policy that applies across the entire caseload. County-administered programs (California, Minnesota, Wisconsin), face a fundamentally different challenge. In county-administered states, the state can encourage enforcement flexibility and issue policy guidance, but uniform implementation is harder to mandate, and practices vary across counties depending on local court culture and caseworker discretion.

Culture Change

Program leadership consistently described resistance from workers accustomed to the traditional model of enforcement. In several states, leaders described internal resistance rooted in an "assistance recovery mindset," or the view that if the state gives a family public assistance, it should recover an equal amount in child support.

A related challenge is inconsistency. Whether workers are manually tracking down missing income data (Wisconsin, Maryland, California) or exercising judgment across 11 discretionary factors (Minnesota), there is no reliable way to ensure these steps are being completed consistently across cases, workers, and counties — particularly in systems with high case volume and worker turnover. Even in state-administered programs with clear procedures, the volume and complexity of individual cases creates natural variation in how policies are applied.

Lessons Learned

Design with Everyone at the Table

Reforms that emerge from inclusive design processes tend to fare better in implementation than those handed down from above. Minnesota ran a pilot program in 12 counties before designing the 2023 statutory changes, with pilot counties participating directly in the work group that designed the statute. That sequencing meant the policy was built on empirical findings rather than assumptions. The valid-license criterion, for example, came directly from the pilot finding that approximately 50% of cases selected for suspension did not have a valid license at the time.[10] Wisconsin similarly involved county partners in developing its administrative code changes. In both states, early participation meant that workers, line staff, and county partners understood the rationale before the policy went live, reducing the sense of being blindsided that can fuel resistance. California's experience offers a different but instructive model. Although SB 1055 was sponsored by the Western Center for Law and Poverty rather than the child support agency, California's legislative process requires the agency to review the bill and provide a formal impact assessment, which gave DCSS the opportunity to weigh in on what would and would not work in practice before the law was finalized.

Design to Reduce Agency Burden

To avoid inconsistency and worker burden, build in and use automation to verify income information. Where automation is not possible, states have taken two different approaches to managing the burden. Illinois's approach is for the NCP to bring forward documentation to claim the exemption. In comparison, Maryland's law requires the agency to determine whether or not an NCP qualifies for the exemption prior to making a referral for license suspension. Minnesota's Melissa Froehle suggests reducing the burden on the agency through two strategies: first, narrow the pool of cases workers have to review so that judgment is only required where it's genuinely needed, and second, invest in training that reframes client engagement as more efficient. During Minnesota's driver's license suspension pilot, workers using a structured engagement script were able to identify new employers and set up income withholding on the spot, which produced better outcomes than waiting for the automated new hire and income withholding process to run its course.

Before finalizing any policy design, confirm that your data systems can support what the policy requires. If the system can't make the determination automatically, either revise the policy or connect directly with the systems team early enough to close the gap.

Finally, where worker discretion is unavoidable, build in fidelity markers from the start. Minnesota's coded reason system creates a data trail that allows the agency to examine patterns over time. Without this kind of accountability structure, it is difficult to know whether the policy is being applied consistently.

Train, Listen, Clarify

Reforming driver's license suspension policy requires workers who understand why the change matters and how to apply it. Staff training should directly acknowledge the significant burden these policies place on workers and make the case for why it's worth it. Workers need to understand not just what the new policy requires, but also why the old approach wasn't working and how engagement-focused practices can produce better outcomes over time.

Minnesota's experience offers a concrete model for how to approach this. During their driver's license suspension pilot, the agency developed a full worker engagement script to guide staff through calls with NCPs that emphasized the efficiency of this approach for workers. Then, ahead of 2023 statutory changes, the agency expanded their training by developing more materials and issuing follow-up guidance when questions from those trainings emerged.

It's also worth recognizing that cultural change of this magnitude will not happen overnight. According to Wisconsin's Phyllis Fuller, it took approximately 10-15 years to obtain full acceptance of a similarly significant reform to suspend child support orders during incarceration. Investing early in leadership alignment and broad buy-in before a policy goes live can meaningfully shorten that timeline.

Build Evaluation Capacity from the Start

State child support systems are built for case processing, not program evaluation. As a result, the outcomes of driver's license suspension reform are difficult to measure even in states that have invested significantly in policy change. The lesson is not simply that more research is needed, but that evaluation capacity has to be built into the program alongside policy implementation. Adding a new data field, like Minnesota's 11 coded reasons for not pursuing suspension, is a small lift at the design stage that becomes a significant asset later. States that wait until after implementation to think about evaluation will find themselves unable to answer the basic question of whether and how their policy supports low-income NCPs and its impact on payment.

Codify Your Policy Deliberately

Codifying new policy in internal policy, administrative code, or statute carries different tradeoffs. Internal policy (Illinois, Wisconsin) is the fastest to implement but offers no protection against reversal when leadership changes. Illinois's Bryan Tribble, whose low-income enforcement exemptions are set in internal policy, described the challenge: "We can make all of these wonderful changes… but that can easily be undone if we don't enshrine those somewhere." Administrative code (Washington) provides a layer of procedural protection. Statute (California, Maryland, Minnesota) is the most durable and offers workers the clearest legal authority, but it may not be achievable in every political context. Additionally, as statute is durable, it is important to ensure the language of the law considers implementation. Consider the "family of one" problem in Maryland and California. Household size is required to calculate the federal poverty guidelines (Maryland) and area median income (California). Without the statute explicitly stating that agencies must use a "family of one" for driver's license program eligibility calculations, agencies must instead try to identify each NCP's specific household size to determine whether their income falls below the threshold. In the current policy environment, the calculus is particularly acute. States that can move toward statute should; but a reform implemented through internal policy today is better than one waiting for a legislative window that may not come.

Areas for Future Research

The six states featured in this brief are early movers, but as more states consider similar reforms, the absence of outcome data is not just a research gap, but a practical problem. Program administrators who want to make the case for resource-intensive policy changes need evidence that the change produces results for families. That evidence does not yet exist, and building it is urgent. As Minnesota's Melissa Froehle put it, federal law should require states to build evaluation capacity into their programs — and provide funding to do it. Without that infrastructure, the field will continue to lack the evidence base needed to make the case for reform.

The most pressing question is whether and how driver's license suspension exemption for low-income NCPs affects child support payment and compliance with orders. Early evidence suggests the answer is complex. A pilot study in Minnesota that preceded the state's 2023 statutory changes found no statistically significant difference in payment amounts or compliance at 12 months.[16] On the other hand, early operational data from Orange County, California found that following implementation of SB 1055, collections increased and administrative workload dropped by the equivalent of two full-time caseworkers.[9] Several of the states interviewed are in the early stages of collecting outcome data, and findings tracked over the next several years — with an eye toward states' various income thresholds — will be particularly informative.

Conclusion

The states represented in this brief (California, Illinois, Maryland, Minnesota, Washington, and Wisconsin) have taken meaningful steps to rethink how driver's license suspension is applied. Other states are watching, and the groundwork being laid in how these policies are structured and protected will shape the policies that follow. To move forward in a way that supports implementation and active learning, states should design with everyone at the table, reduce agency burden where possible, invest in iterative training and communication with staff, and codify their policy deliberately. States must also have the funding and infrastructure to measure and learn what works.

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Appendix A

State	Child Support Director or Representative
California	Kristen Erickson-Donadee, Director, California Child Support Services Nicole Darracq, Assistant Director, Office of Communication and Public Affairs, California Child Support Services Rebecca Miller, Western Center for Law on Poverty
Colorado	Larry Desbien, (Former) Director, Division of Child Support Services, Colorado Department of Human Services
Illinois	Bryan Tribble, Administrator, Division of Child Support Services, Illinois Department of Healthcare and Family Services
Maryland	Jenna Janocha, Director, Policy and Training, Maryland Department of Human Services Child Support Administration
Minnesota	Melissa Froehle, Deputy Director, Child Support Division, Family Well-Being Administration, Minnesota Department of Children Youth, and Families
North Dakota	Jim Fleming, Director, Child Support Section, North Dakota Department of Health and Human Services
Washington	Monica Turnbaugh, Deputy Policy Administrator, Washington Division of Child Support Serena Hart, Policy, Legal and Publication Manager, Washington Division of Child Support
Wisconsin	Phyllis Fuller, Director, Bureau of Child Support, Wisconsin Department of Children and Families Aviva Gellman, Program and Policy Analyst-Advanced, Bureau of Child Support, Wisconsin Department of Children and Families Maggie Renno, Director, Bureau of Research and Analytics, Wisconsin Department of Children and Families