



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

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IV-D MEMORANDUM 2017-018

TO: All Friend of the Court (FOC) Staff
All Prosecuting Attorney (PA) Staff
All Office of Child Support (OCS) Staff

FROM: Erin P. Frisch, Director
Office of Child Support

DATE: July 17, 2017

UPDATE(S):

Manual

Form(s)

SUBJECT: Implementation of the Case Closure Improvement Plan (CCIP)

ACTION DUE: None

POLICY EFFECTIVE DATE: Upon receipt

PURPOSE:

This IV-D Memorandum announces the implementation of the Case Closure Improvement Plan (CCIP).

In IV-D Memorandum 2017-015, *Fiscal Year (FY) 2016 Self-Assessment (SASS) Audit Results*, published on July 6, 2017, OCS provided information on the most recent SASS audit results and indicated that information on the CCIP would be forthcoming.

By implementing the CCIP, Michigan's IV-D program will continue its corrective actions to improve case closure after failing the federal benchmark for Case Closure in the FY 2015 SASS audit and following a corrective action plan (CAP) for Case Closure during FY 2016. The Performance Management Workgroup has reviewed and supports the CCIP.

DISCUSSION:

A. Background

Federal regulations require the Michigan child support program to perform a yearly SASS audit.¹ One of the eight program criteria measured in the SASS audit is Case Closure. While the federal regulations permit most SASS criteria to be as low as 75

¹ Ref: Subsection 454(15) of the Social Security Act and 45 Code of Federal Regulations (CFR) 308.2.

percent to be considered successful, for the Case Closure criterion, **90 percent** or more of the IV-D cases closed by Michigan's child support program in the FY must meet specific federal requirements for closure.²

This criterion has a higher threshold because closing a child support case is a significant event. It is important for the program to hold itself to a high standard in this area and ensure that governmental services for which the family is entitled are not inappropriately terminated.

Therefore, closing the IV-D case appropriately is important to the family. The IV-D case must close for one or more federally prescribed reasons, and for most of those reasons, the IV-D agency must send a 60-day case closure notice to both the custodial party (CP) and non-custodial parent (NCP). Sending the case closure notice to the family, when appropriate, provides an opportunity for the NCP or CP to disagree or to provide new helpful information that can advance his/her case.

1. FY 2015 SASS Audit

Michigan failed the FY 2015 SASS audit with a rate of 89.87 percent. Errors were attributable to two main factors:

- System errors related to the revamping of the automated case closure process in the Michigan Child Support Enforcement System (MiCSES); and
- Improper use of manual case closure reason codes.

In FY 2015, a case failed the audit if it closed for an inappropriate reason code (e.g., the circumstances of the case called for the reason code "PG – Child Does Not Reside With or Under Supervision of the CP," and the worker instead used "NS – No Viable IV-D Services").

2. Corrective Action Plan (CAP) for FY 2016

As a result of the failure in FY 2015, Michigan entered a federal CAP for the Case Closure criterion. The CAP was effective during FY 2016. CAP activities included outreach, policy updates, and training to continue to address the issue of IV-D staff incorrectly using manual case closure reason codes within MiCSES.

² Ref: 45 CFR 303.11 and [Section 3.50, "Case Closure," of the Michigan IV-D Child Support Manual](#).

3. FY 2016 SASS Audit

In FY 2016, OCS Planning and Evaluation determined that a case would meet federal requirements and **pass** the audit despite the use of an inappropriate reason code, **as long as the 60-day notice was sent, if required** (e.g., the circumstances of the case called for the reason code PG and the worker instead used NS; however, the NS reason code sends the notice, so the case passes). This was a change from the FY 2015 audit.

Michigan improved its performance for the FY 2016 SASS audit, meeting federal requirements for closure of a IV-D case in 92.47 percent of sampled cases. While Michigan exceeded the federal benchmark of 90 percent, 79 percent of the case closure errors in the SASS audit sample were due to one of the following:

- The case closure notice³ was required but not sent; or
- The case closure notice was sent, but the case was closed prior to 60 days elapsing from the date the notice was sent.

As a result, OCS created the CCIP in an effort to proactively continue the case closure improvements made since the FY 2015 SASS audit. The CCIP is meant to ensure quality in the service that the child support program provides to families.

B. Case Closure Improvement Plan (CCIP)

The CCIP consists of two major initiatives. The first is an ongoing quality assurance review by OCS Planning and Evaluation staff. The second is a query that allows local offices to self-review workers' use of case closure reason codes.

1. OCS Case Closure Quality Assurance Evaluation

The FY 2016 SASS audit revealed that the "MZ" reason code – "Case Merged/Opened in Error" – was the most misused by IV-D staff. Of the 651 total closed cases in the SASS audit sample, 26 cases in 15 counties were closed inappropriately with the MZ reason code. Fifty-three percent of the 49 cases that failed did so for that reason.

Cases that close with the MZ reason code do not send a case closure notice.

OCS Planning and Evaluation staff will conduct quality assurance evaluations throughout the FY (as resources are available), reviewing cases that closed using the MZ reason code during the previous three months. The first evaluation will begin after the publication of this IV-D Memorandum.

³ Ref: 45 CFR 303.11(c).

The first evaluation will focus on the OCS Case Management Section and offices in 15 counties identified in the FY 2016 SASS audit as most commonly using the MZ reason code incorrectly. Other counties will be included in subsequent evaluations. OCS Planning and Evaluation staff will evaluate closed cases in all functional areas.

After each quality assurance evaluation is concluded, OCS Planning and Evaluation staff will reach out individually to each office (a county PA or FOC office, or to the OCS Case Management Section for support specialists) identified as having misused the MZ reason code in that review period. The office will be provided the IV-D Case ID and other case details for each case closed inappropriately with that reason code.

Offices identified as having misused the MZ reason code will be asked to review the case and confirm that the code was inappropriately used pursuant to IV-D policy. If the MZ reason code was misused, the office will send notifications to the members on that IV-D case if the circumstances of the closure require notification. The notification letter will indicate that the IV-D case has been closed. It will also tell members the circumstances necessary, and the steps they can take, to reopen the case. OCS will provide offices with suggested wording for the letter.

If an office continues to struggle with the inappropriate use of the MZ reason code after multiple quality assurance evaluations, OCS can provide additional assistance to help identify the root causes of the misuse.

2. Query to Self-Review Workers' Use of Case Closure Codes

a. A local office may request Ad Hoc Query 510334 to self-review its workers' use of case closure reason codes.⁴ To run the query, the local office must provide Data Warehouse staff with four elements:

- The county;
- Whether the query will be run for a specified reason code(s) or all reason codes;
- Whether the query will be run for a specified worker(s) or all workers; and
- The date range⁵ that the query will cover.

⁴ Ref: the [System Reports \(Ad Hoc Queries\) page](#) on mi-support for information on how to request an Ad Hoc query.

⁵ The query returns cases that were *set for closure* within a specified timeframe. It does not return cases based on the date the case was actually closed.

b. The query returns the following fields:

- *Reporting Period*;
- *IV-D Case ID*;
- *IV-D Case County*;
- *Docket ID* (if the IV-D case has an associated docket);
- *Docket County* (if the IV-D case has an associated docket);
- *Docket Status* (if the IV-D case has an associated docket);
- *Docket Closed Dt* (if the docket associated to the IV-D case is closed);
- *Worker* (the worker who set the IV-D case to close);
- *Dt Set to Close* (the date the worker performed the action in MiCSES to start closing the IV-D case);
- *CC Reason Code* (case closure reason code);
- *Date Case Closed/Scheduled to Close/Moved from non-“L” to “L”*;⁶ and
- *Functional Area of the Worker* (the worker who set the case to close).

If resources are available to local offices, OCS Planning and Evaluation recommends that each local office perform a self-review of the MZ reason code quarterly to determine whether the code is being used correctly according to policy.⁷ Offices may also self-review other case closure reason codes using this query.

OCS and Data Warehouse staff intend to convert Ad Hoc Query 510334 to Business Objects so office managers can run it on-demand. OCS will send an email notification when this occurs.

3. Other Initiatives

The Performance Management Workgroup has submitted a request to the Michigan Family Support Council asking that a training session on case closure be included in its 2017 fall conference.

OCS Planning and Evaluation staff will discuss CCIP results with the Program Leadership Group, and Work Improvement Teams (WITs). They will also discuss the CCIP in the Child Support Updates call and in other forums as appropriate.

NECESSARY ACTION:

Retain this IV-D Memorandum until further notice.

⁶ On the MiCSES *Case Member Details* (CASE) screen, an “L” type case is non-IV-D. When a case moves from a non-“L”-type case to an “L”-type case, the IV-D case has closed and IV-D services have been terminated, but the MiCSES case remains open.

⁷ Ref: Section 3.50 of the *Michigan IV-D Child Support Manual*.

REVIEW PARTICIPANTS:

Performance Management Workgroup
Program Leadership Group

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None

SUPPORTING REFERENCES:

Federal
Subsection 454(15) of the Social Security Act
45 CFR 303.11
45 CFR 303.11(c)
45 CFR 308.2

State
None

EPF/JJV