

STATE OF MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES LANSING

NICK LYON DIRECTOR

IV-D MEMORANDUM 2018-005

TO:	All Friend of the Court (FOC) Staff All Prosecuting Attorney (PA) Staff All Office of Child Support (OCS) Staff	UPDATE(S):
FROM:	Erin P. Frisch, Director Office of Child Support	☐ Manual ☐ Form(s)
DATE:	May 25, 2018	

SUBJECT: Uploading Documents to the Historical Reprints (FHST) Screen

in the Michigan Child Support Enforcement System (MiCSES)

RESPONSE DUE: None

POLICY EFFECTIVE DATE: Upon receipt

PURPOSE:

RICK SNYDER

GOVERNOR

This IV-D Memorandum explains new functionality to upload and retrieve documents on the MiCSES FHST screen. This functionality will be implemented with MiCSES 9.9 Release on June 1, 2018.

The new FHST functionality will provide IV-D staff a secure way to upload and share documents in MiCSES without using encryption. Documents that may be uploaded and shared include locate reports, birth records, employment verifications, child support orders, and death certificates. Documents may be uploaded for both IV-D cases and non-IV-D cases.

All counties will be able to use this functionality, regardless of whether they have an imaging system. This functionality itself is not an imaging system and will not integrate with uploading functions in the MiChildSupport Portal or the Info-Trac system at the Michigan State Disbursement Unit (MiSDU).

DISCUSSION:

A. Background

OCS decided to develop and implement the FHST screen upload functionality to improve IV-D staff access to case-related documents, particularly for counties

without imaging systems and for cases in multiple counties. Uploading documents in MiCSES will make it easier for all IV-D staff to access documents and share documents across counties without using encryption.

Additional benefits of the FHST upload functionality include the following:

- Families with cases in multiple counties will not have to give the same information to different counties;
- FHST documentation will help to keep a record of requested activity for case members (e.g., a change of legal address); and
- IV-D staff will be able to upload documents instead of entering lengthy notes on the *Notes Processor* (NOTE) screen.

Currently, there is no requirement to use the FHST upload functionality for any particular form or document. In the future, OCS, in partnership with IV-D staff, may determine that certain forms must be uploaded to comply with audit requirements, to increase efficiency, or to ensure security (reduce email and encryption).

B. Documents That Can Be Uploaded

1. Document Categories

When IV-D staff click the *Upload* button on the FHST screen, the New Upload browser window will appear. In this window, the *Category* drop-down lists the four categories of items that may be uploaded. The categories and examples of documents that may be uploaded in each category are listed below. Exhibit 2018-005E1 contains a copy of this table that IV-D staff may use for reference.

Category	Examples of Documents in the Category
Address/Income/Locate	Locate reports, postal verifications, employment verifications, copies of driver's licenses, Social Security number verifications, bank statements or pay stubs with account information redacted ²
Letters/Non-MiCSES forms ³	General correspondence, <i>IV-D Child Support</i> Services Application/Referral (DHS-1201) (paper form), Application for <i>IV-D Child</i> Support Services (For Privately Filed

¹ Ref: the MiCSES 9.9 Release notes for information about changes to the FHST screen.

² Ref: Subsection 8.4 in <u>Section 1.10</u>, "<u>Confidentiality/Security</u>," of the <u>Michigan IV-D Child Support Manual</u> regarding the redaction of confidential information.

³ A document is considered a non-MiCSES form if it is not pre-populated by MiCSES. This includes forms that are generated by MiCSES and sent to parties or employers to complete and return to OCS or the FOC.

Category	Examples of Documents in the Category
	Domestic Relations Cases Only) (DHS-1201D), the Request to Protect Information (MDHHS-5728), Federal Child Support Portal ⁴ documents (Insurance Claims Data Match, e-IWO employer search results, etc.), MiChildSupport Portal documents, other non-MiCSES-generated forms and letters
Court documents	Bankruptcy documentation, child support orders (exclusion orders, out-of-state orders), divorce decrees, Personal Protection Orders, <i>Orders of Filiation</i> or other court determinations of paternity, and genetic test results without genetic marker information
Vital Records	Birth records, death certificates, Affidavit of Parentage

2. Document Types

The following types of files may be uploaded:

- .pdf;
- .jpg;
- .jpeg;
- .doc;
- .docx;
- .xls;
- .xlsx;
- .pnt; and
- .bmp.

3. Document Size

Uploaded documents cannot be larger than 1 megabyte (MB). If a document is larger than 1MB, the FHST screen will display a warning message. The user may try to reduce the file size by saving the file in another format and uploading again.

⁴ Ref: <u>Section 3.06, "Federal Child Support Portal," of the *Michigan IV-D Child Support Manual* for more information about the portal.</u>

C. Documents That Cannot Be Uploaded

Documents that must not be uploaded to the FHST screen are detailed below. Generally, IV-D staff should upload a document only if it is needed to progress a IV-D case or to accomplish IV-D work.

1. Documents That Contain Federal Tax Information (FTI)

IV-D staff must not upload documents that contain FTI. IV-D staff may come into contact with FTI outside of MiCSES but within the administration of the child support program.⁵ FTI consists of federal tax return and return information (and personally identifiable information derived from it) that the IV-D program receives from the Internal Revenue Service (IRS). FTI reports (e.g., reports with federal tax refund offset [FTRO] information) can be generated from other IV-D systems such as the Federal Child Support Portal.

MiCSES does not have the ability to track documents with FTI that are uploaded to the FHST screen. Conversion of FTI from paper to electronic media (scanning) or from electronic media to paper (print screens or printed reports) requires tracking from creation to destruction of the converted FTI. Therefore, IV-D staff must not upload documents that contain FTI until OCS develops further policy to address IRS safeguarding requirements.

2. Documents That Contain Medical Records or Histories

When uploading and storing medical documentation in MiCSES, IV-D staff should be aware of Health Insurance Portablity and Accountability Act of 1996 (HIPAA) requirements.⁶ IV-D staff must not upload documents that contain medical records and histories because OCS is not a "covered entity" under HIPAA, and these documents are not relevant to child support enforcement and establishment.

Examples of medical documents that must not be uploaded to the FHST screen include lab results, X-rays, and genetic test results that contain genetic markers.

3. Ad Hoc Queries, Spreadsheets or Documents With Members Not Associated to a Case or Docket

IV-D staff cannot upload ad hoc queries, spreadsheets or other documents to a case or docket if they contain information on multiple members not related to the

⁵ Ref: Section 1.10 of the *Michigan IV-D Child Support Manual*.

⁶ 45 Code of Federal Regulations (CFR) Part 160 and Part 164, Subparts A and E; Ref: the <u>Standards for Privacy of Individually Identifiable Health Information ("Privacy Rule")</u>. The Privacy Rule protects all "individually identifiable health information" held or transmitted by a covered entity or its business associate, in any form or media, whether electronic, paper, or oral.

case or docket. It would be inappropriate to include an individual's information on a case not associated to him/her.

4. Debit/Credit Card Information and Checks

IV-D staff must not upload any documents containing copies of debit/credit cards or debit/credit card numbers. IV-D staff also must not upload checks or deposit slips.

5. Information From Non-IV-D Systems

IV-D staff may have access to other non-IV-D systems that do not permit the use of data for purposes other than specifically described in the user agreement. IV-D staff must not upload copies of printouts from other non-IV-D systems that prohibit the use and disclosure of data. For example, IV-D staff must not upload copies of printouts that contain information from the Law Enforcement Information Network (LEIN).⁷

6. Court Records That Contain Confidential Information

For information on court record types that have access limited by statute, court order, or court rule, reference the State Court Administrative Office (SCAO) document Nonpublic and Limited-Access Court Records. Examples of these records include adoption court records and child abuse and neglect records.

D. Security Considerations for Uploaded Documents

Documents With Identifying Information for Cases With Family Violence

Cases with family violence in MiCSES are marked with a code that suppresses the custodial party's (CP's) personal identifying information from MiCSES-generated documents.⁸ However, MiCSES does not have the ability to suppress or mask the CP's identifying information on documents retrieved from the FHST screen. IV-D staff must consider this when handling FHST documents for cases with family violence.

Medical Documents That Do Not Contain Medical Records or Histories

Medical documents may be uploaded if they do not contain an individual's medical records or history. For example, IV-D staff may upload a disability benefits approval from the Social Security Administration if a medical diagnosis is

⁷ For additional restrictions regarding the use of LEIN information, reference <u>Section 6.45, "Bench Warrants/LEIN," of the *Michigan IV-D Child Support Manual.*</u>

⁸ Ref: Subsection 9.9.2 in Section 1.10, "Confidentiality/Security," and <u>Section 1.15, "Family Violence," of the Michigan IV-D Child Support Manual</u> for more information.

not included in the letter. Additionally, doctor's notes and disability paperwork may be uploaded if they do not contain medical information.

E. Special Considerations for Non-IV-D Cases

OCS defines what documents must not be uploaded to its IV-D system (MiCSES). Regarding non-IV-D case information, Friends of the Court can determine what is appropriate to upload to the FHST screen based on SCAO directives or local office practices.

F. Uploading and Retrieving Documents on the FHST Screen⁹

1. Uploading Documents

When uploading a document to the FHST screen, IV-D staff will browse for and select the file to upload, select the category, and enter a description of the document. OCS advises IV-D staff to use caution when determining which documents to upload to the FHST screen because once documents are uploaded, only information technology staff can remove them.

Note: MiCSES cannot identify the type of document that is uploaded. For example, it cannot tell if a document is a letter or a birth certificate. Therefore, it is important to select the appropriate document category and enter the name of the specific document. Otherwise, the categories will become cluttered, unhelpful, and inefficient for retrieval.

IV-D staff will complete one or more of the fields known as Unique Identifiers:

- Member ID;
- IV-D Case ID:
- CAR¹⁰ ID; and
- Docket ID / County Number.

These are the case-identifying elements that associate the document with the case it belongs to. The more identifiers that IV-D staff include when uploading the document, the easier it will be for users to retrieve the document from MiCSES later. One identifier is required for uploading, but at least two identifiers are recommended.

After the document is uploaded, OCS recommends adding a note on the NOTE screen to indicate that the document is available in MiCSES.

⁹ For detailed instructions on uploading documents, reference the <u>MiCSES Quick Reference Guide</u> – <u>Upload a Document</u>.

¹⁰ CAR stands for "court action referral."

2. Retrieving Documents

To search for and retrieve a document(s) that has been uploaded, IV-D staff will enter case-identifying information on the FHST screen. They may complete one or more of the Unique Identifier fields used for uploading (*County ID*, *IV-D Case ID*, *CAR ID*, *Docket ID*, or *Member ID*), or they may type "ALL" in the *Functional Area* field to bring up any uploaded documents that fit other requirements.¹¹

G. Printing and Saving Documents From the FHST Screen

When printing and saving documents from the FHST screen, IV-D staff must adhere to safeguarding, storing, handling, disclosure, disposing, and labeling requirements for IV-D confidential information.¹²

NECESSARY ACTION:

Retain this IV-D Memorandum until further notice.

REVIEW PARTICIPANTS:

Financial Work Improvement Team Program Leadership Group

CONTACT PERSON:

Jennifer Arsenault OCS Policy Analyst (517) 241-5036 ArsenaultJ@michigan.gov

Tamara Marques
OCS Security Analyst
(517) 241-5017
MarquesT@michigan.gov

CC:

None

SUPPORTING REFERENCES:

<u>Federal</u>

45 CFR Part 160 and Part 164, Subparts A and E

¹¹ For more information on document retrieval from the FHST screen, reference the <u>MiCSES Quick</u> <u>Reference Guide – Upload a Document.</u>

¹² Ref: Section 1.10 of the Michigan IV-D Child Support Manual.

State None

ATTACHMENT:

Exhibit 2018-005E1: FHST Screen Categories for Document Uploads

EPF/SLM