



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

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IV-D MEMORANDUM 2020-031

TO: All Friend of the Court (FOC) Staff
 All Prosecuting Attorney (PA) Staff
 All Office of Child Support (OCS) Staff
 All Michigan State Disbursement Unit (MiSDU) Staff

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

DATE: November 10, 2020

SUBJECT: Michigan State Disbursement Unit (MiSDU) Vendor Transition Information, Including Revised Forms and Publications

<p>UPDATE(S):</p> <p><input type="checkbox"/> Manual</p> <p><input checked="" type="checkbox"/> Form(s)</p>
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ACTION DUE: None

POLICY EFFECTIVE DATE: Upon receipt

PURPOSE:

This IV-D Memorandum announces revisions to forms, publications, websites, and other materials as a result of the transition to a new vendor for the administration of MiSDU services. The transition from the current vendor, Informatix, Inc., to Conduent State & Local Solutions, Inc. (Conduent) will be complete on November 30, 2020.¹

This IV-D Memorandum also discusses the Way2Go Card² pre-acquisition disclosure and fee schedule. Content in this IV-D Memorandum replaces and obsoletes IV-D Memorandum 2019-003, *U.S. Bank ReliaCard Pre-Acquisition Disclosure and Fee Schedule*. In addition, Exhibit 2019-003E1, U.S. Bank ReliaCard Disclosure Insert, is being obsoleted and replaced by Exhibit 2020-031E1, Way2Go Card Disclosure Insert.

Exhibit 2015-007E1, Electronic Disbursement of Support – Frequently Asked Questions, is being obsoleted and replaced by Exhibit 2020-031E2. The title of the exhibit will remain the same. Significant changes to this document since its last publication are identified with a change bar in the right margin.

¹ For additional information on the transition to the new MiSDU vendor, reference [IV-D Memorandum 2020-028, Transition to a New Vendor for the Michigan State Disbursement Unit \(MiSDU\)](#).

² The Way2Go Card prepaid Mastercard will replace the U.S. Bank ReliaCard as the prepaid debit card on which custodial parties (CPs) will receive their child support payments.

Additionally, with the transition to the new MiSDU vendor, IV-D staff will no longer submit the *Request for Central Receipt Adjustment/Suspense Work* (DHS-307) by encrypted email. OCS policy will be updated in the future to reflect this change.

DISCUSSION:

A. OCS Form Revisions

Eleven forms have been updated due to the transition to the new MiSDU vendor. Six of the forms have been revised with a new Michigan Department of Health and Human Services (MDHHS) nondiscrimination statement³ and updated to meet MDHHS usability standards for people with disabilities. Most of these forms have minor text changes in addition to these changes. The five remaining forms have content changes only. Changes to these forms are described below.

1. Forms Updated With the Revised MDHHS Nondiscrimination Statement and MDHHS Usability Standards

MDHHS is in the process of enhancing its forms to better serve customers with disabilities. Changes such as enlarged text size and increased space for entering responses make the forms easier to read and use.⁴ Also, forms updated according to MDHHS usability standards cannot include logos.

a. Form Updated With Usability Standards Only

OCS has updated the *Employer Payment Coupon/Remittance* (DHS-1258). to meet MDHHS usability standards, including the removal of the MiSDU logo.

b. Forms Updated With Usability Standards and Minor Text Changes

OCS has revised the following forms with minor text changes in addition to MDHHS usability standards and the removal of the MiSDU logo:⁵

- *Request for Central Receipt Adjustment/Suspense Work* (DHS-307): The “Email to” line was removed;

³ Ref: [MDHHS Administrative Policy Compliance, APX 680](#).

⁴ For a description of MDHHS usability standards, reference [IV-D Memorandum 2019-009, OCS Forms With Updated Michigan Department of Health and Human Services \(MDHHS\) Letterhead and Modified Formatting for Customers With Disabilities](#).

⁵ Any changes to form names in the *Michigan IV-D Child Support Manual* will be updated as needed in a future revision to the manual.

Note: Conduent is working on instructions to submit the DHS-307 electronically through KidSTAR beginning on November 30, 2020.⁶ IV-D staff may also continue to submit DHS-307 requests by fax or mail as described in IV-D Memorandum 2005-011.⁷

- *Temporary Payment Coupon* (DHS-831): The word “obligors” was replaced with “child support payers,” and the instructions were revised for ease of reading;
- *Debit Card Authorization* (DHS-1371): The “Other Phone” field was replaced with a “Date of Birth” field;
- *Address Change Request* (DHS-1376): The name of the form was changed from *Address Change Form* to *Address Change Request*. The field “Other Telephone Number” was changed to “Cell Phone Number.” Also, an “Email Address” field was added.⁸
- *Direct Deposit Authorization* (DHS-1377): The name of the form was changed from *Direct Deposit Authorization Form* to *Direct Deposit Authorization*. The “Other Phone” field was replaced with a “Date of Birth” field.

2. Forms With Content Changes Only

a. User Access Security Forms

The MiSDU transition affects the:

- *IV-D Program Request to Delete Computer Access* (DHS-392);
- *IV-D Program Request for Computer Access* (DHS-393); and
- *IV-D Program Request for Changing Computer Access* (DHS-395).

In addition to minor formatting updates, each of these forms was revised with the following changes:

- Information regarding Web Resource Center Info-Trac was replaced with KidSTAR (and its user roles, if applicable);⁹ and

⁶ KidSTAR is replacing Web Resource Center (WRC) Info-Trac. Ref: IV-D Memorandum 2020-028 for more information.

⁷ Ref: [IV-D Memorandum 2005-011, Submission of the Request for Central Receipt Adjustment/Suspense Work Form \(DHS-307\); Revised Computer Access Forms; Access to TierTrac.](#)

⁸ As a result of partner feedback and several customer service improvement initiatives, OCS is adding cell phone number and email address fields to OCS-owned forms as they are updated. This important contact information can be used for texting and electronic communication with CPs and non-custodial parents (NCPs).

⁹ OCS will update [Section 1.10, “Confidentiality/Security,” of the Michigan IV-D Child Support Manual](#) with information about the KidSTAR user roles at the next available opportunity.

- A field for OneSpan Sign eSignature was added.¹⁰

Other specific changes are described below.

1) DHS-393 and DHS-395

The e-IWO user role was removed from the list of roles for the Federal Child Support Portal.¹¹

2) DHS-393

OCS added a statement under the User Agreement regarding compliance with background investigation requirements. IV-D Memorandum 2020-006¹² discusses these upcoming requirements. In preparation for the procedures for compliance, OCS updated the DHS-393 now. OCS will publish additional information in early 2021.

3) DHS-395

Under the Federal Child Support Portal, the “Electronic Document Exchange (EDE) Superuser” checkbox was moved from the OCS-only roles to the Enhanced Access roles.

b. *Billing Coupon* (DHS-1259)

OCS made the following changes to the DHS-1259:

- Added a monthly coupon;
- Moved the coupon instructions to the back of the form, and added a statement to the main page that coupon instructions are on the back of the form;
- Removed the Social Security number (SSN) field to avoid unnecessary inclusion of this sensitive data;
- Added a Member ID to aid payment posting;
- Added a change of address checkbox;¹³ and
- Replaced the MICR¹⁴ line with bar codes.

¹⁰ OneSpan Sign eSignature is software that will be introduced in an upcoming IV-D Memorandum; IV-D staff will not use this field at this time.

¹¹ The e-IWO user role is no longer available on the Federal Child Support Portal. The Office of Child Support Enforcement decommissioned the role in 2018. OCS will update [Section 3.06, “Federal Child Support Portal,” of the Michigan IV-D Child Support Manual](#) with this information at the next available opportunity.

¹² Ref: [IV-D Memorandum 2020-006, Internal Revenue Service’s \(IRS’s\) Background Investigation Requirements: Local Office Preparation Encouraged.](#)

¹³ [Section 3.15, “Addresses,” of the Michigan IV-D Child Support Manual](#) will be updated in the future to include the DHS-1259.

¹⁴ MICR stands for magnetic ink character recognition code; the new vendor uses bar codes instead.

c. *Notice Regarding Your Electronic Payments* (FEN805)

The FEN805 is generated in MiCSES once a quarter after the member merge process runs. This form notifies the MiCSES member that his/her electronic funds transfer (EFT) has been changed and/or that EFT will be used for future disbursements. OCS has revised the FEN805 with clearer language for customers. In addition, the last four numbers of the customer's debit card will appear on the debit card version of the FEN805. The FEN805 includes a copy of the DHS-1377.¹⁵

The FEN805 is in MiCSES and requires a release to update. It will be updated with the MiCSES 10.5.2 Release on November 13, 2020.

B. OCS Publication Revisions

OCS has updated the *Child Support Marketing Card* (DHS-Pub-139) with Way2Go Card information and minor revisions. There are two versions of the *Child Support Marketing Card*:

- DHS-Pub-139-PA, which contains PA and FOC contact information; and
- DHS-Pub-139-FOC, which contains FOC contact information.

County staff may order copies of the card by sending an email to the MiCSES Help Desk.¹⁶

C. Updates to Websites

The MiSDU website (www.misdu.com) will be updated to incorporate all changes due to the transition to Conduent. Conduent will redesign the website with an updated look and feel that is more user-friendly. OCS will send an email notification when the website is updated.

OCS will update the [MiSDU page](#) on mi-support with published notifications, policies and procedures related to the MiSDU vendor transition.

¹⁵ For more information on the FEN805, reference [Michigan IV-D Action Transmittal 2009-005, Member Merge](#) and [IV-D Memorandum 2019-011, Updates to the Notice Regarding Electronic Payments \(FEN805\)](#).

¹⁶ Ref: [Section 1.35, "MiChildSupport Portal," of the Michigan IV-D Child Support Manual](#) for more information about the *Child Support Marketing Card*. The mi-support [Public Materials](#) page contains an image of the marketing card and IV-D staff instructions for ordering cards. A copy of the marketing card is not attached to this memorandum.

OCS has updated the Frequently Asked Questions (FAQs) regarding electronic disbursement of support. These FAQs are accessible via a link on the [MDHHS child support website](#).¹⁷

D. Updates to Electronic Disbursement of Support – Frequently Asked Questions (Exhibit 2020-031E2)

OCS has updated the FAQs regarding electronic payments with information about the Way2Go Card. The FAQs will help customers with common questions about electronic payments. Also, IV-D staff may refer to these FAQs when assisting child support customers with questions. A link to the FAQs appears on the MDHHS child support website and on the MiSDU website.

E. Way2Go Card Pre-Acquisition Disclosure and Fee Schedule (Exhibit 2020-031E1)¹⁸

1. Overview

Federal regulations require the provision of comprehensive disclosure information to CPs prior to acquiring the Way2Go prepaid debit card. Therefore, the Michigan IV-D program will provide disclosure documents¹⁹ before CPs acquire a Way2Go Card. The IV-D program will also provide a statement that the CP does not have to accept the Way2Go Card and has options for receiving child support payments.²⁰

2. Background

On October 5, 2016, the federal Bureau of Consumer Financial Protection issued a new federal regulation for prepaid accounts under Regulation E: The Electronic Fund Transfer Act.²¹ The new federal regulation, which is commonly referred to as the Prepaid Rule, extends Regulation E coverage to prepaid accounts.²² Prepaid accounts include the Way2Go debit card that Michigan's IV-D program uses to electronically disburse child support payments to families. The Prepaid

¹⁷ From the MDHHS home page, go to Child Support → Parent Resources → Payments → Frequently Asked Questions. Ref: Section D of this memorandum for more information about the FAQs.

¹⁸ Federal requirements regarding pre-acquisition disclosure and fee schedules were originally described in IV-D Memorandum 2019-003. However, because OCS is obsoleting that memorandum with the publication of this one, the information from that memorandum is included in this section.

¹⁹ Ref: IV-D Memorandum 2020-028 for more information about these documents.

²⁰ The Michigan IV-D program began taking these actions with its debit card on April 1, 2019. The Bureau of Consumer Financial Protection extended the overall effective date of the federal requirements from April 1, 2018 to April 1, 2019. Ref: The Bureau of Consumer Financial Protection Final Rule, [Rules Concerning Prepaid Accounts Under the Electronic Fund Transfer Act \(Regulation E\) and the Truth in Lending Act \(Regulation Z\)](#).

²¹ Ref: [15 United State Code \(USC\) 1693](#).

²² 12 Code of Federal Regulations (CFR) 1005.15 is published on [page 84326, Volume 81, Number 225 of the Federal Register](#).

Rule requires the financial institution²³ to provide customers comprehensive information regarding prepaid account terms and conditions before they open the account. Therefore, the Michigan IV-D program is required to provide CPs complete disclosure information for the Way2Go Card before they receive the card. This information includes fee schedules, credit protection rights, and instructions for CPs to choose the method in which they will receive child support payments.²⁴

3. Way2Go Card Disclosure Documents²⁵

The Michigan IV-D program will provide CPs with two disclosure documents prepared by Comerica Bank, which issues the Way2Go Card.²⁶

- The Short Form (Pre-Acquisition Disclosure) contains a brief summary of Way2Go Card fees. It also notifies recipients they have two direct deposit options: their personal bank account or the **prepaid** debit card account; and
- The Long Form (Fee Schedule) provides comprehensive fee information and consumer financial protection information.

These form requirements were already met for those CPs who currently hold a U.S. Bank ReliaCard when they received the mailing that the MiSDU issued earlier this fall. This mailing is described in IV-D Memorandum 2020-028.

4. Delivery of Disclosure Documents

Effective November 30, 2020, the Michigan IV-D program will provide Way2Go Card disclosure information to new recipients of child support payments before they acquire a Way2Go Card.

The MiSDU will print the Pre-Acquisition Disclosure and Fee Schedule as a two-sided insert and mail the insert to new payees with their first support payment check. Reference Exhibit 2020-031E1 for a sample of the insert.

5. Acquiring the Way2Go Card

Michigan's IV-D program offers two ways for a CP to acquire a Way2Go Card:

²³ A government agency is considered a financial institution under Regulation E of the Electronic Funds Transfers Act. Ref: 12 CFR 1005.15(a) for more information.

²⁴ Ref: 12 CFR 1005.15 and 12 CFR 1005.18 for specific language that must be included on the disclosures.

²⁵ The content in the disclosure documents is owned by Comerica Bank.

²⁶ There are instances under the Prepaid Rule that allow only the Short Form to be provided; however, because the Way2Go Card is not available for purchase in retail locations, both disclosures must be provided at the same time.

- The MiSDU mails CPs their first support payment by paper check. Included in that mailing is the *Direct Deposit Authorization* (DHS-1377)²⁷ along with instructions indicating that recipients must choose either direct deposit or a debit card for future support payments.²⁸ The MiSDU will also include the disclosure insert in this mailing. To select direct deposit to their checking or savings account, CPs must complete and return the DHS-1377 within 21 days. If customers do not return the DHS-1377, they will automatically receive a Way2Go Card. IV-D staff should encourage new CPs to wait for their first paper check from the MiSDU to ensure they receive the disclosure.
- CPs who currently receive child support funds electronically disbursed to their personal bank account have the option to switch to a Way2Go Card by completing and returning the *Debit Card Authorization* (DHS-1371).²⁹ When CPs request the DHS-1371, MiSDU staff will attach the disclosure document to the form. The disclosure document will also be available on the MiSDU website.

Note: If the DHS-1371 is available for public access in local offices, IV-D staff **must** print the disclosure document and attach it to the DHS-1371.

6. Additional Information

IV-D staff and CPs may direct their disclosure-related questions to the MiSDU. Financial questions may be directed to Way2Go Customer Service by calling 1-844-649-9843 or by visiting www.GoProgram.com.

Customers with questions about remaining balances or fees on their U.S. Bank ReliaCard can visit www.usbankreliacard.com or call U.S. Bank Customer Service at 1-855-233-8374.

NECESSARY ACTION:

Retain this IV-D Memorandum until further notice. County IV-D offices are encouraged to add links to the updated forms to their websites rather than upload the forms to the websites. They are also asked to remove any old versions of the forms from their websites. Offices should replace any hard copies of old forms in their offices with the updated forms.

With the publication of this policy, the following are obsolete:

²⁷ A copy of the DHS-1377 is included with the FEN805. Ref: Section A(2)(c) of this memorandum for more information.

²⁸ This process is temporarily suspended during the transition to the new MiSDU vendor but will resume on or around November 30, 2020. Ref: Michigan Compiled Law (MCL) 400.236 for more information on requirements about changing child support payments from paper checks to electronic disbursement.

²⁹ This process is temporarily suspended during the transition to the new MiSDU vendor but will resume on or around November 30, 2020.

- IV-D Memorandum 2015-007, *Changes to the U.S. Bank ReliaCard Visa (Debit Card)* and Exhibit 2015-007E1; and
- IV-D Memorandum 2019-003 and Exhibit 2019-003E1.

REVIEW PARTICIPANTS:

Financial Work Improvement Team
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CC:

None

SUPPORTING REFERENCES:

Federal
12 CFR 1005.15
12 CFR 1005.18
15 USC 1693

State
MCL 400.236

ATTACHMENTS:

- Exhibit 2020-031E1: Way2Go Card Disclosure Insert
- Exhibit 2020-031E2: Electronic Disbursement of Support – Frequently Asked Questions
- DHS-307: *Request for Central Receipt Adjustment/Suspense Work*
- DHS-392: *IV-D Program Request to Delete Computer Access*
- DHS-393: *IV-D Program Request for Computer Access*
- DHS-395: *IV-D Program Request for Changing Computer Access*
- DHS-831: *Temporary Payment Coupon*

DHS-1258: *Employer Payment Coupon/Remittance*
DHS-1259: *Billing Coupon*
DHS-1371: *Debit Card Authorization*
DHS-1376: *Address Change Request*
DHS-1377: *Direct Deposit Authorization*
FEN805: *Notice Regarding Your Electronic Payments*

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