



STATE OF MICHIGAN

GRETCHEN WHITMER  
GOVERNOR

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
LANSING

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DIRECTOR

**IV-D MEMORANDUM 2024-002**

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

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

**DATE:** February 6, 2024

**SUBJECT:** Elimination of the Child Support Cooperation Requirement for Child Development and Care (CDC) and Introduction of a New Process for CDC-Only Cases

**UPDATE(S):**

Manual

Form(s)

**ACTION DUE:** None

**POLICY EFFECTIVE DATE:** February 25, 2024

**PURPOSE:**

This IV-D Memorandum announces the elimination of the child support cooperation requirement for Child Development and Care (CDC)<sup>1</sup> effective February 25, 2024. OCS will continue to receive CDC referrals from Bridges and offer IV-D services to parents.

In addition, this IV-D Memorandum:

- Discusses changes to the processing of CDC-only<sup>2</sup> referrals received from Bridges;
- Introduces the *Notice of Eligibility – CDC Only (OCS0020)*;
- Provides directions for closing CDC-only cases when the recipient does not request child support services;
- Explains that CDC-only cases currently in noncooperation will be closed; and
- Discusses the impact to existing CDC-only cases in the Michigan Child Support Enforcement System (MiCSES).

<sup>1</sup> For the purposes of this IV-D Memorandum, “Child Development and Care” refers to childcare subsidy programs funded under the Child Care Development Fund (CCDF).

<sup>2</sup> References to “CDC-only” throughout this memorandum refer to a IV-D case in which CDC is the only active assistance type for the custodial party (CP) and dependent(s).

Finally, OCS has made minor updates to the following forms:

- *IV-D Child Support Services Application/Referral* (OCS1201/DHS-1201);
- *Child Support Response Form* (DHS-842); and
- *MiCase Letter* (DHS-1151/MICASELTR).

The updated forms will be implemented in MiCSES with the Child Support 24.0.2 Release on February 9, 2024.

OCS will update Section 2.15, “Cooperation/Noncooperation/Good Cause,” of the *Michigan IV-D Child Support Manual* with the information in this memorandum in a future publication.

## **DISCUSSION:**

### **A. Background**

Federal law<sup>3</sup> requires state agencies administering a Title IV-A<sup>4</sup> program to refer all appropriate individuals receiving public assistance to the Title IV-D program for child support services. In addition, state laws<sup>5</sup> require recipients<sup>6</sup> of **certain** types of public assistance to cooperate with the child support program in establishing paternity and securing support for children receiving these public assistance benefits unless there is a good cause<sup>7</sup> reason.

The CDC assistance program provides financial subsidies to low-income families so they can access the child care services necessary for them to attend work, job training and/or educational programs. It is within the discretion of each state to implement cooperation requirements as a condition of eligibility when receiving a CDC subsidy. Since 2005, 23 states have chosen to establish cooperation requirements for CDC recipients.<sup>8</sup>

Effective February 25, 2024, the Michigan Department of Health and Human Services (MDHHS), in partnership with the Michigan Department of Lifelong Education, Advancement, and Potential (MiLEAP), the department that administers the CDC program, will stop requiring child support cooperation for CDC. Cooperation requirements are intended to improve a family’s overall financial well-being;

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<sup>3</sup> 45 Code of Federal Regulations (CFR) 264.30

<sup>4</sup> Title IV-A programs are funded under the Temporary Assistance for Needy Families (TANF) block grant established by Title IV-A of the Social Security Act.

<sup>5</sup> Ref: Michigan Compiled Laws (MCL) 400.57e and 400.57g.

<sup>6</sup> For the purposes of this memorandum, an “assistance recipient” is defined as a person who receives a benefit from one or more of the following programs: Family Independence Program (FIP), medical assistance programs, Food Assistance Program (FAP), or CDC.

<sup>7</sup> Ref: [Section 2.15, “Cooperation/Noncooperation/Good Cause,” of the Michigan IV-D Child Support Manual](#) for information on good cause determinations and IV-D actions.

<sup>8</sup> Ref: [Office of the Assistant Secretary for Planning and Evaluation’s \(ASPE’s\) Child Support Cooperation Requirements in Child Care Subsidy Programs and SNAP: Key Policy Considerations](#).

participation in the child support program can enhance a child’s financial security and strengthen the ties between the child and parents. However, sanctions for noncooperation can prevent families from receiving and/or accessing the food, shelter, health care, and/or child care assistance that they need. The State of Michigan recognizes the need to, where possible, prevent additional financial hardships for the family and implement *non-punitive* solutions to encourage program participation.

The Child Support Program Strategic Plan states, “(w)e delegate decision-making opportunities to families ... doing so puts them in the best position to be directly accountable to one another for achieving their desired results. We encourage and support voluntary compliance.” OCS anticipates that parents will be more engaged with the child support program if participation is a choice rather than a requirement.

The cooperation requirement for other sanctionable assistance benefits, such as FAP or FIP, will remain unchanged at this time.<sup>9</sup> An assistance recipient who receives CDC **and** any other sanctionable assistance benefit(s) requiring cooperation with the child support program must cooperate as a condition of eligibility for those programs. However, the CDC that recipients receive will not be sanctioned.

Ending the CDC cooperation requirement will affect only a small number of CDC-only cases. To date, there are very few CDC-only cases, and even fewer CDC-only cases that are currently in noncooperation status.<sup>10</sup>

## **B. Processing CDC-Only Referrals From Bridges**

Despite the elimination of child support cooperation requirements for CDC on February 25, 2024, OCS will continue to offer CDC-only recipients the opportunity to request child support services. As a result, OCS will continue to receive CDC-only referrals from Bridges.

### **1. Identifying CDC-Only Cases and Sending the *Notice of Eligibility – CDC Only* (OCS0020)**

On a weekly basis, MiCSES will send the OCS Central Operations Case Management team a query identifying Bridges referrals that are CDC-only cases. Support specialists (SSs) will generate the *Notice of Eligibility – CDC Only* (OCS0020) and send it to the CP. The OCS0020 instructs the recipients to call OCS within 30 calendar days if they wish to start child support services. If

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<sup>9</sup> MDHHS continues to discuss the possibility of ending the cooperation requirement for families receiving FAP. The IV-D program will continue to handle FAP as a benefit program requiring cooperation. If this changes, OCS will issue a IV-D Memorandum announcing that policy change.

<sup>10</sup> As of the publication date of this IV-D Memorandum, there are under 2,000 open cases in MiCSES with a CDC-only benefit assistance type. Of those CDC-only cases, under 150 cases are currently in noncooperation.

recipients do not call OCS within 30 days, OCS will assume that they do not want child support services. However, recipients may apply for child support services in the future.

Note: To allow SSs additional time to manually work CDC-only case referrals, OCS extended the case processing time in MiCSES from five days to 14 days. This extension applies to all referrals, not just CDC-only cases. OCS does not anticipate the extension to have any negative impact on case processing and/or IV-D staff.

After sending the OCS0020, the SS will:

- Manually pull the case out of the workflow (i.e., “park” the case); and
- Wait for a response to the OCS0020 for 30 calendar days.

## 2. Recipient Responses to the OCS0020

### a. Requesting Child Support Services

If the CDC-only recipient requests child support services, the SS will put the case into the proper workflow, and the IV-D program will handle the case the same as any other case for which child support services have been requested. The SS must document on the MiCSES *Notes Processor* (NOTE) screen<sup>11</sup> that the case is a CDC-only case.

However, if the CP later fails to cooperate with the IV-D program, IV-D staff will take the same steps that they do when CPs in non-assistance cases fail to respond to requests. They will consider the case for possible closure rather than place the case into noncooperation.<sup>12</sup>

### b. Declining Child Support Services

SSs will close cases of CDC-only recipients who do not wish to receive IV-D services. The SS will manually close the case by using:

- 1) The “MZ – Case Merged/Opened in Error” closure code if the recipient did not respond within 30 calendar days after the OCS0020 was mailed; or

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<sup>11</sup> Ref: [MiCSES Screen Description: NOTE – Notes Processor](#) for information on adding notes or viewing the narrative history of a child support case.

<sup>12</sup> In the event a CDC-only recipient later fails to cooperate, and the case is set for closure, IV-D staff will manually close the case using the case closure reason code “NS – No Viable IV-D Services.” MiCSES does not currently allow the use of the more appropriate closure code “N9 – CP Uncooperative in Non-Public Assistance Case” in a CDC-only case.

- 2) The “NS – No Viable IV-D Services” closure code if the recipient contacts OCS prior to the expiration of the 30-day waiting period and requests that the case be closed.<sup>13</sup>

In either circumstance, the SS must document on the MiCSES NOTE screen the reason for case closure and that the case is a CDC-only case.

The CDC-only recipient may start child support services at any time upon request, even after the case has been closed.<sup>14</sup>

### 3. CDC-Only Cases and Family Violence

The requirement to cooperate with the IV-D program allows some survivors of family violence to safely pursue paternity and/or child support. When cooperation is required, the State of Michigan provides IV-D services as a condition of public assistance instead of at the survivor’s request; that can protect the survivor from “blame” for pursuing services. Since this new policy does remove that potential buffer, IV-D staff must exercise caution when working with CDC-only cases involving family violence, as they do with all cases. That caution includes properly coding the case, being mindful of communications with participants, carefully scheduling interviews, and other activities that involve both parties.

## C. Closure of CDC-Only Cases Currently in Noncooperation Status

On February 25, 2024, the OCS Central Operations Case Management team will begin to place CDC-only cases that are currently in noncooperation status into cooperation and then close these IV-D cases using the “NS – No Viable IV-D Services” closure code. This code requires a 60-day notice to be sent.<sup>15</sup> This will give the parties an opportunity to request that their child support case remain open. If the party(ies) does not respond to the closure notice within 60 days, the case will close.

If, prior to the expiration of the 60 days, one of the parties contacts OCS to request IV-D services, the case will remain open, and the SS will:

- Determine the reason(s) the case was placed into noncooperation (e.g., missing appointments, failing to appear for a court proceeding, failing to provide requested information, etc.); and

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<sup>13</sup> MiCSES does not currently allow the use of the more appropriate “WQ – Non-Public Assistance Applicant Requests Closure” closure code in a CDC-only case. Consequently, SSs will use the “NS” code.

<sup>14</sup> Ref: [Section 2.05, “Referrals and Applications,” of the Michigan IV-D Child Support Manual](#) and [MiCSES Quick Reference Guide: CASE – Reopen a MiCSES or IV-D Case](#) for information on reopening IV-D cases that were manually closed.

<sup>15</sup> Ref: [Section 3.50, “Case Closure,” of the Michigan IV-D Child Support Manual](#) for information on case closure criteria.

- Gather the information needed or identify the actions necessary to move the case forward.

#### **D. Turning Off the Noncooperation Indicator for CDC-Only Cases**

Effective February 25, 2024, OCS will turn off the noncooperation indicator for CDC-only cases in MiCSES. This will prevent CDC-only cases from being placed in noncooperation status and prevent the party(ies) from receiving unnecessary letters as a result.

#### **E. Introduction of the *Notice of Eligibility – CDC Only (OCS0020)* and Minor Updates to Existing Forms**

OCS, with input from the Community Advisory Council, developed the new OCS0020 which informs CDC-only recipients that they qualify for child support services. It lists important services the IV-D program offers, including locating non-custodial parents (NCPs), collecting child support payments, and enforcing child support orders. The OCS0020 instructs the recipients to call OCS if they wish to start child support services.

Additionally, OCS has made minor updates to the:

- OCS1201/DHS-1201;
- DHS-842; and
- DHS-1151/MICASELTR.

OCS has removed the Legal Authorities information at the bottom of the forms because it is no longer needed and changed “MILOGIN” to “MiLOGIN” on the DHS-1151/MICASELTR.

#### **F. Public Communications**

MiLEAP and the Executive Office of the Governor are working cooperatively to issue a press release to announce the change in program requirements.

OCS reviewed its public-facing documents, pamphlets and websites to confirm that they do not inappropriately describe the receipt of CDC benefits as requiring cooperation with the child support program. OCS found that most outreach and educational materials refer to public assistance generally rather than identify specific programs. Any other materials that specifically address CDC cooperation will be updated as soon as possible.

#### **NECESSARY ACTION:**

Retain this IV-D Memorandum until further notice.

**REVIEW PARTICIPANTS:**

Case Management Work Improvement Team  
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**CC:**

None

**SUPPORTING REFERENCES:**

Federal  
45 CFR 264.30

State  
MCL 400.57e  
MCL 400.57g

**ATTACHMENTS:**

DHS-842:	<i>Child Support Response Form</i>
DHS-1151/MICASELTR:	<i>MiCase Letter</i>
DHS-1201:	<i>IV-D Child Support Services Application/Referral</i>
OCS0020:	<i>Notice of Eligibility – CDC Only</i>
OCS1201:	<i>IV-D Child Support Services Application/Referral</i>

**EPF/KRO**