Michigan IV-D Child Support Manual
Michigan Department of Health and Human Services

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1. Legal Background

1.1 Federal Law

Federal law requires IV-D programs to have procedures for reporting periodically to consumer reporting agencies (CRAs) the names of non-custodial parents (NCPs) with past-due support and the amount of the arrears.[1] A CRA is an organization that collects, stores, maintains and distributes consumer credit information.[2]

The reporting procedures must:

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[1] Section 466(a)(7) of the Social Security Act (SSA); 45 Code of Federal Regulations (CFR) 302.70(a)(7)
[2] CRAs can include but are not limited to National Credit Reporting Agencies (NCRAs) such as Experian, Equifax, TransUnion, Innovis, their affiliates, and mortgage reporting companies.

- Provide for notice to the NCP of the proposed action;
- Provide methods that permit the NCP to contest the accuracy of information;
- Comply with due process requirements of state law; and
- Ensure reports are issued only to entities that have furnished evidence that they are a CRA.[3]

The Fair Credit Reporting Act (FCRA) governs credit reporting.[4] The FCRA defines the responsibilities of CRAs, entities that supply information to credit reporting agencies, and persons who use the credit reporting data. It also covers the rights and responsibilities of consumers.

The Office of Child Support (OCS) must comply with the FCRA when using data provided by CRAs,[5] reporting data to the CRAs, and responding to disputes about the accuracy of the data submitted to the CRAs.

1.2   State Law

1.2.1   The Friend of the Court Act[6] requires the IV-D agency[7] to:

- Report to CRAs the arrearage amount for each NCP with a support arrearage of two or more months;[8]
- Make current support information available to CRAs upon request of the CRA or the NCP; and
- Determine what support information to report, and create policies and procedures for making information available to CRAs.

1.2.2   Michigan law[9] prohibits OCS from making information available to a CRA if it is determined that the CRA:

- Does not have sufficient capability to make appropriate use of the information; or
- Does not furnish satisfactory evidence that it is a CRA.

State law requires OCS to notify the NCP before reporting support information to the CRA.[10] The notice must advise the NCP of the right to a review based on a mistake of fact about the amount of the arrearage or the identity of the NCP.

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[3] Section 466(a)(7) of the Social Security Act
[4] Section 601 through Section 629 of the FCRA
[5] Ref: IV-D Memorandum 2016-039, *Revised Fair Credit Reporting Act (FCRA) Requirements and Requests to Third-Party Verification of Employment (VOE) Providers*.
[6] Michigan Compiled Laws (MCL) 552.512
[7] In Michigan, OCS is the IV-D agency. Ref: MCL 400.233. The State Court Administrative Office (SCAO) and the Friend of the Court (FOC) performed the responsibilities discussed in this subsection prior to a 2015 amendment to the Friend of the Court Act.
[8] Ref: Subsection 4 of this manual section for more information about calculating support arrearages.
[9] MCL 552.512(1)
[10] Ref: Subsection 5 of this manual section for more information about notice requirements.

The notice must also inform the NCP that (s)he can prevent being reported by paying the entire arrearage due. If the NCP objects to reporting based on a mistake of fact, the FOC must conduct a review.

2. Criteria for Submitting Non-Custodial Parents (NCPs) for Credit Reporting

NCPs with support arrearages that equal or exceed two months or more of the current support obligation meet the legal threshold for credit reporting.[11] Credit reporting is not a IV-D-only enforcement remedy;[12] however, MiCSES will not automatically select non-IV-D cases for credit reporting.[13]

2.1 NCPs Excluded From Credit Reporting

Certain conditions exclude the NCP from credit reporting. The Michigan Child Support Enforcement System (MiCSES) will not automatically select the following NCPs for reporting:

- NCPs who are exempted from enforcement by a court order;
- NCPs with a new or modified order that is less than two months old;[14]
- Deceased NCPs;
- NCPs with bankruptcy actions that began prior to October 17, 2005;[15]
- NCPs on a docket in which seven or more years have passed since all children associated with the docket became emancipated or graduated from high school, whichever occurred later;[16] and
- NCPs with insufficient demographic information in MiCSES.[17]

2.2 Manually Selecting NCPs

FOCs may manually select NCPs for credit reporting when:

- An NCP's support arrearages equal or exceed two months of the current support obligation, and the NCP does not fall within the excluded categories listed above;
- A court orders credit reporting; or

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[11] MCL 552.512(1)

[12] Ref: federal *Office of Child Support Enforcement (OCSE) Dear Colleague Letter (DCL)-90-14, Credit Reporting Agencies.*

[13] Ref: Subsection 2.2 of this manual section for information about manually selecting an NCP for reporting.

[14] This prevents an NCP from being immediately reported to a CRA when an initial order includes support arrearages. Ref: MCL 552.511(2).

[15] Ref: *Action Transmittal (AT) 2008-014, REVISED: The Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 (Bankruptcy Act).*

[16] While Michigan's statute of limitations on the debt is 10 years (MCL 600.5809[4]), CRAs do not report debts older than seven years. Ref: Section 605 of the FCRA.

[17] For a more detailed list of the types of cases that MiCSES will not select, reference the *MiCSES Customer Information Guide: Credit Reporting.*

- An NCP requests that the FOC report a favorable payment history to a CRA.[18]

3. Intergovernmental Cases

In intergovernmental cases, the responding state is responsible for reporting overdue support to CRAs.[19] MiCSES automatically reports support arrearages in intergovernmental cases when Michigan is the responding state.[20] MiCSES does not automatically report support arrearages when Michigan is the initiating state. This is true whether Michigan or another state issued the support order. MiCSES also prevents manual reporting when Michigan initiated the intergovernmental case.

If the FOC discovers, through the dispute process or other means, that another state(s) is also reporting the NCP, OCS recommends that the FOC contact the other reporting state(s) to determine whether the reported support arrearages are the same support debt.[21] If they are the same debt, the FOC worker should work with the other state(s) to determine which state will continue to file reports. If Michigan is the responding state, the other state insists on continuing to report, and the reports include all support arrearages (including those in which Michigan has an interest), the FOC worker may manually override MiCSES and discontinue reporting Michigan's support arrearages.[22]

If the FOC discovers or is informed by another state that the arrears reported to the CRAs are inaccurate, the FOC will work with the other state to resolve the inaccuracy whether Michigan is the responding state or the initiating state.

4. Calculating the Support Arrearage[23]

The IV-D agency is required to report NCPs whose total support arrearage equals or exceeds two months of their current support obligation. Support is defined[24] as payments to or for the benefit of a child or a spouse, including payments for medical, dental, or other health care expenses; childcare expenses; educational expenses; the mother's pregnancy and birth expenses; and surcharges.[25] MiCSES calculates

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[18] An NCP may request that the FOC initiate credit reporting because the NCP has a good payment history and wants creditors to be aware of it.

[19] 45 CFR 303.7(d)(6)(iii)

[20] Determine if Michigan is the initiating or responding state for an intergovernmental case by checking the *Intergov* indicator on the *Case Member Details* (CASE) screen.

[21] An NCP may contact the FOC about duplicate reporting, or OCS Central Operations may contact the FOC about a dispute submitted to the CRA. Ref: Subsection 9.2.4 of this manual section for more information on disputes.

[22] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for more information on manually overriding MiCSES.

[23] In the future, OCS plans to review the MiCSES process for calculating support arrearages to ensure that MiCSES is accurately calculating support arrearages using the appropriate debt types and accurately identifying NCPs for credit reporting.

[24] MCL 552.502a and MCL 552.602(ff)

[25] MCL 552.603a

the arrearage when automatically selecting NCPs for credit reporting.[26] FOC staff will manually calculate the arrears when manually selecting NCPs for credit reporting.

Note: The arrearage amount reported to the CRAs will not include Service Fees (SF) or Processing Fees (PF) obligation debt types.[27] These fees are not included in the two-month arrearage calculation.

4.1 Manually Calculating the Support Arrearage

When calculating the support arrearages to determine if the NCP qualifies for credit reporting, FOC staff will count all current support obligations in a IV-D case, including support for both the spouse and the children. If the NCP does not have a current support obligation, the FOC will calculate the two months of arrears using the NCP's most recent prior obligation (i.e., the current obligation on the last date that any current obligation existed). If the NCP does not have a current support obligation and the prior obligation cannot be determined, FOC staff will use $1,000 as a reasonable estimate of the two-month arrearage threshold.[28]

4.2 Support Arrearages on Lump-Sum Obligations

There are two ways a court may order a lump-sum obligation. The court may order that a fixed-amount obligation, such as the mother's birth expenses,[29] is not due immediately, but may be paid in monthly installments until the obligation is paid in full. In this instance, only past-due installments are considered when calculating the NCP's arrearage. (Ref: Example 1 below.)

Alternatively, the court may order that a lump-sum obligation (i.e., the entire obligation) is due immediately but can be paid in monthly installments. In this instance, enforcement remedies, including credit reporting, can continue against the entire obligation.[30] (Ref: Example 2 below.)

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[26] Ref: Exhibit 5.10E3, MiCSES Debt Types and Activities Table, for a list of debt types included in the arrearage calculation.
[27] Ref: Section 5.10, "Debt Types," of the *Michigan IV-D Child Support Manual* for more information about debt types.
[28] This estimate is from SCAO Administrative Memorandum 2009-04, *Providing Information to Credit Reporting Agencies*, which will be obsoleted in the future.
[29] Ref: Section 4.25, "Birth Expenses," of the *Michigan IV-D Child Support Manual* for more information.
[30] Ref: Subsection 2.5, "Lump-Sum Obligations," of Section 5.20, "Obligation – Entry, Modification and Adjustments," of the *Michigan IV-D Child Support Manual* for guidance on interpreting court orders with lump-sum obligations.

Example 1:

Birth expenses total obligation = $4,500

The court orders that the entire obligation is not due immediately, and the NCP must pay $100 per month toward that total obligation.

Support arrearages will accrue at the rate of $100 a month. The NCP will not be eligible for credit reporting until the support arrears equal or exceed $200. OCS will report the $200 of birth expense arrears and any other eligible support arrears, along with the current support balance, to the CRAs.

Example 2:

Birth expenses total obligation = $4,500

The court orders that the entire obligation is due immediately, and the NCP can make monthly installment payments of $100.

The support arrears are $4,500, and the NCP is eligible for credit reporting if (s)he meets other reporting eligibility requirements. OCS will report the $4,500 of birth expenses and any other eligible support arrears to the CRAs.

5. **Notice to NCP**

   When an NCP accumulates two months or more of support arrearages, MiCSES will send the *Notice of Rights and Responsibilities* (FEN003), which advises the NCP of possible enforcement activities, including credit reporting. Before reporting a support arrearage to the CRAs, the IV-D agency is required to notify the NCP of all of the following:[31]

   - That (s)he may be reported to the CRAs;
   - The amount of the support arrearage that will be reported to the CRAs (the amount on the FEN081 does not include certain fees);[32]
   - The NCP's right to a review, including when the request must be made and the grounds for objection; and
   - That the NCP may avoid being reported to the CRAs by paying the total amount of the support arrearage within 21 days of the date on the notice.

   OCS uses the *Notice of Intent to Report Child Support Debt to Credit Reporting Agencies* (FEN081) to notify the NCP that the IV-D agency intends to report the NCP to the CRAs. The FEN081 includes all of the information listed above.

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[31] MCL 552.512(2)
[32] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for more information on how this amount is calculated.

MiCSES automatically generates the FEN081 when an NCP is automatically or manually[33] selected for credit reporting due to support arrearages. The notice must be mailed or delivered to the NCP.[34] MiCSES does not generate a FEN081 when an NCP with no support arrearages requests that the FOC initiate credit reporting.

6. NCP Objections to Credit Reporting

The NCP may object to credit reporting before reporting begins. The NCP must request a review in writing or by completing the *Request for Administrative Review* included with the FEN081 and sending it to the address or fax number included on the notice. The NCP may not request a review by phone. The NCP's objection must be based on a mistake of fact about the amount of the arrearage or the identity of the NCP. If an NCP objects within 21 days of the date on the FEN081, the IV-D agency must not report the NCP to the CRAs[35] until:

- The time for the review[36] ends and the NCP has not provided evidence to support the objection; or
- The FOC has conducted a review and has determined the support information is correct.[37]

Note: The FOC must not consider an NCP to have an arrearage if the NCP can produce documentary evidence (e.g., pay stubs, wage statements, or other written documentation by the NCP's employer) that the support money withheld from the NCP's income equaled or exceeded the support payments required by the court order.[38]

After receiving an objection, the FOC must provide a review.[39] If an FOC receives an objection based on assertions other than a mistake of fact about the amount of arrears or the NCP's identity, FOC staff will inform the NCP that the objection does not meet the statutory requirements, and the FOC is not required to perform a review.

6.1 Arrears Payment Plans[40]

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[33] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for more information on how to manually report an NCP by starting a *Credit Bureau Reporting* (CRAR) activity chain.
[34] "Delivery" includes emailing the notice as permitted by Michigan Court Rule (MCR) 2.107(C)(4). Emails must comply with the security requirements in Section 1.10, "Confidentiality/Security," of the *Michigan IV-D Child Support Manual*.
[35] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for information on how to update the CRAR chain to prevent reporting until the review is complete.
[36] Ref: Subsection 7 of this manual section for more guidance on conducting reviews.
[37] MCL 552.512(3)
[38] MCL 552.607a
[39] Ref: Subsection 7 of this manual section for information on the review process.
[40] Ref: Section 6.42, "Payment Plans," of the *Michigan IV-D Child Support Manual* for more information about payment plans.

If an NCP who is paying arrears according to a payment plan under MCL 552.605e has an arrearage that exceeds two months or more of the current support obligation, the arrears must be reported. If an NCP objects solely because (s)he is currently on an approved payment plan, the FOC is not required to conduct a review because there has been no mistake of fact involving either the NCP's identity or the arrearage amount.

6.2 Administrative Arrears Management Programs (AMPs)[41]

When an NCP participates in an administrative Arrears Management Program (AMP), a portion of the NCP's arrears may be discharged.[42] If an NCP objects to credit reporting solely because (s)he is participating in an AMP, the FOC is not required to conduct a review. Until the arrears are discharged, OCS must report the NCP to the CRAs if the arrears threshold is met.

7. FOC Review

FOC staff must conduct a review if the NCP objects in writing about a mistake of fact concerning the NCP's identity or the amount of the arrearage. FOC staff will notify the NCP of the review results in writing.

7.1 Timeframe for Conducting the Review

Michigan law does not give a timeframe within which FOCs must conduct a review for credit reporting. However, FOCs should complete the review within 21 days of receiving the NCP's request for a review. If FOC staff do not document the objection on the *Enforcement Processor* (ENFP) screen in MiCSES,[43] the CRAR activity chain will remain open but will not progress without manual intervention.

If FOC staff need additional time to conduct the review, they must document the objection by updating the CRAR activity chain appropriately.[44] FOC staff may provide the NCP with an NCP Financial Detail Report (NCPD),[45] which includes detailed account information on the NCP's obligations and payments. This will give the NCP an opportunity to evaluate the account information before FOC staff start the review.

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[41] Ref: Section 6.51, "Arrears Management," of the *Michigan IV-D Child Support Manual* for more information on arrears management.

[42] "Discharge" refers to the removal of an NCP's debt without a corresponding payment.

[43] Ref: Exhibit 5.10E3, MiCSES Debt Types and Activities Table.

[44] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for more information on updating the CRAR activity chain.

[45] Ref: *MiCSES Report Description: NCP Financial Detail Report (NCPD)* for more information on the data included in the NCPD, and *MiCSES Quick Reference Guide: ACTS - Generate a Non-Custodial Parent Financial Detail (NCPD) or Custodial Party (CPFD) Report* for more information about generating an NCPD.

Michigan law does not specify the type of review the FOC must provide to the NCP. The FOC may decide whether the review will be:

- Administrative – Conducted by an FOC staff member;
- Quasi-judicial – Conducted by a referee in accordance with the requirements of MCR 3.215; or
- Judicial – Conducted by a judge.

7.2 Review Results

7.2.1 Communicating the Review Results

After the FOC completes the review, FOC staff must mail or deliver[46] notice of the review results to the NCP. FOC staff may notify the NCP using their own form or letter, or *a Determination on Arrearage* (FOC 70 or FEN074) form.

A. Decision to Report to CRAs

If the review affirms the decision to report to the CRAs, FOC staff may include in their notification that the NCP can avoid being reported by paying the total amount of the arrearage.[47] If FOC staff include this in the notification, they should allow the NCP at least five business days to pay the arrearage before reporting begins. FOC staff should also update the CRAR chain to ensure that reporting does not begin before the five days elapse.[48]

B. Decision Not to Report to CRAs

If the FOC determines, after conducting the review, that the NCP should not be reported, the FOC will:

- Correct any inaccurate information in MiCSES; and
- Update the CRAR activity chain to prevent the NCP from being reported.[49]

7.2.2 NCP Objections to Review Results

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[46] "Delivery" includes emailing the notice as permitted by MCR 2.107(C)(4). Emails must comply with the security requirements in Section 1.10 of the *Michigan IV-D Child Support Manual.*
[47] The FOC may include this notification in paragraph 9 on the FOC 70 or paragraph 10 on the FEN074, or by addressing the issue in a letter accompanying the FOC 70 or FEN074.
[48] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for information on updating the CRAR chain with the appropriate reason codes.
[49] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for more information on updating the CRAR activity chain.

If the NCP objects to the outcome of the review, the FOC is not required to provide further opportunity for review. However, if the FOC provides additional reviews before a judge or referee for other administrative reviews (e.g., tax refund offset), OCS recommends that the same opportunity be provided for administrative credit reporting reviews. If the FOC permits the NCP to request a review hearing and a hearing is scheduled, the FOC may use the *Notice of Review on Arrearage (Consumer Reporting Agency)* (FOC 69) form to notify the NCP at the NCP's last-known mailing address.[50] The FOC may communicate the results of the review hearing to the NCP in a letter or with the *Order for Determination on Arrearage* (FEN084) form.

If the FOC denies the request for a hearing, the FOC must notify the NCP in writing and advise that (s)he may file a motion to request a review hearing.

8. Reporting to Consumer Reporting Agencies (CRAs)

Michigan reports support arrears[51] to two CRAs: Innovis and Experian. Both share data with other CRAs. Once an NCP is automatically or manually selected for credit reporting, MiCSES automatically sends reports monthly through a batch process.[52] After reporting begins, it will continue until the support arrearages are paid in full.[53] When the NCP pays the arrears in full or all of the arrears are discharged, MiCSES will automatically report the zero arrears balance to the CRAs and stop reporting the NCP to the CRAs on a monthly basis. MiCSES will not request that the CRAs close the NCP's account; the account will remain open, showing the monthly payment due at the time reporting ended.[54] The CRA account will remain open for seven years.[55]

If an NCP requests credit reporting, it will continue until the NCP requests that the FOC stop reporting, unless the NCP has accrued an arrearage that meets the threshold for credit reporting. If the NCP has not requested that OCS stop credit reporting, MiCSES will continue to report the NCP and change the account status from current to delinquent if applicable. In addition, reporting will end if the case becomes an "initiating" intergovernmental case[56] or when the NCP disputes the credit reporting after it has begun and the FOC determines that the dispute is valid.[57]

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[50] MCR 2.107 permits notice by mail or delivery, which includes email. Emails must comply with the security requirements in Section 1.10 of the *Michigan IV-D Child Support Manual*.
[51] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for more information about which debt types are included in the arrears calculation.
[52] Ref: the *MiCSES Customer Information Guide: Credit Bureau Referral (BATCH_CBOR) Process*.
[53] MiCSES will automatically report for only seven years after the age of emancipation or graduation from high school, whichever is later.
[54] Help Desk ticket HD280954 was entered to address this issue.
[55] Section 605B of the FCRA
[56] Ref: Subsection 3 of this manual section for information on intergovernmental cases and credit reporting.
[57] Ref: Subsection 9.1 of this manual section for information on disputes submitted to the FOC.

The monthly batch submits new and updated referrals[58] to the CRAs. It is important for FOC staff to allow the automated process to close the CRAR activity chain when the arrears are paid in full. When FOC staff manually close the CRAR activity chain rather than allow MiCSES to complete its automated process, the NCP's zero arrears balance may never be reported to the CRAs.

9. Credit Reporting Disputes

Disputes occur after credit reporting begins and an NCP questions the accuracy of the information that the IV-D agency has reported to the CRA. The right to submit a dispute after credit reporting has begun is separate from the NCP's right under state law to object to reporting before it begins. An NCP has the option of contacting the FOC or the CRA about the dispute. The NCP is responsible for providing all of the following about the dispute:

- The information that is being disputed;
- An explanation of the basis for the dispute; and
- Supporting documentation to substantiate the basis of the dispute.[59]

9.1 Disputes Submitted to the FOC

When an NCP submits a dispute to the FOC, the IV-D agency must stop reporting the disputed information **unless** the IV-D agency notifies the CRA that the information is disputed.[60] The FOC notifies the CRA by updating the CRAR activity chain. MiCSES communicates the dispute to the CRAs via the batch process.[61] An FOC is only required to review a dispute that is based upon a mistake of fact concerning the amount of the arrearage or the NCP's identity.[62]

9.1.1 Frivolous or Irrelevant Disputes

The FOC is required to conduct a reasonable investigation of disputes that are not frivolous or irrelevant.[63] A dispute is considered frivolous or irrelevant when:

- The person submitting the dispute does not provide sufficient information to investigate the dispute; or
- The dispute is substantially the same as a previously investigated dispute made to the FOC or the CRA.[64]

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[58] A "referral" is NCP data that is submitted to the CRAs.
[59] Section 623(a)(8)(D) of the FCRA
[60] Section 623(a)(3) of the FCRA
[61] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for instructions on how to document a dispute in MiCSES.
[62] These are the same criteria established by MCL 552.512 as the only grounds on which an NCP may dispute the arrearage data that is being reported.
[63] Section 623(a)(8)(F) of the FCRA
[64] 12 CFR 1022.43(f)

FOC staff must notify the NCP within five days of making their determination that a dispute is frivolous or irrelevant. The notice must include the reasons for the determination and inform the NCP of any information required to investigate the dispute further. FOC staff may send the notice by mail or any other communication method that the NCP has authorized.[65]

9.1.2 Valid Disputes

A. Overview

If the FOC determines that the dispute is not frivolous or irrelevant, FOC staff must do all of the following:

- Investigate the dispute;[66]
- Review all relevant information provided by the NCP; and
- Complete the investigation and report the results of the investigation to the NCP within 30 days of receiving the dispute.[67]

B. Investigation Results

The FOC will notify the NCP of the results of the investigation.[68] OCS recommends that the FOC send a written notice to the NCP. If the information provided to the CRAs is accurate, the FOC will update the CRAR chain with the appropriate code.[69]

If the investigation reveals that the information provided to the CRAs is inaccurate or that the NCP should not have been reported to the CRAs, the FOC must notify the CRA within 14 days of discovering the error.[70] The FOC must appropriately update MiCSES to ensure that the CRAs have been informed by progressing the CRAR activity chain on the ENFP screen.[71] If there is a mistake of fact about the amount of the arrearage, the FOC must also update the *Obligation Arrears Adjustment* (OBAA) screen. MiCSES runs a daily batch to inform the CRAs when the FOC enters in MiCSES that there is a

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[65] Section 623(a)(8)(F)(ii) of the FCRA

[66] The FOC is not required to investigate a dispute that is submitted by or prepared for the NCP by a credit repair organization. Credit repair organizations are entities that sell services to improve a consumer's credit history. Ref: 12 CFR 1022.43.

[67] Section 623(b)(1)(B) of the FCRA; 12 CFR 1022.43

[68] FOC staff may notify the NCP using their own form or letter – an FOC 70 or FEN074 form.

[69] Ref: the *MiCSES Customer Information Guide: CRAR – Credit Reporting Activity Chain* for information on credit reporting activity codes.

[70] MCL 552.512

[71] Ref: the *MiCSES Customer Information Guide: Credit Reporting* for information on how to update MiCSES.

mistake of fact regarding the NCP's identity or the amount of the arrearage.

Other possible investigation results and FOC actions are discussed below.

1. Claims That the Consumer[72] Does Not Have a Child Support Case in Michigan

   A consumer may claim that (s)he does not have a child support case in Michigan. If a Michigan child support account number appears on the consumer's credit report, but the consumer claims not to have a Michigan child support case, FOC staff should verify the consumer's identity in MiCSES using his/her name, date of birth, and Social Security number (SSN). The FOC can use the CRA account number to determine the county and docket number. For Michigan child support accounts, this number is assigned by MiCSES and is comprised of the 2-digit county number, followed by the 10-digit docket number, followed by the 8-digit NCP member number, followed by the 10-digit Order ID number.[73]

2. Consumer Identifying Data Matches an NCP's Identifying Data

   The FOC worker will first determine if the consumer's identifying information on the credit report matches an NCP's identifying information in MiCSES by reviewing the MiCSES screens described in Subsection 9.2.4(B)(1) of this manual section to confirm demographic information.[74] If the identifying information matches the NCP's data in MiCSES for the docket that OCS reported to the CRAs, the FOC worker will tell the consumer to submit the dispute in writing based on a mistake of fact about the NCP's identity or the amount of child support debt, along with supporting documentation.

   If some, but not all, of the consumer's identifying information matches the NCP's identifying information, the FOC worker will determine whether the consumer is responsible for the child support account. If the FOC worker determines that the consumer is not responsible for the account but OCS reported the consumer in error, the FOC worker must correct the NCP's identifying

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[72] A "consumer" is a person disputing credit reporting through a CRA. For Michigan child support reporting purposes, the consumer is an NCP. However, a CRA may inappropriately associate a reported Michigan child support account to an individual who is not an NCP.
[73] The Order ID number is an internal MiCSES identifier that is not viewable on any screen.
[74] Subsection 9.2.4 of this manual section describes the research steps OCS Central Operations takes to verify data provided by the CRAs.

information in MiCSES and document the dispute and its resolution on the *Notes Processor* (NOTE) screen. MiCSES will send the corrected information in the next monthly batch file after the information is updated.

The FOC will advise the consumer that (s)he may need to file a dispute with the CRA to ensure that the child support account is no longer listed on his/her credit report. If the consumer submits a dispute with the CRA, OCS will receive an Automated Consumer Dispute Verification (ACDV)[75] via the Online Solution for Complete and Accurate Reporting (e-OSCAR).[76] In response to the ACDV, OCS Central Operations[77] will work with the FOC to inform the CRA that the consumer who disputes the account has a different identity than the NCP reported in the updated account information.

3. Consumer's Identifying Information Does Not Match NCP's Identifying Information

If the consumer's identifying information on the credit report does not match the NCP's identifying information in MiCSES, the FOC will explain to the consumer that although the Michigan IV-D agency reported the child support account number to the CRA, Michigan did not submit the consumer's name or other identifying information to the CRA. The FOC will do all of the following:

- Inform the consumer that the CRA may have made an error;
- Explain to the consumer how to submit a dispute to the CRA;[78]
- Instruct the consumer to tell the CRA that (s)he has contacted the FOC and that the FOC submitted the child support account information with a different identity for the consumer; and
- Create a docket-level note in MiCSES that matches the account information. The note will document all actions taken in response to the dispute.

If the consumer submits a dispute to the CRAs, OCS will receive notification of the dispute from the CRA via e-OSCAR. OCS will work with the FOC to respond to the dispute and explain that the consumer identified by the CRA is not the NCP reported by OCS.[79]

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[75] Ref: Subsection 9.2 of this manual section for information about ACDVs.
[76] Ref: Subsection 9.2 of this manual section for information on e-OSCAR.
[77] Ref: Subsection 9.2.4 of this manual section for more information about OCS Central Operations' role in resolving disputes.
[78] FOC staff will contact OCS Central Operations for CRA contact information.
[79] Ref: the job aid *e-OSCAR: Responding to an ACDV for Michigan Child Support Accounts*.

9.2 Disputes Submitted to the CRA

An NCP has the option of disputing the child support information that appears on his/her credit report by contacting the CRA. Disputes submitted to the CRAs are communicated to OCS through e-OSCAR. OCS responds to the CRAs about the disputes through e-OSCAR. e-OSCAR is an online computer system that allows data furnishers[80] and CRAs to communicate with each other quickly and securely. CRAs use ACDVs and Automated Universal Data forms (AUDs) to communicate to OCS through e-OSCAR.

An ACDV is an electronic request from a CRA to OCS to verify, update or delete account information on a consumer's credit report. An AUD is an electronic method used to update CRAs, through e-OSCAR, about an error, correction, or deletion to a previously reported account. Generally, OCS does not need to use AUDs because MiCSES reports these types of updates in a daily batch.

e-OSCAR also allows CRAs to inform OCS of any modifications the CRAs have made to the consumer's account. These modifications include deletions as well as changes made due to an ACDV response or non-response, a consumer's claim of identity theft, or an internal CRA process. e-OSCAR sends ACDVs and notifications from all of the CRAs with which OCS has accounts. OCS reports child support debt to Experian and Innovis; therefore, the majority of ACDVs received will be from one of these CRAs. If OCS begins reporting to additional CRAs, those CRAs will also send ACDVs through e-OSCAR. However, OCS may still receive ACDVs from CRAs or mortgage lenders with whom OCS does not have accounts.

e-OSCAR and MiCSES do not communicate directly with each other. MiCSES communicates with the CRAs Innovis and Experian. Therefore, it is important that OCS Central Operations and FOC staff perform the necessary steps on e-OSCAR as well as in the MiCSES CRAR activity chain when it is determined that OCS should discontinue reporting an NCP. MiCSES will communicate with the CRA to ensure that the reporting ends.

OCS updates the CRAs through monthly and daily MiCSES batches.[81] The daily batch informs the CRAs about mistakes of fact concerning an NCP's identity or arrearage, or if an NCP is excluded from credit reporting. However, if the CRAR activity chain is closed before MiCSES can select an NCP to include in the daily or monthly batch, MiCSES will not send this information to the CRAs.[82]

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[80] "Data furnishers" are entities or persons who submit data to the CRAs. OCS is a data furnisher that submits child support data.

[81] For information on the daily update file sent to CRAs, reference the *MiCSES Customer Information Guide: Credit Referral Updates and Submittal (BATCH_CBTW) Process*.

[82] In this situation, the FOC will need to send an AUD to update the CRA.

9.2.1 Dispute Process

A. NCP and CRA Actions

An NCP may contact a CRA to dispute the accuracy of child support information reported to the CRA. The CRA must respond to a dispute regarding the completeness or accuracy of data included in a consumer report within 30 days of receiving the dispute. During that period, the CRA must conduct an investigation of the dispute to determine the accuracy of the information. The CRA may extend that deadline for not more than 15 days.[83]

When an NCP submits a dispute about child support information to the CRA, the CRA must notify OCS within five business days of receiving the dispute and provide all the relevant information from the NCP.[84] e-OSCAR allows CRAs to easily comply with these timelines by allowing instant requests for debt verification via the Internet. When an NCP disputes the reporting of a Michigan child support debt directly to the CRA, e-OSCAR immediately sends an ACDV to notify OCS. OCS responds by verifying or updating information on the ACDV.

B. OCS Actions

Federal law requires that OCS do all of the following upon receiving notification of a dispute from the CRA:[85]

1. Investigate the dispute;[86]
2. Review all relevant information, including NCP documentation, provided by the CRA and respond to the CRA on or before the due date; and
3. Report the results of the investigation to the CRA.

    a. If the investigation reveals that the NCP information provided to the CRA is incomplete or inaccurate, OCS will report the results to all CRAs that were furnished the information.[87]
    b. If information reported to the CRAs is disputed by an NCP and is found to be inaccurate or incomplete, or it cannot be verified after any reinvestigation, OCS must promptly:

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[83] Section 611(a)(1)(B) of the FCRA
[84] Section 611(a)(2) of the FCRA. As of 2013, e-OSCAR notifications also provide electronic access to any documentation the NCP has submitted to the CRA along with the dispute.
[85] Section 623(b) of the FCRA
[86] The FOC is not required to investigate a dispute that is submitted by the NCP through a CRA or prepared for the NCP by a credit repair organization. Ref: 12 CFR 1022.43.
[87] e-OSCAR will report the results of the investigation to all CRAs.

1) Modify the information;
2) Delete the information; or
3) Permanently block the reporting of the information.

9.2.2 Centralized e-OSCAR Dispute Processing

OCS Central Operations conducted a three-month pilot project during 2016 to evaluate the effectiveness of centrally processing e-OSCAR disputes. Wayne and Muskegon counties participated in the pilot. OCS Central Operations will begin processing the e-OSCAR disputes for the entire state on March 1, 2017. OCS Central Operations will review each dispute for a mistake of fact concerning the arrearage amount or the NCP's identity, and determine the accuracy of the data reported by the Response Due Date.

OCS Central Operations must respond to an ACDV by the Response Due Date. e-OSCAR provides the required Response Due Date for each ACDV and monitors for ACDV responses. If OCS Central Operations has not accessed a queue within eight calendar days, e-OSCAR will submit a reminder notification to the Queue Manager[88] for that queue. If the queue is not accessed for 12 calendar days, e-OSCAR will send a reminder notice to the System Administrator and Queue Manager. If OCS Central Operations does not respond to the ACDV by the Response Due Date, the CRA will delete the account referenced in the ACDV from its files.

OCS Central Operations will monitor its performance by running monthly Report Card reports in e-OSCAR. Training on how to create this report is available on the e-OSCAR website at https://e-oscar-web.net/.

9.2.3 e-OSCAR User Roles and Training Resources

A. e-OSCAR User Roles

There are three e-OSCAR user roles: ACDV Responder, Queue Manager, and System Administrator. These roles are assigned to designated OCS Central Operations IV-D staff. OCS Central Operations staff will follow the policy and instruction in Section 1.10 of the *Michigan IV-D Child Support Manual* for requesting, changing or deleting access to e-OSCAR.

1. ACDV Responder

The ACDV Responder accesses and responds to ACDVs received from the CRAs. ACDV Responders review ACDVs, verify

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[88] Ref: Subsection 9.2.3 of this manual section for a discussion of e-OSCAR roles.

member and case information in MiCSES, and respond to the CRA as required. ACDV Responders must:

- Access e-OSCAR daily to determine the status of new and/or existing ACDVs; and
- Respond to all ACDVs by the Response Due Date indicated on e-OSCAR.

2. Queue Manager

Queue Managers ensure that the ACDV Responder reviews ACDVs and responds as necessary when an e-OSCAR notification is received indicating that an ACDV(s) has not been accessed within eight calendar days. Queue Managers also review Block and Dispute Response (DR) notifications at least once a week.[89]

3. System Administrator

The System Administrator can assign and reset usernames, passwords, and queues.

B. e-OSCAR Training Resources

There are several e-OSCAR training resources available online. In 2016, e-OSCAR launched a learning management system that offers users interactive, on-demand training courses and allows users to manage enrollment, launch online courses, and access training materials.[90]

9.2.4 OCS Central Operations Responsibilities

A. Processing e-OSCAR Disputes[91]

OCS Central Operations is primarily responsible for processing the e-OSCAR disputes. More than 90 percent of the disputes OCS receives do not require any changes in MiCSES. OCS Central Operations uses MiCSES to verify that the information OCS submitted to the CRA is accurate. OCS Central Operations staff will contact the FOC to assist in resolving the dispute when OCS Central Operations

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[89] Block and DR notifications will be accessible to Queue Managers for 120 days after the notification is entered in e-OSCAR. Ref: the job aid *e-OSCAR: Viewing a Block or DR Notification Report Associated to Michigan Child Support Accounts* for more information on responding to Block and DR notifications.
[90] Ref: http://www.e-oscar.org/ for information on e-OSCAR training and the learning management system.
[91] The process for responding to ACDVs is described in the job aid *e-OSCAR: Responding to an ACDV for Michigan Child Support Accounts.*

determines that the information reported to the CRA is not accurate or cannot be verified. Examples of circumstances when OCS Central Operations should contact the FOC include, but are not limited to the following:

- When research indicates that credit reporting should be terminated;
- When the NCP submits documentation with the dispute that there are payment discrepancies or inaccuracies that need to be resolved in MiCSES;
- When the dispute involves a claim of duplicate reporting;[92]
- When dispute resolution requires updates to MiCSES or the CRAR activity chain;
- When OCS Central Operations updates a mailing address on MiCSES; and
- When the name or SSN on the ACDV does not exactly match the name in MiCSES.

OCS Central Operations must enter a docket-level note for all actions taken to respond to an e-OSCAR dispute (e.g., the date the dispute was received, the dispute resolution, and any communications with the FOC).

B. Research

OCS Central Operations is responsible for researching ACDVs and responding to them using the appropriate codes on or before the Response Due Date provided in e-OSCAR. OCS Central Operations will research all of the following topics in the order in which they appear, unless the dispute is resolved before all of the research steps are completed.

1. Demographics

OCS Central Operations must verify that the demographic information provided in the ACDV is accurate, including the SSN, date of birth, and address. OCS Central Operations will use the *Case Search List* (CLST) screen to verify the SSN. If the SSN is not found, OCS Central Operations will research the *Member SSN History* (MSSN) screen. OCS Central Operations staff will verify the date of birth and address by checking the *Member Demographics* (DEMO) and the *Member Address History* (AHIS) screens.

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[92] Duplicate reporting occurs when more than one state is reporting the same child support debt.

OCS Central Operations may update the mailing address on MiCSES with address information provided on the ACDV.[93] OCS Central Operations will follow the process for updating and verifying mailing addresses described in Section 3.15, "Addresses," of the *Michigan IV-D Child Support Manual*. If OCS Central Operations staff update a mailing address, they must notify the FOC credit reporting contact that the address has been updated.

If the ACDV contains documentation from the NCP[94] with address information that does not match the address provided on the ACDV, OCS Central Operations must not update the address in MiCSES. OCS Central Operations will notify the FOC about the mismatched addresses, and the FOC will determine whether to update the address in MiCSES.

If there is a discrepancy between the name provided on the ACDV and the name in MiCSES, OCS Central Operations will not make any updates in MiCSES and will notify the FOC's credit reporting contact.[95] The FOC will determine whether to update the name in MiCSES.

2. Credit Reporting History

   OCS Central Operations staff will review the NCP's credit reporting history in MiCSES and verify the most recent reporting date, arrearage amount on that date, and the credit reporting account status. This information is documented on the *Credit Agency Referral* (CBOR) screen.

   OCS Central Operations staff will determine whether the NCP has been excluded from credit reporting by researching the CRAR activity chain on the ENFP screen or the CBOR screen. If the NCP has been excluded from credit reporting, no further research is required. OCS Central Operations will contact the FOC's credit reporting contact to verify that the NCP has been excluded from credit reporting, enter a docket-level note, and submit the appropriate code[96] through e-OSCAR.

3. Arrears and Payment History

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[93] The CRA provides the address on the ACDV. The CRA pulls it from the consumer's credit application.

[94] Images of documentation provided by the NCP are sometimes included in the ACDV.

[95] Ref: Subsection 9.2.6 of this manual section for information on the FOC's responsibilities.

[96] Ref: the job aid, *e-OSCAR: Responding to an ACDV for Michigan Child Support Accounts,* for more information on response codes and using e-OSCAR.

If the NCP has not been excluded from credit reporting, OCS Central Operations will research the NCP's arrears and payment information on the *Support Order Summary* (SLOG) screen and the *Receipt Status History* (RHIS) screen. OCS will verify payments and the arrears balance.

4. Notes

OCS Central Operations will review the NOTE screen for notes relating to credit reporting that may affect the dispute's resolution.

9.2.5 Block Notifications and Dispute Response (DR) Notifications

A CRA sends a Block notification or DR notification via e-OSCAR when it has modified or permanently deleted an account from its system. If the CRA permanently deletes a child support account number from its system, OCS must not send any information with that account number to the CRA. CRAs send Block and DR notifications to the ACDV Responder.

A. Block Notifications

A Block notification informs OCS Central Operations that the CRA has blocked an account number from processing within its system because of consumer identify theft. OCS Central Operations will refer all Block notifications to the FOC.[97]

B. DR Notifications

A DR notification notifies OCS Central Operations that account information has been modified or the CRA has deleted the account number due to an ACDV response, non-response, or CRA internal policy. OCS Central Operations will print and review the DR notifications report each week. OCS Central Operations will notify each FOC about DR notifications for accounts in its county that have been deleted due to an ACDV response or non-response. The FOC is not required to take any action in response to these DR notifications.

OCS will notify the FOC credit reporting contact when an account is deleted due to an internal CRA policy. FOC staff will research the reason for the deletion and notify OCS Central Operations if the FOC determines that the reason for deletion is not valid. If the deletion is not valid, OCS Central Operations will request that the CRA reinsert the account. A request for reinsertion may be appropriate when the

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[97] Ref: Subsection 9.2.6 of this manual section for information on FOC responsibilities regarding Block notifications.

account was deleted due to identity theft, but the FOC has verified that the NCP is responsible for the support arrearage.

9.2.6 FOC Responsibilities

The FOC is responsible for ensuring local staff perform all actions pertaining to the initial submission of an NCP for credit reporting and the exclusion of NCPs who have been reported in error from continued credit reporting. The FOC will also:

- Respond to NCP objections before credit reporting begins;
- Respond to NCP disputes submitted directly to the FOC after credit reporting begins;
- Respond to inquiries about ACDVs, update MiCSES when necessary, and perform additional research when OCS Central Operations requests assistance; and
- Respond within two business days to inquiries about e-OSCAR disputes from OCS Central Operations.[98]

A. Block Notifications and DR Notifications

For Block Notifications and for DR notifications of account deletions referred from OCS Central Operations, FOC staff will research the reason for the block or the deletion. If FOC staff can confirm that the reason for block or the deletion is accurate, they must exclude[99] the NCP/docket from credit reporting on MiCSES and write a case note that indicates the reason for the exclusion. If research reveals that the account was erroneously blocked or deleted, FOC staff will work with OCS Central Operations to request that the CRA reinsert the account.

B. Maintain Credit Reporting Contact Information

Each FOC office will identify at least one credit reporting contact who will be primarily responsible for responding to OCS Central Operations' inquiries about ACDVs, Block notifications, and DR notifications. The name and contact information for each FOC credit reporting contact person is published on mi-support's Partner Contact Information page. An FOC office may choose to have two credit reporting contacts.

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[98] If OCS Central Operations does not get a response from the credit reporting contact identified on mi-support within two business days, OCS Central Operations will contact the main FOC office for assistance.

[99] Ref: *MiCSES Customer Information Guide: Credit Reporting* for more information on how to manually exclude an NCP from credit reporting.

All FOC offices should keep their credit reporting contact information current. FOC staff may update their information on mi-support's Partner Contact Information page by clicking "Offer Feedback" in the upper-right side of the mi-support web page, typing in the requested changes, and clicking the *Submit feedback* button.[100]

C. Contacting OCS Central Operations

FOC staff can email OCS Central Operations with questions about e-OSCAR disputes at mdhhs-ocs-ceu@michigan.gov.[101] The subject line of the email should state that the email concerns e-OSCAR.

9.3 ACDV Delete Response

9.3.1 Deleting an Account

OCS Central Operations performs the manual steps on e-OSCAR to request that a CRA delete an account. However, the decision to delete the account is the responsibility of the FOC. OCS Central Operations and the FOC must exercise caution when asking the CRA to "delete" an account. When the CRA deletes an account, the account is permanently deleted from the CRA's records and the CRA will no longer accept any other information about that account number. The only valid reason for sending a "delete" response to an ACDV is if the docket associated to the account has no arrears, and current support is not due and never will be due.

Therefore, OCS Central Operations must never ask the CRA to delete an account for any of the following reasons:

- The consumer who filed the dispute is not the NCP;
- The consumer/NCP was incorrectly submitted to the CRA for credit reporting;
- The NCP no longer owes arrears, but the case is still charging; or
- The consumer's/NCP's information on the ACDV does not match the information on MiCSES.

When information on the ACDV and/or MiCSES is incorrect or does not match, OCS Central Operations staff must modify the information on the ACDV and/or in MiCSES (e.g., name, SSN, date of birth [DOB], current balance, etc.).

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[100] If an FOC office is adding a second credit reporting contact, the request should clearly state that the contact is an addition – not a replacement.
[101] Ref: Section 1.10 of the *Michigan IV-D Child Support Manual* for information on sending confidential information in email.

Example 3:

The ACDV on e-OSCAR lists the following information about the consumer:

Last Name: Smith   SSN: 555-77-4444
First Name: Jonathan   DOB: 01/16/1955
Middle Name: D.

On MiCSES, the docket number that is attached to the account number for the consumer on the e-OSCAR ACDV has the following information about the NCP:

Last Name: Smith   SSN: 333-55-4444
First Name: Johnny   DOB: 04/26/1974
Middle Name: Dwight

OCS Central Operations staff must respond to the ACDV by indicating that the first name, middle name, SSN and DOB are different and by providing the information exactly as it appears in MiCSES. OCS Central Operations must submit the ACDV response code that indicates the account information that OCS reported was accurate as of the date reported.[102]

OCS Central Operations staff must not respond with the response code of "03: Delete account." In this situation, it appears that the CRA associated Johnny Dwight Smith's Michigan child support account to another person. If OCS Central Operations sends a request to delete, the CRA will no longer accept any account information for the real Johnny Dwight Smith.

Note: This example provides only brief information about an e-OSCAR ACDV response. For further assistance, reference e-OSCAR and/or OCS training documentation.[103]

9.3.2 Excluding NCPs/Dockets From Credit Reporting

If OCS Central Operations staff determine that MiCSES should not have submitted the member for credit reporting, they must contact the FOC to investigate. If FOC staff determine that the NCP was reported in error, they must exclude the NCP/docket from credit reporting in MiCSES[104] rather than request though e-OSCAR that the CRA delete the account.

When FOC staff exclude the NCP/docket from credit reporting on the MiCSES ENFP screen, MiCSES sends the CRAs a request to delete in the daily update file. When MiCSES sends a request to delete, the CRA will delete the entire history tied to the associated account number;

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[102] The CRA will have to determine whether it needs to make changes to its records.
[103] Ref: the job aid, *e-OSCAR: Responding to an ACDV for Michigan Child Support Accounts,* for more information on response codes and using e-OSCAR.
[104] Ref: *MiCSES Customer Information Guide: Credit Reporting* for information on how to exclude an NCP from credit reporting in MiCSES.

however, if the NCP/docket is reported to the CRA in the future, the CRA will accept and process information with that account number.

Example 4:

The ACDV on e-OSCAR lists the following information about a consumer and her account as of June 27, 2016:

Last Name: Brown	SSN: 111-33-5555
First Name: Samantha	DOB: 07/10/1978
Middle Name: Ann	Current Balance: $5,500

On MiCSES, the OCS Central Operations worker enters the docket number that is attached to the account number on the e-OSCAR ACDV. He finds that the information on MiCSES matches the account information provided by e-OSCAR as of June 28, 2016.

The OCS Central Operations worker also notices that the case is currently in review because of a change in custody. The case notes clearly indicate that the judge issued an order that excluded this case from any enforcement until the review is complete; however, FOC staff never excluded the case from credit reporting.

Because all of the information on the ACDV matches the consumer and account information on MiCSES as of the date of the account information, the OCS Central Operations worker must submit the ACDV with the response code that represents the account information accurate as of the date reported. However, on MiCSES, FOC staff must exclude the NCP/docket from credit reporting.

MiCSES will send a delete request to the CRAs in the daily update file. Because the CRA will not permanently delete the child support account, credit reporting can resume for this NCP/docket in the future if necessary.

Note: This example provides only brief information about an e-OSCAR ACDV response. For further assistance, reference e-OSCAR and/or OCS training documentation.

SUPPORTING REFERENCES: Federal
15 USC 1681 to 1681x
15 USC 1681c(a)(2)
15 USC 1681i(a)(1)(B)
15 USC 1681i(a)(2)
15 USC 1681s-2(a)(3)
15 USC 1681s-2(a)(8)(D)
15 USC 1681s-2(a)(8)(F)
15 USC 1681s-2(b)
42 USC 666(a)(7)

12 CFR 1022.43
12 CFR 1022.43(f)
45 CFR 302.70(a)(7)
45 CFR 303.7(d)(6)(iii)

OCSE DCL-90-14

State
MCL 400.233
MCL 552.502a
MCL 552.511(2)
MCL 552.512
MCL 552.512(1), (2), and (3)
MCL 552.602(ff)
MCL 552.603a
MCL 552.603d
MCL 552.605e
MCL 552.607a
MCL 600.5809(4)

MCR 2.107
MCR 2.107(C)(4)
MCR 3.203
MCR 3.215

SCAO Administrative Memorandum 2009-04

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