

 <p>Children's Services Administration</p> <p>Communication Issuance</p> <p>23 - 066</p>	Subject/Title	Changes to Child Support Collections
	Type	<input checked="" type="checkbox"/> Informational Memorandum <input type="checkbox"/> Program Instruction <input type="checkbox"/> Policy Guide
	Issuance Date	7/17/2023
	Obsolete Date	
	Contact Name	Federal Compliance Division
	Email	MDHHS-federalcompliance@mdhhs.state.mi.us
	Phone	N/A
Due Date	N/A	
Due to	N/A	
<i>Distribution</i>	<input checked="" type="checkbox"/> CSA Central Office Managers/Staff <input checked="" type="checkbox"/> MDHHS BSC and County Directors <input checked="" type="checkbox"/> MDHHS Juvenile Justice Managers/Staff <input checked="" type="checkbox"/> MDHHS Child Welfare Managers/Staff <input checked="" type="checkbox"/> Native American Tribes <input checked="" type="checkbox"/> Office of Workforce Development and Training <input checked="" type="checkbox"/> Private Agency Child Welfare Managers/Staff <input type="checkbox"/> Private Residential Abuse/Neglect Managers/Staff <input type="checkbox"/> Private Residential Juvenile Justice Managers/Staff <input type="checkbox"/> Other:	

The Office of Child Support (OCS) will no longer be establishing new child support orders for children removed and placed in foster care. The OCS policies have been revised to reflect this change. The effective date of this change is August 1, 2023.

Immediate Impact to Child Welfare Staff

These changes do not require child welfare casework staff or funding specialists to do anything differently. Title IV-D Child Support program will seek to establish paternity without an accruing support order. However, in rare circumstances, a court may order a charging support obligation. In these instances, the Children's Services Administration (CSA) has asked OCS to enforce the support order. Once paternity is established for the child(ren), OCS will notify the casework staff of when and how paternity was established.

History and Context

The Children's Bureau within the Federal Administration for Children and Families issued revised policy on June 8, 2022, emphasizing that foster care referrals to the child support program should be the exception and not the rule.¹ On July 29, 2022, the Children's Bureau and the federal Office of Child Support Enforcement (OCSE)² issued a joint letter encouraging title IV-E agencies to implement policies to only seek assignment of child support in rare circumstances.³ This will allow families to focus on economic stability, family stability, and reunification.

Research shows that when parents are required to pay child support on agency placement cases, children are likely to remain in foster care placements longer. This is because support payments

¹ Ref: [8.4C TITLE IV-E, General Title IV-E Requirements, Child support, Question 5 of the Child Welfare Policy Manual.](#)

² OCSE is also within ACF.

³ Ref: [Dear Colleague Letter \(DCL\) 22-06, "Children's Bureau - OCSE Joint Letter on Updated Child Support Referral Policy."](#)

reduce the economic resources that parents need to meet the requirements for reunification.⁴ Recent research also highlights the high cost and low cost-effectiveness of pursuing child support orders to reimburse foster care program costs.⁵

The CSA has adopted, in part, the federal guidance mentioned above, and determined that the pursuit of monetary support in foster care cases is, in most cases, not in the best interests of the child and may hinder MDHHS's efforts toward family reunification.⁶ Therefore, CSA has asked the Title IV-D Child Support program to stop establishing orders for parents to pay support on agency placement cases that CSA refers to the IV-D program.⁷ That is to say, CSA has opted not to seek assignment of rights the parents have to future support. The CSA's request of the Title IV-D Child Support program affects all cases referred to OCS, including those funded through state and county funds without title IV-E funding.

For referred cases that have support orders established prior to the referral from CSA, the Title IV-D Child Support program will continue to assign the accruing support to the state/county. Despite the federal guidance mentioned above, Michigan law requires assignment of child support if a parent is receiving court-ordered child support for their child and the child enters foster care.⁸

⁴ Ref: Chellew, Carol, Noyes, Jennifer L., and Rebekah Selekman. (2012). [Child Support Referrals for Out-of-Home Placements: A Review of Policy and Practice](#) Madison, WI: Institute for Research on Poverty, University of Wisconsin–Madison. Ref: Cancian, Maria & Cook, Steven & Seki, Mai & Wimer, Lynn. (2016). [Making parents pay: The unintended consequences of charging parents for foster care](#). *Children and Youth Services Review*.

⁵ Ref: Skophammer, Trish. (2017). [Child Support Collections to Offset Out-Of-Home Placement Costs: A Study of Cost Effectiveness](#). Hamline University.

⁶ CSA is responsible for determining criteria for cases in which it believes the IV-D program needs to pursue a child support order. (The federal guidance terms this "exception" criteria.) Although CSA has not established exception criteria at this time, it may do so in the future. Until then, IV-D will not establish support orders on *any* referrals from CSA.

⁷ OCS will work with CSA to address changes needed to discontinue receiving agency placement referrals through the MiCSES/MiSACWIS interface that do not require IV-D services.

⁸ Ref: MCL 552.605d(6).