



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

RICK SNYDER
GOVERNOR

NICK LYON
DIRECTOR

May 16, 2018

Rick Lowe, Chief Internal Auditor
Office of Internal Audit Services
George W. Romney Building
111 South Capitol, 8th Floor
Lansing, Michigan 48913

Dear Mr. Lowe:

In accordance with the State of Michigan, Financial Management Guide, Part VII, attached are the summary table identifying our responses and corrective action plans to address recommendations contained within the Office of the Auditor General's Performance Audit of Interstate Compact Program.

Questions regarding the summary table or corrective action plans should be directed to me at 517-373-1508 or MyersP3@michigan.gov.

Sincerely,

Pam Myers, Director
Bureau of Audit, Reimbursement, and Quality Assurance

PM:kk

Enclosure

c: Office of the Auditor General	House Appropriations Committee
House Fiscal Agency	House Standing Committee
Senate Fiscal Agency	Senate Appropriations Committee
Executive Office	Senate Standing Committee
DHHS, Nick Lyon	DHHS, Farah Hanley
DHHS, Nancy Vreibel	DHHS, Geralyn Lasher
DHHS, Dr. Herman McCall	DHHS, Karla Ruest

PERFORMANCE AUDIT OF
INTERSTATE COMPACT PROGRAM

DEPARTMENT OF HEALTH AND HUMAN SERVICES

MAY 16, 2018

AUDIT RESPONSE

Approved: _____

Sarah A. Hanley

Farah A. Hanley, Senior Deputy Director
Department of Health and Human Services

Date: _____

5/16/18



AUDIT REPORT SUMMARY

DEPARTMENT: Department Wide

AUDIT PERIOD: October 1, 2012 through April 30, 2016

REPORT DATED: December 20, 2017

DISPOSITION OF AUDIT RECOMMENDATIONS

CITATIONS COMPLIED WITH	CITATIONS TO BE COMPLIED WITH	CITATIONS MDHHS DID NOT AGREE WITH
	Finding 1 (09/30/2020)	
	Finding 2 (09/30/2020)	
	Finding 3 (09/30/2020)	
	Finding 4 (08/01/2018)	
	Finding 5 (09/30/2019)	
	Finding 6 (01/15/2019)	

Audit Response
Performance Audit
Interstate Compact Program Audit
Department of Health and Human Services
October 1, 2012 through April 30, 2016

Recommendation 1: Improvements needed in monitoring and documenting caseworkers' face-to-face visits and supervision reports in preparing, submitting, and receiving supervision reports.

We recommend that MDHHS improve its monitoring and documentation of caseworkers' face-to-face visits and supervision reports for interstate placed children. We also recommend that MDHHS improve its preparation, submission, and receipt of supervision reports provided to and obtained from other states.

Response

MDHHS is in the process or has implemented several corrective actions:

- MDHHS has begun the process to include ICPC functionality in the Michigan Statewide Automated Child Welfare Information System (MiSACWIS) as well as utilization of a new ICPC case management system (NEICE). This will enhance MDHHS documentation of monthly face-to-face visits with children placed in Michigan and provide a mechanism for monitoring of monthly face-to-face visits of Michigan children placed in other states. In addition, this will aid MDHHS in preparing and tracking required supervision reports to other states with children placed in Michigan as well as provide tracking capabilities of timely receipt, or follow-up, of supervision reports for Michigan children placed in other states.

MDHHS began meeting with Netlogx staff for Business Process Mapping (BPM) of the ICPC/NEICE project in November 2017. In December 2017, MDHHS began bi-weekly BPM meetings, which are continuing to date. Business Process Mapping is the first step in the process to include ICPC functionality in MiSACWIS and utilization of NEICE. MDHHS has an expected completion date of September 30, 2020.

- MDHHS has modified the ICPC access database to track supervision reports and face-to-face visits pending full ICPC functionality in MiSACWIS and implementation of NEICE. ICPC staff have created reports from the access database to monitor receipt of supervision reports and face-to-face visits, including whether visits occurred in the home. ICPC staff also follow up with MDHHS staff (for outgoing reports and face-to-face visits) and other states (for incoming reports and face-to-face visits) as necessary.

MDHHS is making enhancements to the design of the reports for ease of use and improved functionality. Follow up with MDHHS staff and other states is ongoing during report enhancement. MDHHS has an expected completion date of May 20, 2018.

- A centralized email account has been created for ICPC to improve monitoring and tracking of incoming and outgoing ICPC work. MDHHS introduced the new ICPC mailbox address and procedures for communication with ICPC staff during the November 2017 monthly supervisory call. The State ICPC webpage has also been updated with the new email account address.
- ICPC began participating in monthly supervisory calls with MDHHS local office supervisors in June of 2017 to provide education and clarification on ICPC requirements, policies and processes, including preparing and submitting supervision reports. Minutes from these calls are distributed to MDHHS Business Service Center analysts and private agency analysts with instructions to

distribute them to MDHHS local office child welfare supervisors and staff and private agency supervisors and staff.

Recommendation 2: Improved monitoring and timely completion of non-expedited home study reports needed for out-of-state placements.

We recommend that MDHHS improve its monitoring and timely completion of non-expedited home study reports for the proposed out-of-state placements of children within and outside of Michigan.

Response

MDHHS is in the process or has implemented several corrective actions:

- MDHHS has begun the process to include ICPC functionality in MiSACWIS as well as utilization of a new ICPC case management system (NEICE). This will allow for better tracking capabilities for timely completion of home study reports for the proposed placements of out-of-state children in Michigan and allow for improved monitoring of timeliness of home study reports requested from other states.

MDHHS began meeting with Netlogx staff for Business Process Mapping (BPM) of the ICPC/NEICE project in November 2017. In December 2017, MDHHS began bi-weekly BPM meetings, which are continuing to date. Business Process Mapping is the first step in the process to include ICPC functionality in MiSACWIS and utilization of NEICE. MDHHS has an expected completion date of September 30, 2020.

- MDHHS began utilizing the ICPC access database to more efficiently monitor receipt of home study reports pending full ICPC functionality in MiSACWIS and implementation of NEICE. The existing access database report has been enhanced to improve monitoring of receipt of home study reports and follow up with MDHHS staff (for outgoing reports) and with other states (for incoming reports) as necessary. In January of 2018, MDHHS began consistently running daily reports from the access database to monitor receipt of home study reports which improves follow up. Processes have been adjusted to require earlier and more frequent follow up.
- A centralized email account has been created for ICPC to improve monitoring and tracking of incoming and outgoing ICPC work. MDHHS introduced the new ICPC mailbox address and procedures for communication with ICPC staff during the November 2017 monthly supervisory call. The State ICPC webpage has also been updated with the new email account address.
- ICPC began participating in monthly supervisory calls with MDHHS local office supervisors in June of 2017 to provide education and clarification on ICPC requirements, policies and processes, including timely completion of home study reports. Minutes from these calls are distributed to MDHHS Business Service Center analysts and private agency analysts with instructions to distribute them to MDHHS local office child welfare supervisors and staff and private agency supervisors and staff.

Recommendation 3: Improvements needed in the timeliness and monitoring of non-expedited placement decisions.

We recommend that MDHHS consistently provide timely placement decisions and strengthen its monitoring of placement decisions for non-expedited requests from other states.

Response

MDHHS is in the process or has implemented several corrective actions:

- MDHHS has begun the process to include ICPC functionality in MiSACWIS as well as utilize a new ICPC case management system (NEICE). This will enhance MDHHS' tracking capabilities

to ensure timelier placement decisions requested by other states for placement of out-of-state children into Michigan. This will also aid MDHHS in monitoring placement decisions requested from other states for out-of-state placements.

- MDHHS began meeting with Netlogx staff for Business Process Mapping (BPM) of the ICPC/NEICE project in November 2017. In December 2017, MDHHS began bi-weekly BPM meetings, which are continuing to date. Business Process Mapping is the first step in the process to include ICPC functionality in MiSACWIS and utilization of NEICE. MDHHS has an expected completion date of September 30, 2020.
- MDHHS has modified the ICPC access database to track licensure status for placement decisions pending full ICPC functionality in MiSACWIS and implementation of NEICE. MDHHS enhanced the existing access database report to allow ICPC staff to better monitor receipt of placement decisions and follow up with MDHHS staff (for outgoing decisions) and other states (for incoming decisions) as necessary.

MDHHS began consistently running the enhanced report in January 2018. In addition, processes have been adjusted to require earlier and more frequent follow up.

- In September of 2016, MDHHS changed its business process to allow for relative placements pending licensure, if permitted by the sending state, which allows for quicker placement of children with relative caregivers.
- A centralized email account has been created for ICPC to improve monitoring and tracking of incoming and outgoing ICPC work. MDHHS introduced the new ICPC mailbox address and procedures for communication with ICPC staff during the November 2017 monthly supervisory call. The State ICPC webpage has also been updated with the new email account address.
- ICPC began participating in monthly supervisory calls with MDHHS local office supervisors in June of 2017 to provide education and clarification on ICPC requirements, policies, and processes, including timely placement decisions. Minutes from these calls are distributed to MDHHS Business Service Center analysts and private agency analysts with instructions to distribute them to MDHHS local office child welfare supervisors and staff and private agency supervisors and staff.

Recommendation 4: Improvements needed in conducting criminal history and Central Registry checks during home evaluations for proposed relocations of juveniles.

We recommend that MDHHS ensure that the home evaluations conducted for relocating out-of-state juveniles into Michigan include criminal history and Central Registry checks for all of the adults living in the proposed residence. We also recommend that MDHHS reevaluate the risks associated with discontinuing its practice to request that the home evaluations conducted for the relocation of Michigan's juveniles to other states include criminal history and Central Registry checks for all adults living in the proposed residence.

Response

MDHHS is in the process or has implemented several corrective actions:

- MDHHS elected to remove the policy requirement for checks on outgoing referrals as there was no legal basis for them and not all states have registries; therefore, MDHHS cannot enforce requests of other states. Beginning in February of 2017, MDHHS resumed making requests for criminal history and Central Registry checks for out-of-state placement requests for Michigan juveniles.

- MDHHS issued an ICJ program instruction in March 2017 describing criminal history and Central Registry check requirements for out-of-state juveniles coming into Michigan, which augmented ICJ policy updated in January of 2016. MDHHS began internal monitoring for applicable checks following issuance of the program instruction.
- ICJ began participating in monthly supervisory calls with MDHHS local office supervisors in June of 2017 to provide education and clarification on ICJ requirements, policies, and processes. Minutes from these calls are distributed to MDHHS Business Service Center analysts and private agency analysts with instructions to distribute them to MDHHS local office child welfare supervisors and staff and private agency supervisors and staff.
- MDHHS will revise policy to incorporate the Program Instruction regarding documentation requirements. MDHHS is currently rewriting ICM 150, Interstate Probation and Parole Supervision and has an expected completion date of August 1, 2018.

Recommendation 5: Improvements needed in conducting monthly face-to-face visits with out-of-state juveniles placed in Michigan.

We recommend that MDHHS conduct monthly face-to-face visits with out-of-state juveniles placed in Michigan and conduct visits within the juveniles' homes every other month.

Response

MDHHS is in the process or has implemented several corrective actions:

- An ICJ Program Instruction was issued in February 2017 to address visit requirements. MDHHS began reviewing monthly visits within MiSACWIS in March 2017 with results being tracked on a spreadsheet for internal monitoring. MDHHS Children's Service Agency issued a communication in November 2017 regarding visit requirements, which reached a broader audience than the program instruction.
- ICJ began participating in monthly supervisory calls with MDHHS local office supervisors in June of 2017 to provide education and clarification on ICJ requirements, policies, and processes. Minutes from these calls are distributed to MDHHS Business Service Center analysts and private agency analysts with instructions to distribute them to MDHHS local office child welfare supervisors and staff and private agency supervisors and staff.
- MDHHS is in the process of developing a MiSACWIS change control request to include system alerts for ICJ cases which will prompt workers and/or supervisors regarding visits. The request was submitted during January 2018 and MDHHS has an expected completion date of September 30, 2019.

Recommendation 6: Improvements needed in monitoring courts' compliance with ICJ and in training and educating court officials.

We recommend that the ICJ compact administrator improve the monitoring of the family divisions of the circuit courts' compliance with the ICJ. We also recommend that the compact administrator improve Michigan's training and education plan for court officials regarding the regulation of interstate movement of juveniles.

Response

MDHHS is in the process or has implemented several corrective actions:

- MDHHS developed a monitoring protocol to track compliance with the ICJ and submitted it to SCAO in January of 2018.

- The ICJ compliance guide and training plan for courts was submitted to SCAO in January 2018. The training plan includes links to reference materials used in ICJ including the ICJ rules, the Judicial ICJ Toolkit, and the Court Benchbook.
- MDHHS will provide training to court staff as delineated in the training plan. The training plan recommends that appropriate court staff attend ICJ rules training provided in webinar format (four hours in two sessions) by national ICJ during the months of March-August 2018. The Michigan ICJ Commissioner has volunteered and will provide some of this training along with ICJ practitioners from other states. As part of the training plan, the ICJ Commissioner has asked SCAO to publicize training availability in their recurring publications. In the meantime, the state Commissioner continues to make himself available to provide training to Courts upon request. MDHHS has an expected completion date of January 15, 2019.
- In March of 2017, MDHHS provided input for a probation officer manual for ICJ via the Michigan Judicial Institute and distributed an ICJ Bench Card to SCAO.