

Office of the Auditor General
Performance Audit Report

**Select Licensing and Monitoring Activities of
Child Placing Agencies**

Michigan Department of Health and Human Services

December 2021

The auditor general shall conduct post audits of financial transactions and accounts of the state and of all branches, departments, offices, boards, commissions, agencies, authorities and institutions of the state established by this constitution or by law, and performance post audits thereof.

The auditor general may make investigations pertinent to the conduct of audits.

Article IV, Section 53 of the Michigan Constitution



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Office of the Auditor General

Report Summary

Performance Audit

Select Licensing and Monitoring Activities of Child Placing Agencies

Michigan Department of Health and Human Services (MDHHS)

Report Number:
431-2780-16

Released:
December 2021

MDHHS is responsible for licensing and monitoring child placing agencies (CPAs) that deliver foster care, adoption, and other services for children in Michigan's foster care system. State law requires MDHHS to perform an on-site visit of a CPA before issuing or renewing a license and to periodically assess each CPA's continued compliance with applicable licensing rules, laws, and MDHHS policies through an on-site evaluation of the CPA at least once a year. As of October 2021, approximately 160 licensed CPAs existed throughout the State.

Audit Objective			Conclusion
Objective: To determine the effectiveness of selected MDHHS activities to license and monitor child placing agencies and services.			Effective, with exceptions
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
Over 90% of the finalized adoption records we reviewed remained accessible on average 78 days beyond a 21-day record restriction requirement (Finding 1).	X		Agrees
A 10% or more discrepancy existed between the roster of children CPAs provided to MDHHS and MDHHS's records for nearly 50% of the CPAs we reviewed. MDHHS used the rosters for its annual inspection sampling. In addition, MDHHS replaced almost 80% of the foster homes it sampled without a documented good cause (Finding 2).		X	Agrees

Findings Related to This Audit Objective (Continued)	Material Condition	Reportable Condition	Agency Preliminary Response
<p>Although State law requires CPA staff to maintain suitable backgrounds, it does not require CPAs to conduct periodic background checks of their staff. MDHHS did not:</p> <ul style="list-style-type: none"> • Provide its licensing consultants with clear direction for monitoring CPA staff backgrounds. • Consistently document the monitoring procedures conducted related to background checks. • Include independent background checks of CPA staff in its monitoring procedures (<u>Finding 3</u>). 		X	Agrees
<p>For the CPAs we reviewed, MDHHS did not maintain 45% of the assessment tools used to document the annual on-site inspection activities (<u>Finding 4</u>).</p>		X	Partially agrees
<p>MDHHS had not developed formalized procedures to compile and analyze inspection results to identify significant trends in CPA activities and services (<u>Finding 5</u>).</p>		X	Agrees

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Doug A. Ringler, CPA, CIA
Auditor General

December 22, 2021

Ms. Elizabeth Hertel, Director
Michigan Department of Health and Human Services
South Grand Building
Lansing, Michigan

Dear Ms. Hertel:

This is our performance audit report on Select Licensing and Monitoring Activities of Child Placing Agencies, Michigan Department of Health and Human Services.

Your agency provided preliminary responses to the recommendations at the end of our fieldwork. The *Michigan Compiled Laws* and administrative procedures require an audited agency to develop a plan to comply with the recommendations and to submit it to the State Budget Office upon completion of an audit. Within 30 days of receipt, the Office of Internal Audit Services, State Budget Office, is required to review the plan and either accept the plan as final or contact the agency to take additional steps to finalize the plan.

We appreciate the courtesy and cooperation extended to us during this audit.

Sincerely,

A handwritten signature in black ink that reads "Doug Ringler". The signature is written in a cursive, flowing style.

Doug Ringler
Auditor General

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AUDIT OBJECTIVES, CONCLUSIONS, FINDINGS, AND OBSERVATIONS

SELECTED ACTIVITIES TO LICENSE AND MONITOR CHILD PLACING AGENCIES AND SERVICES

BACKGROUND

The Michigan Department of Health and Human Services (MDHHS) licenses and monitors child placing agencies* (CPAs) in accordance with the Child Care Organizations Act (Sections 722.111 - 722.128 of the *Michigan Compiled Laws*) to help protect foster care and adoptive children.

Typical CPA services include:

- Placing children* in licensed foster homes*, unlicensed relative foster homes*, and/or in adoptive homes.
- Supervising the care of the child, including monitoring the child's service plans*.
- Conducting regular meetings with foster children, biological parents, and foster parents.
- Investigating prospective adoptive homes.
- Investigating, assessing, and recommending foster homes for licensure.
- Conducting special evaluations* of complaints* regarding a licensed foster home's compliance with licensing rules or laws.

State law requires MDHHS to perform an on-site visit of a CPA before issuing or renewing a license. Also, MDHHS must periodically assess each CPA's continued compliance with applicable licensing rules, laws, and MDHHS policies through an on-site evaluation of the CPA at least once a year. MDHHS is also required to conduct special investigations* of CPAs when it receives complaints alleging a CPA's violation of State law, licensing rules, or the terms of its contract.

MDHHS licensing consultants* use three standardized assessment tools* when conducting on-site inspections to monitor each CPA's compliance with applicable licensing rules, laws, and MDHHS policies. Prior to conducting the on-site inspection, an MDHHS field analyst* visits a sample of foster homes and unlicensed relative foster homes served by the CPA to verify child safety and well-being and to assess the foster parents' satisfaction with the CPA's services.

When conducting the on-site CPA inspection, the MDHHS licensing consultant's activities include, but are not limited to:

- Reviewing a sample of the CPA's foster care* and adoption* records to evaluate the CPA's service delivery.

* See glossary at end of report for definition.

- Examining a sample of the CPA's employee files to assess sampled individuals' qualifications, the CPA's performance of required background checks, and the CPA's provision of adequate employee training.
- Verifying the CPA completed special evaluations, as applicable, related to complaints received for foster homes the CPA recommended for licensure.
- Conducting follow-up with the CPA regarding any issues the field analyst identified during the foster home and unlicensed relative foster home visits.
- Assessing whether the CPA implemented corrective action for any findings identified in the prior licensing consultant report.
- Providing technical assistance as needed.

After completion of the inspection, the MDHHS licensing consultant develops and issues a final licensing inspection report to the CPA indicating the results of the on-site inspection. This report includes any issues identified during foster home and unlicensed relative foster home visits, the CPA's required corrective action for any violations identified during the inspection process, and the status of the CPA's license.

In addition to its annual inspection monitoring activities, MDHHS processes background check results for CPA licensees* and administrators and completes administrative reviews* of any good moral character* offenses that may disqualify the administrator or impact the CPA's license. In addition, MDHHS processes background check results for the foster and adoptive parents* and other adult household members* of these homes recommended for licensure to ensure the individuals have suitable backgrounds.

MDHHS records key licensing inspection information within the Bureau Information Tracking System* (BITS) including but not limited to inspection dates, corrective action plan due dates, and the type of license issued.

As of October 2021, approximately 160 licensed CPAs existed throughout the State (see supplemental information).

AUDIT OBJECTIVE

To determine the effectiveness* of selected MDHHS activities to license and monitor child placing agencies and services.

CONCLUSION

Effective, with exceptions.

* See glossary at end of report for definition.

**FACTORS
IMPACTING
CONCLUSION**

- MDHHS completed 97% of annual CPA licensing inspections timely for the 2-year period reviewed.
- MDHHS ensured the CPA licensees and administrators for all CPAs reviewed had suitable backgrounds, and MDHHS had completed administrative reviews for good moral character offenses, as applicable.
- MDHHS ensured the homes recommended by CPAs for foster care licensure or adoptions consisted of parents and adult household members with suitable backgrounds for all homes reviewed.
- MDHHS initiated and completed timely special investigations for complaints received regarding CPA services for the 2-year period reviewed.
- MDHHS ensured CPAs completed timely special evaluations of complaints, as applicable, for the 2-year period reviewed.
- For the 11 CPAs selected for our detailed file review, MDHHS:
 - Completed annual on-site licensing inspections and issued final licensing reports that identified whether the CPA had instances of noncompliance with licensing rules, laws, and MDHHS policies that, in general, were consistent with our independent review for:
 - Foster children.
 - Licensed foster homes.
 - Unlicensed relative foster homes.
 - Adoptive homes.
 - Employees.
 - Ensured required background checks were completed for:
 - CPA staff prior to employment.
 - Foster parents, adoptive parents, unlicensed relatives, and other adult household members.
 - Monitored the corrective action plans submitted by the CPAs to address identified instances of noncompliance.
- The material condition* related to MDHHS's monitoring of finalized adoption records (Finding 1).

* See glossary at end of report for definition.

- Four reportable conditions* related to needed improvements in MDHHS's:
 - Sampling* guidance and procedures for annual inspections (Finding 2).
 - Monitoring of CPA processes for staff background checks (Finding 3).
 - Documentation of annual on-site licensing inspections (Finding 4).
 - Evaluation of annual licensing inspection results (Finding 5).

* See glossary at end of report for definition.

FINDING 1

Improvement is needed in MDHHS's monitoring of finalized adoption records.

MDHHS needs to improve its monitoring of CPA finalized adoption records to help ensure these records are appropriately secured and stored. Improved monitoring would help MDHHS ensure compliance with State law and MDHHS policies, which are designed to help prevent unauthorized access to highly sensitive records and ensure appropriate storage and retention for response to requests involving, but not limited to, court orders or investigations conducted by the Office of Children's Ombudsman*.

- *Michigan Compiled Laws* require:
 - 21 days following a final order of adoption, an adoption record shall not be copied or inspected without a court order or request for inspection by the Office of Children's Ombudsman.
 - Adoption records are to be kept in separate locked files.
- MDHHS policy requires CPAs to restrict access to adoption records after the final order of adoption unless they receive a court order to copy or inspect the records or a request from the Office of Children's Ombudsman to inspect the records. This includes restricting access to the electronic Michigan Statewide Automated Child Welfare Information System (MiSACWIS) records and storing hard-copy records in separate locked files.
- The *Michigan Administrative Code* and MDHHS policy require CPAs to retain hard-copy adoption records for one year following the final order of adoption and then send them to MDHHS for permanent retention.

We reviewed 35 finalized adoption records in MiSACWIS and observed the physical storage of the related hard-copy records at 11 selected CPAs. We noted:

- a. MDHHS did not always ensure CPAs appropriately restricted access to electronic and/or hard-copy finalized adoption records.

Specifically:

- (1) CPAs did not block access to the electronic MiSACWIS records within 21 days for 32 (91%) of the 35 finalized adoption records. Instead, these records remained accessible, on average, for 78 days, ranging from 1 to 429 days after the 21-day period.

State law requires access to be restricted to adoption records 21 days following final order of adoption; however, 91% of reviewed records remained accessible on average 78 days beyond the requirement.

* See glossary at end of report for definition.

MDHHS's annual monitoring procedures did not evaluate CPAs' compliance with the required 21-day record restriction time frame, nor did MDHHS specify in its policy that CPAs were required to block access to the electronic record within 21 days following the final order of adoption.

- (2) CPAs did not securely store hard-copy finalized adoption records at 4 (36%) of the 11 CPAs. During our site visits to these CPA offices, we observed hard-copy finalized adoption records stored in unlocked file cabinets or rooms and accessible to all CPA employees. For example, we observed hard-copy finalized adoption records stored in unlocked file cabinets located in the center of a shared staff workspace at one CPA office, and at another CPA office, we observed adoption records stored in an unoccupied office with the door open and the keys in the door handle.

MDHHS's annual monitoring procedures did not specifically address the requirements for finalized adoption records to be stored in separate locked files with access limited to inspection only by court order, audit, or investigation.

- b. MDHHS had not implemented a process to ensure CPAs submitted all finalized hard-copy adoption records to MDHHS for permanent retention one year following the final order of adoption, as required by the *Michigan Administrative Code*.

Of the 35 finalized adoption records we reviewed, 34 had been finalized for more than one year. However, we noted 7 CPAs had not yet submitted 15 (44%) of the finalized records to MDHHS for permanent retention at the date of our review. These 15 records were finalized from 17 to 40 months prior to our review date.

MDHHS informed us it was in the process of developing a reconciliation procedure at the time of our review; however, it had not developed a comprehensive list of CPA submitted records in its possession to compare with MiSACWIS. MDHHS also informed us it had a significant backlog of unprocessed finalized adoption records submitted by the CPAs for permanent retention because a *Michigan Administrative Code* change in 2015 shifted the responsibility for permanent retention from the CPAs to MDHHS.

We consider this finding to be a material condition because of the highly sensitive nature of adoption records and the existence of law restricting access without a court order. Also, a high percentage of finalized adoption records reviewed remained accessible beyond 21 days of the final order of adoption.

RECOMMENDATION

We recommend that MDHHS improve its monitoring of CPA finalized adoption records to help ensure these records are appropriately secured and stored.

**AGENCY
PRELIMINARY
RESPONSE**

MDHHS provided us with the following response:

MDHHS agrees.

MDHHS will update Division of Child Welfare Licensing (DCWL) policy and procedures by December 2021 to ensure consultants are evaluating compliance with the 21-day record restriction time frame and the requirement to securely store hardcopies of finalized adoption records. MDHHS will cite CPAs for any noncompliance issues identified as outlined in Adoption Assistance Manual 1030.

MDHHS updated the Adoption Case Record Retention policy in July 2019 to provide CPAs with specific time frames for submission of closed adoption records to MDHHS for permanent retention. The Adoption and Guardianship Assistance Office (AGAO) also implemented an inventory protocol in October 2020 that tracks closed adoption records for permanent retention. Effective November 2021, AGAO will compare the MiSACWIS monthly data report of finalized adoption cases to the inventory of cases received for retention for reconciliation purposes to ensure all closed adoption cases are received on a timely basis. The inventory protocol will be updated accordingly to reflect this new reconciliation process and MDHHS will follow up on closed adoption records that have not been received within the required time frame. In addition, the backlog of unprocessed, finalized records has been resolved.

FINDING 2

Improved sampling guidance and procedures are needed for annual inspections of CPAs.

MDHHS needs to improve its annual inspection guidance and procedures to help ensure sample populations are complete and replacement of sample items is appropriate. Using incomplete populations and/or inappropriately replaced sample items increases the risk MDHHS could reach improper conclusions regarding whether a CPA's services comply with licensing requirements and are conducive to the welfare of children.

State law requires MDHHS to conduct annual inspections of CPAs to evaluate compliance with licensing requirements. As part of its annual CPA inspections, MDHHS:

- Uses sampling to evaluate and conclude on a CPA's compliance and services when it may not be efficient to review all children's cases or foster homes providing services to children assigned to the CPA.
- Selects a sample of children's cases for review, from a roster of children provided by the CPA for whom the CPA provided services during the inspection period, to assess the CPA's compliance with applicable licensing requirements and service delivery.
- Conducts on-site visits at sampled foster homes recommended for licensure by the CPA to assess the health and safety of the foster children and evaluate the foster parents' general satisfaction with the CPA's foster care services.

We analyzed pertinent MDHHS policies, procedures, and records and performed data analytics related to our 11 selected CPAs and observed that MDHHS used sampling to select children's cases and foster homes for its annual inspections for all 11 of the CPAs. We noted:

- a. MDHHS had not implemented guidance and/or procedures for licensing consultants to verify the completeness of the CPA-provided rosters of children it used to select children's cases for review during annual licensing inspections.

We compared the roster of children provided by each selected CPA with the child information recorded in MiSACWIS for the CPA. We determined all 11 CPAs had excluded some children from the roster it provided to MDHHS.

Five (45%) of the 11 had underreported by 10% or more, as outlined in the table below:

Assigned CPA in MiSACWIS	Number of Children in MiSACWIS		Total Assigned to CPA	Percent of Children Excluded
	Included on CPA's Submitted Roster	Excluded From CPA's Submitted Roster		
CPA 1	66	41	107	38%
CPA 2	358	72	430	17%
CPA 3	100	18	118	15%
CPA 4	291	39	330	12%
CPA 5	80	9	89	10%

MDHHS informed us it relied on the CPA-provided rosters for its annual inspection procedures and believed the differences occurred because the CPAs likely provided the rosters as of a point in time, rather than for the entire inspection period.

- b. MDHHS had not implemented guidance to assist field analysts in determining when replacement of a selected sample item was appropriate and/or properly documenting justification for replaced sample items.

Field analysts frequently replaced sampled foster homes without a documented good cause.

Our review noted field analysts replaced 51 (78%) of 65 sampled foster homes without reason for the replacement or identified a reason that likely would not justify sample item replacement. Further, in some cases, the noted reason could have potentially indicated greater risk associated with the foster home. The reasons included, but were not limited to, inaccurate contact information for the foster home or the lack of response from the foster parents for scheduling or confirming a time for the on-site visit.

MDHHS informed us field analysts are responsible for identifying sample selections during annual inspections and its guidance did not require field analysts to seek their supervisor's approval to determine whether replacement of a selected sample item was appropriate and/or to document justification for sample deviations.

RECOMMENDATION

We recommend that MDHHS improve its annual inspection guidance and procedures to help ensure sample populations are complete and replacement of sample items is appropriate.

**AGENCY
PRELIMINARY
RESPONSE**

MDHHS provided us with the following response:

MDHHS agrees.

By March 2022, MDHHS will develop and implement a process to help ensure the completeness of sampling populations. MDHHS will compile the sampling populations and have the CPAs review to verify the populations reconcile with the records retained by the agency. This will ensure that when selecting children's cases for review during annual licensing inspections, licensing consultants and field analysts will have the complete population of children.

In June 2021, MDHHS updated the DCWL Policy and Procedures Manual providing guidance to field analysts to help determine when replacement of a sample selection is appropriate. Beginning November 2021, field analysts will be required to document justification for sample deviations and seek approval from supervision to determine when replacement of a selected sample is appropriate.

FINDING 3

Improved monitoring of CPA staff background checks is needed.

MDHHS needs to strengthen its monitoring of CPA background check processes to ensure CPAs employ only individuals who maintain suitable backgrounds. Doing so would help MDHHS ensure CPAs continually comply with State law requirements that are intended to protect children who receive CPA services.

The Child Care Organizations Act, Public Act 116 of 1973 (Sections 722.111 - 722.128 of the *Michigan Compiled Laws*) provides the following applicable requirements:

- Section 722.118a requires MDHHS to assess a CPA's continued compliance with the Act.
- Section 722.115d(2) states a CPA shall not continue to employ a person if a search of the Michigan Department of State Police's (MSP's) Internet Criminal History Access Tool* (ICHAT) reveals the employee has been convicted of a listed offense.
- Section 722.119(2)(a) stipulates CPA staff members shall not have contact with children in the care of a CPA if the individual has been convicted of child abuse* or neglect*.
- Section 722.119(3) indicates if an updated Central Registry* clearance documents that a staff member is named as a perpetrator of child abuse or neglect in a Central Registry case, the individual may not be present in the CPA.

Although the Act requires CPA staff who have contact with children in the care of a CPA to maintain suitable backgrounds, it does not require CPAs to conduct periodic background checks for those staff. Consequently, MDHHS informed us CPAs are permitted to develop their own policies to ensure staff maintain suitable backgrounds while employed and its annual inspections evaluate these policies by selecting staff files and reviewing any related background check documentation that may exist within the selected files. MDHHS uses its CPA employee assessment tool to guide and document licensing consultants' annual inspections. Our review noted:

- a. MDHHS's CPA monitoring tool did not provide clear instructions to the licensing consultant for assessing compliance with Sections 722.115(d)(2), 722.119(2)(a), and 722.119(3) of the *Michigan Compiled Laws* and citing noncompliance. The tool instructs the licensing consultant to determine only whether the CPA has a related policy and indicates the consultant **may** cite the CPA if criminal record check documentation is not retained in accordance with the CPA's policy. The tool does not address actions available to the licensing consultant related to Central Registry clearance information.

* See glossary at end of report for definition.

- b. MDHHS licensing consultants did not retain 6 of the 11 completed tools to document their review of CPA's criminal background procedures for staff. We also noted none of the 5 tools retained identified what information the licensing consultant had reviewed to conclude the CPA's staff had maintained suitable backgrounds while employed.
- c. MDHHS does not perform an independent check of ICHAT or Central Registry records during its annual inspections for selected CPA staff to confirm the suitability of their background. MDHHS presumes if no documentation to the contrary exists within the selected employee's file, the individual does not have a criminal conviction or Central Registry record that would disqualify their continued employment.

RECOMMENDATION

We recommend that MDHHS strengthen its monitoring of CPA background check processes to ensure CPAs employ only individuals who maintain suitable backgrounds.

**AGENCY
PRELIMINARY
RESPONSE**

MDHHS provided us with the following response:

MDHHS agrees.

MDHHS asserts that agencies are independently responsible for maintaining compliance with Sections 722.115d(2), 722.119(2)(a), and 722.119(3) of the Michigan Compiled Laws by establishing protocols that require disclosures of additional criminal activity by current employees or recurring background checks. MDHHS will expand on its annual CPA compliance review to verify each CPA is following their established protocol. MDHHS will also clarify instructions for the licensing consultant that the CPA can be cited if criminal record check documentation is not maintained in accordance with CPA policy and will include actions that are available to the licensing consultant regarding any updated Central Registry information.

FINDING 4

Improvement is needed in documenting annual on-site licensing inspections.

45% of assessment tools were not maintained to help support annual on-site licensing inspection activities for the 11 CPAs reviewed.

MDHHS needs to improve its documentation of annual on-site CPA inspections to demonstrate the inspections were conducted in a manner that consistently mitigates potential risks to the health and safety of foster children and fully supports its licensing decisions.

The *Michigan Compiled Laws* require MDHHS to:

- Investigate and perform annual on-site inspections of activities prior to issuing or renewing a CPA's license.
- Issue a license to a CPA if MDHHS is satisfied the CPA's services and facilities are conducive to the welfare of the children.
- Maintain records that are necessary for the adequate and proper recording of its activities and protection of the legal rights of the State.

We examined MDHHS records for the most recent on-site annual licensing inspections for our 11 selected CPAs. We noted:

- a. MDHHS frequently did not retain the annual on-site licensing inspection assessment tools. The completed assessment tools are MDHHS's comprehensive record of the annual on-site inspection activities conducted and provide detailed documentation to support the criteria evaluated and the sample items tested to reach its final on-site licensing inspection conclusions. We noted MDHHS had not retained 15 (45%) of 33 assessment tools for the most recent annual on-site licensing inspections.
- b. MDHHS sometimes did not document its resolution for issues field analysts noted during foster home visits conducted in conjunction with its annual on-site inspection process. The field analyst inspection reports we reviewed included 98 issues related to the foster home visits. We noted for 20 (20%), a resolution of the issue was not documented in the analysts' inspection reports, nor was the issue included in MDHHS's final inspection report for the CPA. We noted many of these 20 issues related to CPA activities and services that likely would not have a direct impact on the health and safety of the foster children. For example, field analysts noted issues regarding the foster homes' overall level of satisfaction with the CPAs guidance and communication.

MDHHS retention policy required only the final inspection reports and corrective action plans be maintained in the licensing file. In addition, MDHHS informed us it had not developed a licensing policy manual to provide its licensing consultants guidance on what follow up and documentation are expected within final inspection reports for the issues identified by the field analysts during foster home visits.

RECOMMENDATION

We recommend that MDHHS improve its documentation of annual on-site CPA inspections.

**AGENCY
PRELIMINARY
RESPONSE**

MDHHS provided us with the following response:

MDHHS partially agrees.

MDHHS agrees that Michigan Compiled Laws require maintenance of records that are necessary for the adequate and proper recording of its activities and protection of the legal rights of the State; however, MDHHS asserts that the final reports completed by the consultant and analyst serve this purpose. There is no legal requirement to include the assessment tool. MDHHS will discuss whether DCWL policy and procedures should be updated to include retention of additional documentation.

MDHHS updated DCWL policy in May 2021 to require that DCWL field consultants review all field analyst findings during the exit conference meeting and verify that a resolution has been documented.

**AUDITOR'S
COMMENTS TO
AGENCY
PRELIMINARY
RESPONSE***

MDHHS's response indicates it only partially agrees with our recommendation because there is no specific legal requirement for MDHHS to retain its completed assessment tools. However, retaining these records would increase MDHHS's assurance the annual inspection activities consistently identify potential risks to foster children. Also, retaining them would enhance MDHHS's ability to support the corresponding conclusions and licensing decisions if subsequently questioned or challenged. Therefore, our recommendation remains unchanged.

* See glossary at end of report for definition.

FINDING 5

Analysis of CPA annual licensing inspection results is needed.

MDHHS had not developed formalized procedures to compile and analyze inspection results to identify significant trends in CPA activities and services.

MDHHS should improve its monitoring of CPAs by compiling and analyzing its CPA annual licensing inspection results to identify significant trends that may exist in CPA activities and services. Doing so would enhance MDHHS's ability to better detect and address prevalent issues, thereby improving CPA activities and services for children and families.

The *Michigan Compiled Laws* require MDHHS to perform annual on-site inspections to issue or renew a CPA's license if MDHHS is satisfied the CPA's services and facilities are conducive to the welfare of the children. During the annual on-site inspection process, MDHHS gathers extensive information regarding each CPA's activities and services and compliance with licensing rules, laws, MDHHS policy, and Implementation, Sustainability, and Exit Plan* (ISEP) requirements. The Child Welfare League of America's publication entitled *CWLA Standards of Excellence for Services for Abused or Neglected Children and Their Families* indicates child protection agencies should gather and analyze all information available, both internal and external, to assess the impact of their service delivery on children, families, and the community. In addition, sound monitoring practices would dictate using relevant and available information to help identify and address areas of needed improvement.

We compiled and analyzed MDHHS's annual licensing inspection reports from 2016 to 2018 for our 11 selected CPAs and identified trends in violations. For example, we noted all 11 continued to have one or more violations reported in all of the 3 annual inspections reviewed; there were violations consistently reported in one or more of 15 common compliance areas, such as foster child service plans, foster home special evaluations, and CPA personnel records; and the total number of noncompliance violations MDHHS reported for these 11 CPAs increased 21% from 2016 to 2018. By compiling and analyzing annual inspection results, MDHHS could more readily ascertain Statewide compliance trends existing in CPA activities and services and increase its effectiveness in:

- Detecting and addressing pervasive, systemic, persistent, and/or emerging Statewide issues in CPA activities and services.
- Developing training recommendations targeted toward addressing identified issues and improving CPA services provided to children.
- Identifying and efficiently sharing Statewide the best practices of CPAs with consistently favorable annual inspection results.

MDHHS informed us it relied on licensing consultants to identify trends in violations among the CPAs with each consultant responsible for monitoring and for providing any needed

* See glossary at end of report for definition.

technical assistance to their respective CPAs; however, MDHHS did not have policies and procedures for broader reaching reviews and actions.

RECOMMENDATION

We recommend that MDHHS improve its monitoring of CPAs by compiling and analyzing its CPA annual licensing inspection results to identify significant trends that may exist in CPA activities and services.

**AGENCY
PRELIMINARY
RESPONSE**

MDHHS provided us with the following response:

MDHHS agrees.

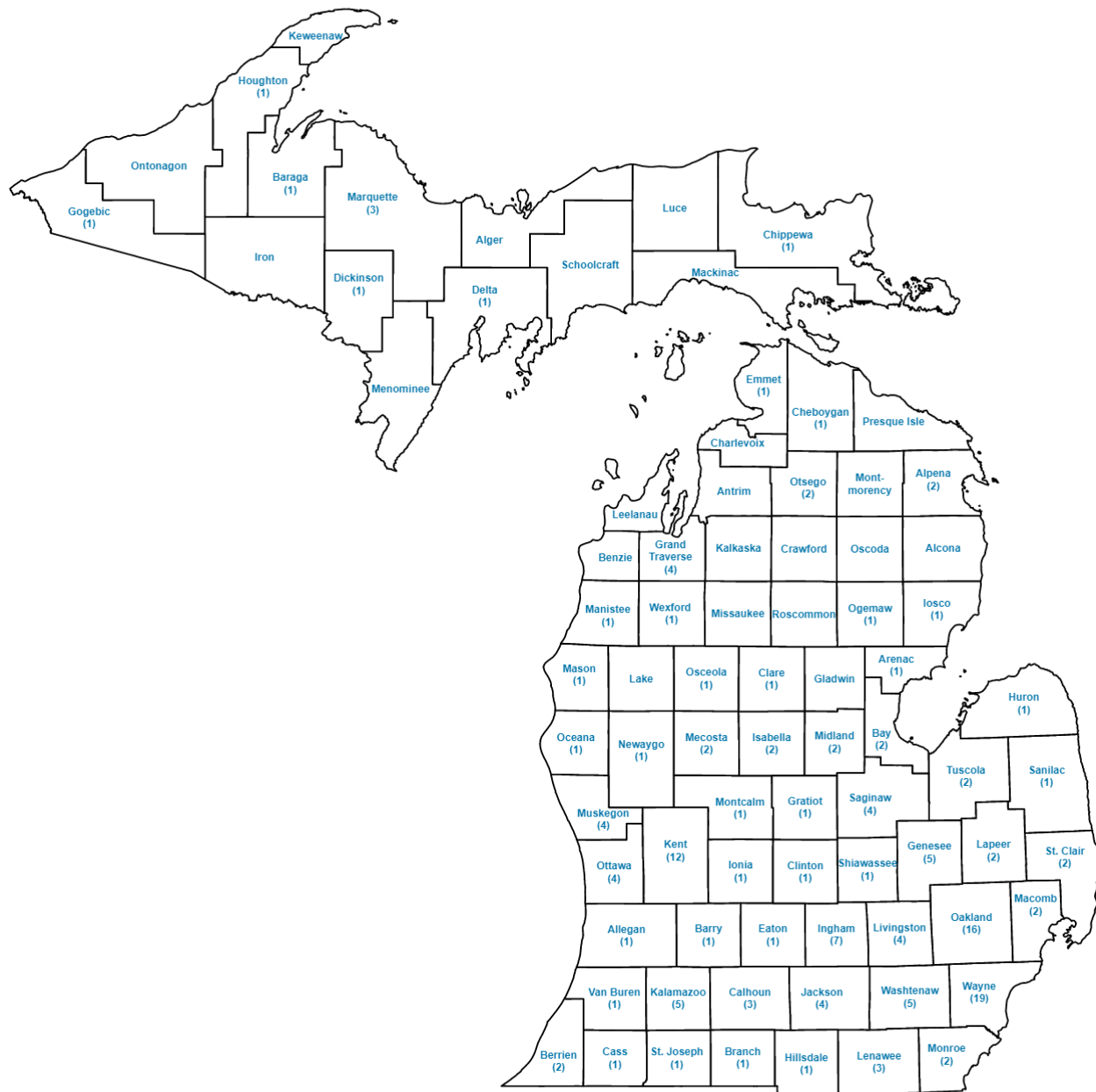
By January 2022, MDHHS will develop and implement guidance and/or procedures for licensing consultants to identify trends in violations, including an annual conference with area managers and licensing consultants to discuss current and repeat violation trends. The DCWL director will be notified of immediate safety concerns or recommendations of adverse action and provided a summary report that outlines the trends for final review.

SUPPLEMENTAL INFORMATION

UNAUDITED

SELECT LICENSING AND MONITORING ACTIVITIES OF CHILD PLACING AGENCIES Michigan Department of Health and Human Services

Licensed Child Placing Agency (CPA) Map
As of October 12, 2021



To view the interactive map, click here, <https://audgen.michigan.gov/431278016map.html>

Note: The number displayed in parentheses below the name of a county denotes the number of licensed CPAs located within that county. The counties with no licensed CPAs are served through licensed CPAs located in other counties.

Source: The OAG created the map using data from MDHHS.

AGENCY DESCRIPTION

MDHHS licenses and monitors CPAs in accordance with the Child Care Organizations Act (Sections 722.111 - 722.128 of the *Michigan Compiled Laws*) to help protect foster care and adoptive children. MDHHS's Division of Child Welfare Licensing* (DCWL) carries out these responsibilities by conducting annual on-site licensing inspections of CPAs to determine compliance with State law and licensing rules, providing technical assistance and consultation to improve the quality of CPA services, and investigating complaints alleging a CPA's violations of licensing rules or law.

Licensed CPAs monitored by MDHHS are MDHHS local county offices or private nonprofit organizations that receive children for placement in private family homes for foster care or adoption. Only the private nonprofit CPAs provide adoption services.

MDHHS's DCWL was appropriated \$7.2 million in fiscal year 2021 and had 59 full-time equated positions as of September 30, 2021 to carry out its licensing and monitoring functions. As of October 2021, there were approximately 160 licensed CPAs.

* See glossary at end of report for definition.

AUDIT SCOPE, METHODOLOGY, AND OTHER INFORMATION

AUDIT SCOPE

To examine the records and processes related to selected MDHHS CPA licensing and monitoring activities. We conducted this performance audit* in accordance with generally accepted government auditing standards. Those standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our audit objective and corresponding audit procedures were directed toward concluding on selected MDHHS activities related to licensing and monitoring and not directed toward concluding on each individual CPA's compliance with licensing requirements, MDHHS's activities related to its monitoring of child welfare compliance in accordance with ISEP, or MDHHS's monitoring of court operated or non-MDHHS government CPAs.

We concluded that child welfare data extracted from MiSACWIS was of undetermined reliability. In February 2019, an independent assessment of MiSACWIS and MDHHS's child welfare data reporting infrastructure found persistent and significant defects stemming from a flawed MiSACWIS design and initial roll-out. These issues generated an unmanageable backlog of defects, incidents, and data fixes that were likely to persist indefinitely, inhibit effective casework, contribute to data entry errors, negatively affect outcomes for children and families, and impact MDHHS's ability to collect and report accurate and timely data for both the court-appointed federal monitors and field staff. We extracted certain MiSACWIS child welfare data for our audit and performed data-set verification procedures, as applicable. Our procedures did not identify significant issues. Therefore, although the independent assessment concluded MiSACWIS child welfare data was of undetermined reliability, based on our verification procedures, we concluded the data we used to conduct our audit work was the best available source of child welfare data and it provided sufficient evidence to support our applicable audit findings, conclusions, and recommendations.

Generally accepted government auditing standards require us to report significant constraints imposed upon the audit approach. MDHHS initially denied our access to closed adoption records citing disagreement regarding the OAG's legal authority to view the information, resulting in a lengthy litigation process. Consequently, we experienced an almost 2-year-long delay in MDHHS providing us appropriate access to the closed adoption records sampled for our auditing procedures.

* See glossary at end of report for definition.

This delay hindered our efforts to timely complete our planned auditing procedures and necessitated additional procedures to conclude on our audit objective.

PERIOD

Our audit procedures, which included a preliminary survey, audit fieldwork, report preparation, analysis of agency responses, and quality assurance, generally covered April 1, 2015 through March 31, 2017; however, additional testing of selected attributes related to MDHHS's licensing and monitoring of CPAs covered October 1, 2018 through March 31, 2019.

METHODOLOGY

We conducted a preliminary survey to gain an understanding and assess potential risk areas for review in MDHHS's processes to license and monitor CPAs in order to establish our audit objectives, scope, and methodology.

During our preliminary survey, we:

- Reviewed applicable licensing rules, laws, and MDHHS policies and CPA contract provisions.
- Interviewed MDHHS and CPA management and staff to obtain an understanding of CPA licensing and monitoring responsibilities, processes and procedures, and application of select licensing rules, laws, and MDHHS policies.
- Performed site visits and conducted preliminary testing at 2 selected CPAs related to MDHHS's CPA licensing and monitoring processes.
- Observed MDHHS staff conducting an annual on-site CPA licensing inspection and licensing procedures for a CPA evaluated foster home to gain an understanding of those processes.
- Compared MDHHS inspection assessment tools with laws, licensing rules, CPA contract provisions, and MDHHS policies to assess whether the tools were comprehensive and addressed CPA services that impact child health and safety.
- Performed a limited review of MDHHS's documentation for select CPA annual licensing inspections, special investigations, and the related corrective action plans to determine the timeliness of the processes and compliance with MDHHS's procedures.

OBJECTIVE

To determine the effectiveness of selected MDHHS activities to license and monitor child placing agencies and services.

To accomplish this objective, we:

- Analyzed BITS data related to the 358 annual licensing inspections occurring from April 1, 2015 to March 31, 2017 to determine whether MDHHS completed timely annual inspections.
- Judgmentally selected 11 of approximately 170 CPAs active during fiscal year 2016 and reviewed MDHHS's records and CPA files, as applicable, to assess MDHHS's CPA licensing and monitoring processes and procedures.

We performed the following:

- Reviewed annual licensing inspection reports to assess whether MDHHS had completed annual inspections for the selected CPAs and identified in its reports whether the CPA complied with applicable requirements.
- Assessed MDHHS's retention of the licensing consultant's completed assessment tools and the field analyst's foster home visit reports.
- Developed a list of the children assigned to each CPA using MiSACWIS data and compared each list with the CPA's provided roster of children to assess completeness of the information used by MDHHS for its annual licensing inspection process.
- Reviewed field analyst reports and supporting documentation to ensure MDHHS conducted foster home visits for its sampled foster home providers.
- Traced foster home visit issues identified in field analyst reports to the applicable licensing consultant's inspection report to evaluate the completeness of the information communicated to the CPAs for corrective action, as applicable.
- Analyzed the CPAs' corrective action plans to ensure MDHHS had timely received and reviewed the plans and documented follow-up in its subsequent inspections of the CPAs.
- Examined a judgmental selection of 55 CPA employee files during our on-site procedures, occurring between September 2016 and March 2017, to determine whether MDHHS ensured the CPA completed required background checks for the selected employees and the selected

employees met applicable education and training requirements.

Because of our judgmental sample selection, we could not project our results into the entire population.

- Conducted independent MSP criminal history record and MDHHS Central Registry checks for 48 selected CPA employees as of the dates of our on-site visits, occurring between September 2016 and March 2017, to ensure they were suitable for employment, as of the date of our checks.
- Reviewed a random sample of 48 of the 2,737 individuals with identified criminal history during the audit period in BITS to determine whether MDHHS assessed good moral character offenses, as applicable. We used random sampling to eliminate any bias and enable us to project the results to the entire population.
- Judgmentally and randomly selected 137 of the 2,438 foster children assigned to the 11 judgmentally selected CPAs, from April 2015 through November 2016 and October 2018 through March 2019, and reviewed the applicable CPA file and MiSACWIS information. In addition to the child file information, we reviewed the CPA's associated licensed foster home, unlicensed relative foster home, and/or adoptive home information, as applicable, for select requirements. We analyzed our results to assess whether MDHHS's inspection results were generally consistent with our review for selected CPA service requirements, as applicable.

For the 137 selected foster children, we:

- Reviewed related service plans to determine whether the CPA completed and signed the plans in a timely manner and retained the plans.
- Examined parent-agency treatment plans* to confirm the CPA had documented the plans and obtained the required signatures.
- Determined whether the CPA properly documented family team meetings*; announced and/or unannounced worker visits with the child, foster parents, and biological parents; parenting time; sibling* visits; sibling splits and efforts to combine siblings; change of the child's placement; the child's education information; and the child's medical passport* and required health care services.

* See glossary at end of report for definition.

- Compiled a list of 387 adults the CPAs' files identified resided in the associated licensed foster homes, unlicensed relative foster homes, and adoptive homes for the 137 selected children and conducted independent MSP criminal history record and MDHHS Central Registry checks for the 387 individuals to ensure the homes were suitable for child placement, as of the date of our checks.

For the 106 associated licensed foster homes, we:

- Inspected foster parent and agency agreements* to determine whether the CPA appropriately completed and signed the plans in a timely manner and retained the agreements.
- Evaluated whether the CPA properly documented foster parent training completion, home evaluations, foster home applications and supporting information, background check evaluations, and home evaluation corrective action plans.

For the 32 associated unlicensed relative foster homes, we:

- Reviewed home studies, safety screenings, and relative licensure waivers, to determine whether the CPA documented these in a timely manner.
- Determined whether the CPA properly documented completion of training and background check evaluations.

For the 77 associated adoptive homes, we:

- Reviewed adoptive home assessments and adoption worker case assignments to determine whether the CPA documented these occurred in a timely manner.
- Determined whether the CPA properly documented adoption applications, adoptive parent training, child adoption assessments, quarterly adoption progress reports*, background checks performed, adoptive home visits, relative searches, child meetings, denial of adoption, and postings to Michigan Adoption Resource Exchange* records.

Our random samples were selected to eliminate bias; however, we could not project our results into the entire

* See glossary at end of report for definition.

population because we judgmentally selected 11 CPAs that met specified criteria. Also, the results from our judgmentally selected children and their associated providers could not be projected to the respective populations.

- Assessed MDHHS's process to ensure CPAs adequately secured finalized adoption records, and we:
 - Observed physical storage of finalized adoption records at MDHHS central office and on-site at the 11 judgmentally selected CPAs.
 - Analyzed MDHHS data for 35 finalized adoptions from our selected CPA child files to determine whether the CPAs timely restricted MiSACWIS access to the adoption records and had submitted hard-copy adoption records to MDHHS central office for permanent retention.
- Analyzed MDHHS's inspection report findings from 2016 to 2018 for the 11 judgmentally selected CPAs to identify potential recurrent issues and trends in noncompliance.
- Evaluated BITS data for 275 special investigations of complaints against CPAs between April 1, 2015 and March 31, 2017 to determine whether MDHHS timely initiated and completed the investigations. In addition, we randomly selected 26 of the investigations and reviewed MDHHS's hard-copy files to determine whether it:
 - Documented its investigation efforts and conclusions.
 - Received required corrective action plans from the CPAs that contained all required elements.

We used random sampling to eliminate any bias and enable us to project results to the entire population.

- Analyzed BITS data for the 4,112 CPA special evaluations of foster homes initiated between April 1, 2015 and March 31, 2017 to determine whether MDHHS ensured the CPAs completed timely evaluations of the complaints against the foster homes.

CONCLUSIONS

We base our conclusions on our audit efforts and any resulting material conditions or reportable conditions.

When selecting activities or programs for audit, we direct our efforts based on risk and opportunities to improve State government operations. Consequently, we prepare our performance audit reports on an exception basis.

**AGENCY
RESPONSES**

Our audit report contains 5 findings and 5 corresponding recommendations. MDHHS's preliminary response indicates it partially agrees with 1 recommendation and agrees with 4 recommendations.

The agency preliminary response following each recommendation in our report was taken from the agency's written comments and oral discussion at the end of our fieldwork. Section 18.1462 of the *Michigan Compiled Laws* and the State of Michigan Financial Management Guide (Part VII, Chapter 4, Section 100) require an audited agency to develop a plan to comply with the recommendations and to submit it to the State Budget Office upon completion of an audit. Within 30 days of receipt, the Office of Internal Audit Services, State Budget Office, is required to review the plan and either accept the plan as final or contact the agency to take additional steps to finalize the plan.

**SUPPLEMENTAL
INFORMATION**

Our audit report includes a licensed CPA map, presented as supplemental information. Our audit was not directed toward expressing a conclusion on this information.

GLOSSARY OF ABBREVIATIONS AND TERMS

administrative review	Evaluations performed by DCWL when a CPA receives notice that a CPA employee, foster or adoptive parent, or adult household member has been convicted of a crime inconsistent with good moral character principles.
adoption	The permanent placement of a child.
adoption code	The Michigan adoption code, chapter X of the probate code of 1939, Public Act 288 of 1939, Sections 710.21 - 710.70 of the <i>Michigan Compiled Laws</i> .
adoptive parent	The parent or parents who adopt a child in accordance with the adoption code.
adult household member	Any person aged 18 or older who resides in a foster or adoptive home on an ongoing or recurrent basis.
AGAO	Adoption and Guardianship Assistance Office.
assessment tool	Forms used by MDHHS licensing consultants to conduct inspections or develop notes on special investigations as a basis for formal reports issued to the CPA.
auditor's comments to agency preliminary response	Comments the OAG includes in an audit report to comply with <i>Government Auditing Standards</i> . Auditors are required to evaluate the validity of the audited entity's response when it is inconsistent or in conflict with the findings, conclusions, or recommendations. If the auditors disagree with the response, they should explain in the report their reasons for disagreement.
Bureau Information Tracking System (BITS)	MDHHS system used to track CPA and foster home licenses and licensing inspections, CPA special evaluations, foster home special evaluations, and background checks of licensed foster homes, adoptive parents, and CPA administrators.
Central Registry	The system maintained at MDHHS that is used to keep a record of all reports filed with MDHHS under the Child Protection Law in which relevant and accurate evidence of child abuse and/or neglect is found to exist. The Central Registry is not publicly searchable.
child(ren)	A person(s) under 18 years of age.

child abuse	Harm or threatened harm to a child's health or welfare that occurs through nonaccidental physical or mental injury, sexual abuse, sexual exploitation, or maltreatment by a parent, a legal guardian, or any other person responsible for the child's health or welfare or by a teacher, a teacher's aide, or member of the clergy.
child care organization	A governmental or nongovernmental organization having as its principal function receiving minor children for care, maintenance, training, and supervision, notwithstanding that education instruction may be given. Child care organization includes organizations commonly described as child caring institutions, CPAs, children's camps, children's campsites, children's therapeutic group homes, child care centers, day care centers, nursery schools, parent cooperative preschools, foster homes, group homes, or child care homes.
child neglect	<p>Harm or threatened harm to a child's health or welfare by a parent, a legal guardian, or any other person responsible for the child's health or welfare that occurs through either of the following:</p> <ul style="list-style-type: none"> (i) Negligent treatment, including the failure to provide adequate food, clothing, shelter, or medical care. (ii) Placing a child at an unreasonable risk to the child's health or welfare by failure of the parent, legal guardian, or other person responsible for the child's health or welfare to intervene to eliminate that risk when that person is able to do so and has, or should have, knowledge of the risk.
child placing agency (CPA)	A governmental organization or private nonprofit agency organized for the purpose of receiving children for their placement in private family homes for foster care or for adoption. The function of a child placing agency may include investigating applicants for adoption and investigating and certifying foster family homes and foster family group homes. The function of a child placing agency may also include the supervision of children who are 16 to 21 years of age and who are living in unlicensed residences.
Children's Rights	A national advocacy group focused on reforming child welfare systems.
complaint	Written or verbal communication to MDHHS of an allegation of CPA or foster home noncompliance.
Division of Child Welfare Licensing (DCWL)	Licenses and monitors child caring institutions, court-operated facilities and CPAs, including foster family homes and foster family group homes.

effectiveness	Success in achieving mission and goals.
family team meeting	A deliberate and structured approach to involving youth, families, and caregivers in case planning through a facilitated meeting of families and their identified supports.
field analyst	MDHHS employee who inspects foster homes and conducts interviews with the foster family to assess child safety.
foster care	24-hour substitute care for children placed away from their parents or guardians and for whom MDHHS has placement and care responsibility.
foster family group home	The private home of an individual who has been licensed by MDHHS to provide 24-hour care for more than four but fewer than seven minor children who are placed away from their parent, legal guardian, or legal custodian in foster care.
foster family home	The private home of an individual who is licensed to provide 24-hour care for one but not more than four minor children who are placed away from their parent, legal guardian, or legal custodian in foster care.
foster home	Foster family home or foster family group home.
foster parent and agency agreement	Written agreement signed by the foster parent and the CPA that contains the responsibilities of the agency; the services to be provided to foster children and the foster family; the responsibilities of the foster family; and documentation the foster family has been informed of, and agrees to follow, agency policies and procedures.
good moral character	When used as a requirement to establish or operate an organization or facility regulated by the State in the <i>Michigan Compiled Laws</i> or administrative rules promulgated under those laws, the propensity on the part of the person to serve the public in the licensed area in a fair, honest, and open manner.
Implementation, Sustainability, and Exit Plan (ISEP)	The agreement that supersedes and replaces the July 18, 2011, Modified Settlement Agreement and Consent Order.
Internet Criminal History Access Tool (ICHAT)	Michigan criminal history record database that is updated daily with Michigan felony and misdemeanor conviction information.

licensee	A person, partnership, firm, corporation, association, nongovernmental organization, or local or State government child care organization that has been issued a license to operate a child care organization.
licensing consultant	Employees who perform professional assignments to ensure CPAs are administered in compliance with licensing rules, laws, and MDHHS policies; monitor contract compliance for private CPAs and child caring institutions; and provide technical expertise and guidance to facility administrators to improve programs and services.
material condition	A matter that, in the auditor's judgment, is more severe than a reportable condition and could impair the ability of management to operate a program in an effective and efficient manner and/or could adversely affect the judgment of an interested person concerning the effectiveness and efficiency of the program. Our assessment of the materiality is in relation to the respective audit objective.
MDHHS	Michigan Department of Health and Human Services.
medical passport	A document developed by CPAs for each child who comes under their care, which contains all medical information required by policy or law to be provided to foster parents; basic medical history; a record of all immunizations; and any other information concerning the child's physical and mental health, including information that the child may be a victim of human trafficking.
Michigan Adoption Resource Exchange	A Statewide information and referral service for families interested in adopting children from foster care and for adoption workers looking for homes for these children.
MiSACWIS	Michigan Statewide Automated Child Welfare Information System.
Modified Settlement Agreement and Consent Order	The resulting agreement from a lawsuit filed by the New York-based Children's Rights in which Michigan's child welfare system came under federal oversight in 2008. Michigan renegotiated the original agreement resulting in the modified settlement agreement that took effect on July 18, 2011.
MSP	Michigan Department of State Police.
Office of the Children's Ombudsman (OCO)	An independent State agency created by Public Act 204 of 1994 that investigates complaints and child deaths, advocates for children, and recommends ways to improve the child welfare

system. OCO investigates complaints from individuals who allege that MDHHS and/or a private agency violated law or policy or made decisions harmful to a child's health and/or safety. OCO also investigates child death cases that may involve abuse or neglect.

parent-agency treatment plan

Provides information on services and the specific goals for the parent(s)/legal guardian(s), child(ren), foster parents/caregivers, and foster care worker.

performance audit

An audit that provides findings or conclusions based on an evaluation of sufficient, appropriate evidence against criteria. Performance audits provide objective analysis to assist management and those charged with governance and oversight in using the information to improve program performance and operations, reduce costs, facilitate decision-making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.

quarterly adoption progress reports

MDHHS report on the status of a child's placement for adoption, which includes dates of contacts, dates and types of recruitment activities, progress toward achieving adoption, barriers to achieving adoption and specific action steps to overcome the barriers, and projected date for finalizing the adoption.

reportable condition

A matter that, in the auditor's judgment, is less severe than a material condition and falls within any of the following categories: an opportunity for improvement within the context of the audit objectives; a deficiency in internal control that is significant within the context of the audit objectives; all instances of fraud; illegal acts unless they are inconsequential within the context of the audit objectives; significant violations of provisions of contracts or grant agreements; and significant abuse that has occurred or is likely to have occurred.

sampling

The act, process, or technique of selecting a suitable sample.

service plan

The plan developed by a CPA that includes services to be provided by and responsibilities and obligations of the agency and activities, responsibilities, and obligations of the parent.

sibling

A child who is related through birth or adoption by at least 1 common parent.

special evaluation

An investigation conducted by a CPA of a licensed foster home upon receipt of information that relates to possible noncompliance with any foster home rule.

special investigation

A review conducted by a DCWL licensing consultants in response to a complaint against a CPA.

unlicensed relative foster home

Adults declining to be licensed or not recommended for a license that are providing foster care and are related to the child in foster care by blood, marriage, or adoption as grand-parent, great-grandparent, great-great-grandparent, aunt or uncle, great-aunt or great-uncle, great-great-aunt or great-great-uncle, sibling, stepsibling, nephew or niece, first cousin or first cousin once removed, and the spouse of any of the above, even after the marriage has ended by death or divorce.



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