



STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

GRETCHEN WHITMER
GOVERNOR

ELIZABETH HERTEL
DIRECTOR

June 16, 2022

Rick Lowe, Chief Internal Auditor
Office of Internal Audit Services
111 South Capitol Avenue
8th Floor, Romney Building
Lansing, Michigan 48933

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 2018 Child Welfare Caseloads.

Questions regarding the summary table or corrective action plans should be directed to me at 517-241-4237 or MyersP3@michigan.gov.

Sincerely,

Pam Myers

Pam Myers, Director
Bureau of Audit

PM:wb

Enclosure (1)

c: Office of the Auditor General
House Fiscal Agency
Senate Fiscal Agency
Executive Office
DHHS, David Knezek
DHHS, Amy Epkey

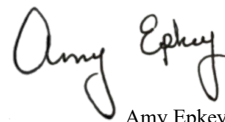
House Appropriations Committee
House Standing Committee
Senate Appropriations Committee
Senate Standing Committee
DHHS, Lewis Roubal

PERFORMANCE AUDIT OF 2018 OAG CHILD
WELFARE CASELOADS

DEPARTMENT OF HEALTH AND HUMAN
SERVICES

AUDIT RESPONSE

Approved:



Amy Epkey, Senior Deputy Director
Financial Operations Administration
Department of Health and Human Services

Date: June 15, 2022



AUDIT REPORT SUMMARY

DEPARTMENT: Children's Services Administration

AUDIT PERIOD: March 1, 2017 through August 31, 2018

REPORT DATED: June 16, 2021

DISPOSITION OF AUDIT RECOMMENDATIONS

CITATIONS COMPLIED WITH	CITATIONS TO BE COMPLIED WITH	CITATIONS DHHS DID NOT AGREE WITH
		Finding 1
		Finding 2
Finding 3 (March 2022)		
	Finding 4 (July 2022)	

Audit Response
Performance Audit
2018 OAG Child Welfare Caseloads
Department of Health and Human Services
March 1, 2017 through August 31, 2018

Recommendation 1: Improvement needed to ensure that local child welfare agencies consistently carry out necessary and timely corrective actions for identified caseload issues.

We recommend that MDHHS's central office require local agencies to provide MDHHS's central office the agency's planned and/or completed corrective action(s) to address the caseload noncompliance issues that are identified in MDHHS's weekly caseload compliance reports.

Response

MDHHS disagrees.

MDHHS's weekly caseload count report process does not include formal procedures for agencies to report all compliance issues or actions taken to central office. Business Service Center (BSC) and Division of Continuous Quality Improvement (DCQI) analysts send weekly caseload reports to all agencies and work independently with each agency as needed. Each BSC and agency has their own extensive practices to address compliance issues and ensure that action is taken to mitigate any identified concerns.

Informal communication between local agencies and the Data Management Unit (DMU) also occurs to troubleshoot compliance issues. This communication often includes recommendations or suggestions to resolve issues based on effective regional and local practices.

MiSACWIS case assignments are managed at a local level. At times, cases may unintentionally become improperly assigned, resulting in a case appearing in MiSACWIS without a primary caseworker. A MiSACWIS case without a primary caseworker does not necessarily mean that services and case management activities are not occurring. Understanding the importance of ensuring every case always has a primary caseworker, case assignment design and functionality will be an area of focus in the development of the new Comprehensive Child Welfare Information System (CCWIS).

MDHHS is committed to ensuring manageable and compliant caseloads for child welfare staff to ensure that children and families receive the support and services they need to promote child safety, well-being, and permanency. The current methodology for caseload oversight and monitoring of compliance utilizes a shared responsibility of the MDHHS' Children's Services Agency, along with regional BSCs, local offices, and private agencies and has enabled MDHHS to officially report overall caseload compliance ranging from 95.6% to 95.9%, with an average performance of 95.8%, to the federal monitors. Caseload data is verified for the federal lawsuit by the department, utilizing the University of Michigan, and the monitors of Michigan's lawsuit.

To further support MDHHS's efforts around caseload compliance, caseload details are communicated to the executive director of the Children's Services Agency (CSA) within a weekly director's report. The executive director reviews the report for overall compliance.

Recommendation 2: Improvement needed to ensure that secondary and courtesy case assignments are included in the monitoring of child welfare staff caseloads.

We recommend that MDHHS's central office include secondary and courtesy case assignments in its monitoring of child welfare staff caseloads.

Response

MDHHS disagrees.

MDHHS agrees that secondary and courtesy assignment types are not captured in weekly caseload reports. Caseload reporting was negotiated and agreed upon with the federal monitors and it was determined that primary caseload assignments would be the only assignments measured.

However, secondary assignments are used for a variety of business reasons that do not constitute full case responsibility, typically for ancillary support.

Examples include:

- For administrative purposes, i.e. assigning a primary caseworker and/or supervisor to the case, entering criminal history information, etc.
- Additional support for new workers in training.
- To allow another worker within the same county to enter a contact, document, etc. to the case record in MiSACWIS.
- Pending adjudication, a CPS investigator may be assigned secondary for immediate access to the case for court purposes.
- Temporary coverage for short-term annual leave or unexpected sick leave.
- For completion of forms, such as the DHS-588 or DHS-3130-A.
- To conduct a special evaluation that may occur or is occurring.
- Enhanced Foster Care (EFC), to provide additional support to the primary caseworker.
- Pending enrollment for licensure.
- Placement assistance.
- Intake workers who provide additional support to the primary caseworker, as determined by the agency.

It would not be meaningful to track and monitor secondary assignment types centrally as secondary assignments are managed at a local level based on local practices and operational need. Local offices have better insight into the various complexities of workloads and case specific needs, allowing them to manage secondary assignments more effectively.

Courtesy assignments are essential from a logistical and case management standpoint and occur primarily in CPS cases, as demonstrated by the OAG's survey. Because courtesy assignments are reciprocal, it is anticipated that each county will receive, and issue, generally equitable numbers of courtesy requests, therefore creating a fair distribution to both receiving and issuing counties. MDHHS conducted an impact analysis to evaluate the use and distribution of courtesy assignments across Michigan. Field offices recorded courtesy case requests and the county requesting assistance for one month (September 2021). MDHHS assessed the data and confirmed that courtesy case assignments are distributed as intended and further oversight specific to courtesy assignments is not needed.

Recommendation 3: Improved monitoring needed to address the risk that case assignments could be moved between caseworkers solely to enhance caseload compliance rates on designated count days.

We recommend that MDHHS's central office periodically analyze the movement of case assignments to address the risk that assignments are temporarily moved between caseworkers solely to improve caseload compliance rates on count days.

Response

During Implementation, Sustainability, and Exit Plan (ISEP) reporting periods 12 and 13, the Michigan Monitoring Team (MMT) conducted an in-depth review of allegations of caseload manipulation by MDHHS supervisors and staff. The MMT reported, "Based on interviews with hundreds of staff and supervisors in Michigan, and data analysis involving thousands of cases across ten counties, focused primarily on public sector caseload compliance, the monitoring team concludes the caseload data and information provided by the Department accurately reflects DHHS' performance."

To ensure there are no residual issues in this area, MDHHS conducted a thorough analysis of the movement of cases around a select number of official caseload case days and determined that the percentage of cases that are moved from one worker to another prior to an official count and then moved back to the original worker after the count is complete is less than 1% and does not require further resource or ongoing periodic analysis.

Since the issuance of the OAG's survey in October 2018, MDHHS has also made considerable improvements in overall caseload compliance and communication. Caseload compliance reports are generated weekly to identify areas of improvement and communicated to all field staff and executives.

Recommendation 4: Improved Statewide caseload compliance trend analyses needed.

We recommend that MDHHS's central office strengthen its process for analyzing Statewide caseload compliance trends.

Response

MDHHS is committed to ensuring manageable and compliant caseloads for child welfare staff to ensure that children and families receive the support and services they need to promote child safety, well-being, and permanency. Overall statewide caseload compliance has been between 96.6% and 98.0% from January 2021 to October 2021.

MDHHS is in the process of testing a caseload/saturation rate report that will assist field staff and CSA management teams in analyzing statewide caseload compliance trends. MDHHS is also working to develop a caseload compliance report that would be available on SharePoint for all staff and anticipates completion by July 2022. In addition, MDHHS promoted compliance reviews in local offices during the September monthly child welfare supervisory teleconference and will continue to provide compliance updates as issues arise

The department will continue to strengthen its processes for analyzing caseload data around areas of noncompliance. However, any future in-depth analysis may continue to be handled at the regional or local level.