



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ELIZABETH HERTEL
DIRECTOR

October 4, 2024

Rick Lowe, Chief Internal Auditor
State Budget Office
Office of Internal Audit Services
111 S. Capitol Avenue
7th Floor, Romney Building
Lansing, Michigan 48933

Dear Mr. Lowe:

In accordance with the State of Michigan, [Financial Management Guide, Part VII](#), enclosed is our final corrective action plan to address recommendations contained within the OAG follow-up report of Children's Protective Services Investigations.

All legislative inquiries should be directed to Chardae Burton, MDHHS Director of Legislative Affairs, at burtonc5@michigan.gov. All other questions regarding the corrective action plan should be directed to me at havenss2@michigan.gov.

Sincerely,

Shannah Havens, CPA, MBA
Director, Bureau of Audit

Enclosure (1)

c: Executive Office
Office of the Auditor General
House and Senate Fiscal Agencies
House Ethics and Oversight Committee and Senate Oversight Committee
House and Senate Appropriations Subcommittees on MDHHS
House Families, Children and Seniors Committee
Senate Housing and Human Services Committee
David Knezek, MDHHS, Chief Operating Officer
Amy Epkey, MDHHS, Senior Deputy Director, Financial Operations Administration
Chardae Burton, MDHHS, Director, Legislative Affairs
Demetrius Starling, MDHHS, Senior Deputy Director, Children's Services Administration
Laura Blodgett, MDHHS, Senior Deputy Director, Communications Administration

Michigan Department of Health and Human Services
Children’s Protective Services Investigations
431-1285-16F
Issued 7/9/2024
Department Final Corrective Action Plan

Summary Response Matrix

	Complied	Will Comply	Partially Complied	Will Not Comply
Agrees	Finding 9 Finding 10 Finding 14 Finding 16 Finding 20 Finding 24	Finding 13		
Partially Agrees				
Disagrees			Finding 1 Finding 2 Finding 3 Finding 4 Finding 5 Finding 6 Finding 8 Finding 17 Finding 21	Finding 18

Final Corrective Action Plan (CAP)

Finding Number 1

Finding Title: Improvement needed to ensure that investigations are commenced in a timely manner.

Department Response

MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should remain a material condition, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)
See our complete Auditor's Comments on pages 62 and 63 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a material condition remains.

Finding Number 2

Finding Title: Considerable improvement needed in documentation of Central Registry Clearances.

Department Response
MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should remain a material condition, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)
See our complete Auditor's Comments on page 64 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a material condition remains.

Finding Number 3

Finding Title: Considerable improvement needed in completion of required criminal history checks.

Department Response
MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should remain a material condition, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)
See our complete Auditor's Comments on pages 65 and 66 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a material condition remains.

Finding Number 4

Finding Title: Documentation of a complete review of CPS history for family and household members needed.

Department Response
MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should remain a material condition, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)
See our complete Auditor's Comments on page 67 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a material condition remains.

Finding Number 5

Finding Title: Significant improvement needed in the documentation of communication with mandated reporters.

Department Response
MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should remain a material condition, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)
See our complete Auditor's Comments on page 68 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a material condition remains.

Finding Number 6

Finding Title: Improvement needed in completing timely face-to-face contact with alleged child victims.

Department Response

MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should remain a material condition, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)

See our complete Auditor's Comments on page 69 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a reportable condition remains.

Finding Number 8

Finding Title: Documentation of safety planning at initial contact with family and completion, accuracy, and timeliness of safety assessments need improvement.

Department Response

MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should remain a material condition, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)

See our complete Auditor's Comments on pages 70 and 71 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a material condition remains.

Finding Number 13

Finding Title: Significant improvement needed to ensure accurate assessment of the risk of future harm to children.

Department Response

MDHHS has implemented a number of strategies to increase risk assessment accuracy. MDHHS recognizes that our Children’s Protective Services employees have been asked to use antiquated tools and technology to solve problems. MDHHS recently requested a \$12 million appropriation from the Legislature to take another step toward implementation of our new electronic case management system, the Comprehensive Child Welfare Information System, commonly known as CCWIS. This appropriation will allow us to revise the department’s current risk assessment to improve accuracy, consistency, and equity in outcomes and service provision. Additionally, after several years of working with legislative partners, MDHHS accomplished a statutory change that took effect November 1, 2022. This change removed the current risk assessment as a consideration in determining the placement of someone on the child abuse and neglect Central Registry. This legislative action was necessary to allow the department to move forward with revising the risk assessment tool to address potentially subjective and ambiguous language that could result in inconsistent interpretation of the tool, among other opportunities. In conjunction with the above efforts, MDHHS will continue to

provide interim guidance and training to staff to ensure risk is accurately assessed and addressed.

Finding Number 17

Finding Title: Significant improvement needed in timely completion of CPS investigations.

Department Response

MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should remain a material condition, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)
See our complete Auditor's Comments on pages 72 and 73 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a material condition remains.

Finding Number 18

Finding Title: Monitoring of families' participation in post-investigative services needed for all Category III investigations.

Department Response

MDHHS disagrees with the follow-up conclusion, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)
See our complete Auditor's Comments on page 74 of the [audit report](#). There we reinforce and clarify our conclusion.

Finding Number 21

Finding Title: The notification process to inform individuals whose names MDHHS adds to the Central Registry needs significant improvement.

Department Response

MDHHS disagrees that compliance with the prior audit recommendations was not achieved and disagrees that the finding should be a reportable condition because MDHHS fully complied, refer to the department’s response in report 431-1285-16F.

Comment on CAP from Michigan Office of the Auditor General (03/12/2025, 1:00 PM)
See our complete Auditor's Comments on page 76 of the [audit report](#). There we reinforce why we concluded MDHHS partially complied, and a reportable condition remains.