Waiver Application

I. Executive Summary – Michigan Child Support Navigator Pilot

Pursuant to the requirements of Sections 1115 of the Social Security Act [42 U.S.C. 1315], entitled Demonstration Projects, the Michigan Office of Child Support (OCS) is requesting a waiver of compliance with Section 454 [42 U.S.C. 654] and Section 455 [42 U.S.C. 655] in order to permit the reimbursement of costs associated with a pilot project which would not otherwise be included as permissible under the Act or previously authorized based on the state's approved Title IV-D plan. Specifically, we ask for waivers to: (1) Allow the demonstration to operate in specific jurisdictions by waiving the state wideness requirement; (2) Allow for use of private funds for the state match pursuant to Code of Federal Regulations Title 2, Subtitle A, Chapter II, Part 200, Subpart D, §200.306.

The purpose of this waiver request is to develop, implement, and evaluate a pilot program that aids custodial and non-custodial parents and non-parent custodians in navigating the child support system. The current proposal emerged from the 2021 recommendations of the Michigan OCS Community Advisory Council. The purpose of the current pilot project is to analyze the effect of navigators on awareness, understanding, access, and use of child support services among parents and non-parent custodians in three Michigan counties (Calhoun, Genesee, and Kent). The overarching goal is to evaluate the feasibility and potential effectiveness of scaling up the program statewide to reduce systemic inequities that contribute to disparities in child support debt and barriers to information and access to program resources.

In service of this goal, OCS will provide navigator services by leveraging funding from the W. K. Kellogg Foundation. Child support navigators will serve as a bridge between participants and Friend of the Court, Prosecuting Attorney, and community service organizations. Navigators will engage in a range of activities including providing relevant IV-D program information, facilitating access to IV-D related information including forms, online portals, conducting outreach to community service organizations, and collaborating with child support program partners to develop informational workshops. OCS and local agencies will consult with lived experience experts to review and determine the final set of navigator services. In Genesee and Kent Counties, OCS will contract with local agencies with demonstrated experience offering family support services. In Calhoun County, OCS will be partnering with Michigan Works to provide navigator services. Michigan Works was selected due to its demonstrated success as a partner in the LEAP program.

The pilot project is expected to last for three years (2023-2026). The first year will be a planning year devoted to the start-up and development of the program design, while the second year will focus on implementation and service delivery. During the final year, the program will follow-up with parents and non-parent custodians who have participated in the program. To ensure objectivity, OCS will select an independent evaluator to conduct implementation and impact evaluation. The total amount of Section 1115 funds requested for this project is $1,400,000, which is the 66 percent federal match to the $700,000 received from W. K. Kellogg Foundation. We anticipate that approximately $108,858, plus the applicable match ($217,716), will be spent in 2023, with the bulk of spending in 2024, and final spending occurring in 2025.

II. Introduction and Background

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Michigan's child support program supports families by ensuring that children receive regular financial and medical support. As a result, child support is uniquely positioned to partner with parents to bolster families' financial wellbeing and enhance self-efficacy. However, according to the lived experiences of its participants, Michigan's child support program is often confusing and frustrating to navigate, and participants report a lack of access to resources explaining program processes and requirements. For most unmarried parents who do not live with their children, the first interaction with the child support program is being served with a lawsuit. In many of these cases, child support intervention is unwanted by the custodial parent. This introduction often contributes to adversarial co-parenting relationships and negative perceptions of the program. These issues are most salient among participants from systemically marginalized communities. Particularly for Black families in Michigan, negative perceptions of child support are compounded by disparities in child support debt, driven by racial wealth gaps and a dearth of family-sustaining employment opportunities. The program's role in recovering welfare costs has contributed to reluctance to engage, particularly among parents and non-parent custodians who are required to engage was a condition of receiving a public benefit. The potential benefits of child support services are overshadowed by the negative consequences of not meeting program requirements.

In a major step toward establishing child support as a more equitable, family-focused program, the Office of Child Support Community Advisory Council was created in early 2021. The Council gives intentional representation to systemically marginalized populations that have been under-represented in the child support policy decision-making process despite being over-represented in the child support population. Citing the critical need to enhance access to information and resources for child support participants, the Council has recommended that the program provide advocate and/or navigator services to assist families in better understanding the program and their rights and responsibilities. These recommendations, which are rooted in Council members lived experiences as program participants, are supported by research demonstrating that navigator services increase participation and improve outcomes for families. Specifically, parents who receive navigator services are more likely to say that they know where to seek support and feel more confident that they will get the resources they need. Navigator programs can also build trust between participants and program staff and result in greater participation.

These goals are in keeping with Michigan's previous and current efforts to work towards a more equitable and inclusive child support program, both within the state and nationally. In service of this priority, the Michigan child support program has undertaken various initiatives focused on increasing participants socio-economic wellbeing, on the policy and program levels. Recently, Michigan's child support program has expanded its pass-through policy to allow families receiving public assistance to receive a greater proportion of child support payments. In addition, the success of the Learn, Earn, and Provide (LEAP) project, a child support program focused on bolstering financial wellbeing through job placement and training, has led to an upcoming state-wide expansion. Michigan's child support program has also served as a co-lead on the Michigan Action Plan for Father Involvement, a statewide coalition. Finally, Michigan has introduced recent 2Gen initiatives focused on bolstering the entire family's wellbeing. Like these 2Gen initiatives, the benefits of the proposed project would extend to entire families: children, parents, and extended family and other caregivers. In an addendum to the waiver request, Michigan OCS will provide an analysis of the NCCSD survey findings in Michigan and describe how this pilot will address the needs highlighted in the survey.

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III. Program Goals and Objectives

Navigators will work within the scope of the IV-D program; navigators will not provide legal advice or provide court navigation. Navigators will conduct eligibility screenings and conduct initial assessments of participant needs. Using motivational interviewing, navigators will engage participants in collaborative goal setting and disseminate relevant IV-D-related information and resources including the IV-D procedural process, how to respond to requests for information, meetings, interviews, etc., web-based resources, and required next steps for case conferences. In preparation for meetings at the Friend of the Court and Prosecuting Attorney offices, navigators will assess for necessary accommodations and ensure that these are met. Navigators will connect and guide child support participants with relevant information and resources to make informed decisions, and make appropriate referrals as needed. In addition, navigators will assist participants in gathering, organizing, and preparing IV-D, FOC, and PA forms, packets, and other documents and facilitating access to printers and computers.

Navigators will conduct outreach to community organizations serving parents and non-parent custodial custodians, partnering with the local Friend of the Court and PA on their outreach efforts as appropriate. By establishing collaborative relationships with community-based organizations in each pilot county, navigators will serve as a bridge between participants and organizations providing services that help participants support their children and increase self-efficacy through their participation in the child support program. The scope of the navigator role does not include wraparound services or intensive case management. Navigators will maintain communication with existing community-based services to ensure that they are available and accessible during the contract period and assess for ongoing availability. In collaboration with the Friend of the Court and the Prosecuting Attorney, the navigator will informational sessions including individual and group sessions and workshops. To promote awareness and use of pilot services, navigators will disseminate program information using methods reviewed and approved by the local IV-D office and OCS. Throughout the course of the pilot, navigators will collect data needed for program evaluation and provide feedback to MDHHS and service providers based on aggregate data.

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IV. Waivers Requested

The Michigan Office of Child Support (OCS) is requesting a waiver of compliance with Section 454 [42 U.S.C. 654] and Section 455 [42 U.S.C. 655] in order to permit the reimbursement of costs associated with a pilot project. Specifically, we ask for waivers to: (1) Allow the demonstration to operate in specific jurisdictions by waiving the state wideness requirement; (2) Allow for use of private funds for the state match pursuant to Code of Federal Regulations Title 2, Subtitle A, Chapter II, Part 200, Subpart D, §200.306.

V. Geographic Location

The pilot will provide services to custodial and noncustodial parents across three Michigan counties (Calhoun, Genesee, and Kent). Each of these counties has existing resources (e.g., established community agencies) that will make this pilot more sustainable. These resources include pre-existing community partnerships, motivational interviewing trainers, implementation champions, and 2Gen initiatives. Yet, child support participants in each of the pilot counties face socio-economic and racial inequities that make it harder for them to support their children. The proposed project would focus on enhancing access to critical resources and reducing financial, racial, and other disparities among families in these counties.

VI. Duration of the Project

This three-year pilot project will be conducted between 2023-2026 and take place in three phases: (1) program design; (2) implementation/service delivery, (3) implementation and impact evaluation and service provision focused on addressing unmet needs among participants. Once phase one is complete, the Michigan Office of Child Support will submit a waiver request addendum providing additional details about the implementation and evaluation plans, including outcome measures and data sources, that have been developed during the program development year.

VII. Target Population and Estimated Number of Families Served

This pilot program will be open to all parents and non-parent custodians entering the Title IV-D child support program. However, the target population includes parents and non-parent custodians who report socio-economic barriers (e.g., transportation, stable housing, employment) to participating in the IV-D child support program. This population includes parents and non-parent custodians at or below poverty guidelines and Asset-Limited Income Constrained Employed (ALICE), which refers to families who earn above the poverty level but do not earn enough to sustain their families' basic needs when taking the cost of living in their county into account. In 2021, a Michigan family of four living at or below the federal poverty level could earn no more than $26,500 per year. The ALICE limit for the same family would be an annual income of $59,016 or less. Kellogg funding will be limited to participants who are at or below ALICE and/or poverty levels. While caregivers who do not report socio-economic barriers will not be excluded from participation, funding for these caregivers will come from sources other than Kellogg. Caregivers can participate in the pilot program at any stage of the child support process; however, our population of interest is parents and non-parent custodians entering the child support program. The contractors, Friend of the Court, and Prosecuting Attorneys will determine the best outreach strategy to engage participants. Participants will be self-referred, and participation will be optional.

VIII. Project Description

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In collaboration with the Friend of the Court and the Prosecuting Attorney, the navigator will informational sessions including individual and group sessions and workshops. To promote awareness and use of pilot services, navigators will disseminate program information using methods reviewed and approved by the local IV-D office and OCS. Throughout the course of the pilot, navigators will collect data needed for program evaluation and provide feedback to MDHHS and service providers based on aggregate data.

Inputs	Activities	Outputs	Outcomes
• Navigators • ·Friend of the Court partners • ·Community-based agency partners • ·Training resources • ·External evaluator	• ·Conduct eligibility screenings and initial needs assessments using motivational interviewing • ·Provide introductory overview of the child support program, e.g., life of a case • ·Disseminate relevant IV-D-related information and resources • ·Liaise with Friend of the Court partners • ·Outreach to community-based agencies • ·Refer to community service agencies • ·Assist with forms and facilitate access to printers and computers • ·Accompany participants to meetings and appointments (as appropriate) • ·Transport participants to meetings and appointments (as appropriate) • ·Ensure that participants have access to appropriate FOC accommodations • ·Promote navigator services • ·Collect data for evaluation and provide aggregate feedback to MDHHS and service providers.	• `·Number of participants served • ·Number, type of referrals to community agencies • ·Number of navigator contacts with child support staff • ·Number of participants who avoided arrears • ·Number of participants who received review and modifications • ·Outreach events	• Increased awareness of child support resources. • ·Increased utilization of child support resources. • ·Increased confidence in ability to access child support resources. • ·Increased understanding of child support program. • ·Increased participant understanding of child support requirements. • ·Increased confidence in ability to fulfill child support requirements.

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IX. Evaluation Plan

An independent, third-party evaluator will conduct the evaluation to ensure objectivity. Throughout the course of the pilot, navigators will collect data needed for program evaluation and provide feedback to MDHHS and service providers based on aggregate data. The evaluation plans for process and participant

outcomes are detailed below. In collaboration with the evaluator, Michigan OCS will further develop and design the measures and provide detailed information about the evaluation plan in an addendum.

Evaluation of Program Implementation

Program implementation outcomes of interest include the number of participants served, the number of contacts navigators had with each participant and whether contacts were initiated by navigators or participants; the number of referrals navigators made to community agencies, the number of yes navigators linked participants to child support staff/resources, xx, and number and type of referrals made by local child support offices to navigators. The findings of this process evaluation will inform the feasibility and potential efficacy of scaling up this pilot project.

Process Outcomes

Outcome	Measure/Source	Source
Frequency of child support payments	Number of payments/MiCSES	MiCSES)
Establishment of parentage	Established (yes/no)/MiCSES	
Order modification	Number, order modified (yes/no)	MiCSES
Arrears prevention	Number of participants who received assistance/avoided arrears	MiCSES; navigator documentation
Engagement with child support program	Participant engagement in establishing new or modified support orders	MiCSES; navigator documentation
Referrals to community organizations	Number, type	Navigator documentation

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Evaluation of Participant Outcomes

Participant outcomes of interest include awareness of and access to child support services and community resources and level of satisfaction with goal setting and attainment. Quantitative and qualitative data including pre-and post-surveys will be collected to evaluate these outcomes. Evaluators will test for agreement between navigator and participant perceptions of what individual participant goals are, whether they are met, and perceptions of the extent to which navigator played a role in goal attainment.

Semi-structured and structured interview data will be collected from participants xx. Systems data from the Michigan Child Support Enforcement System (MiCSES) may be leveraged to investigate the number and type of interactions with child support staff, the number and type of referrals to community-based resources, the frequency/consistency with which payers provide child support, the number and

outcome of requests for order modification, and the number of times navigators helped prevent child support arrears. Additional outcomes such as the influence of child support participation on co-parenting stress and parenting self-efficacy may also be explored.

Participant Outcomes

Outcome	Measure/Source
<u>Understanding of child support program</u> • Increased understanding of the role of child support professionals • Increased understanding of parent/non-parent custodian role and responsibilities within child support program	Pre- and post- surveys; participant, navigator
<u>Access to child support resources</u> • Awareness of child support resources • Use of child support resources • Access to child support-related community resources	Pre- and post- surveys; participant, navigator
<u>Perceptions of child support program fairness/usefulness</u> • Increase in perceived usefulness of child support • Increase in perceived fairness of child support	Pre- and post- surveys; participant, navigator
<u>Satisfaction with Program and Services</u> • Goal attainment • Satisfaction with navigator services	Post-surveys; participant

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X. Project Management and Staffing Plan

OCS will contract with local agencies with demonstrated experience providing family support services. These agencies will hire child support navigators who have direct child support experience, are familiar with child support outcomes and services, culturally competent, and knowledgeable about providing services to survivors of domestic violence. Agencies will be required to prepare and submit status reports and utilization, program capacity, and outcomes data and reports. OCS will provide standard OCS trainings to contractors and assigned staff, who will be required to complete them. Local offices will provide additional training on policies and procedures and orientation. Within OCS, the Child Support Navigator Program Manager will provide oversight of the daily operations and output of OCS child support navigator state staff and contracted vendors, providing direction and support to reach successful implementation of grant awards.

XI. OCSS Oversight and Involvement

To facilitate OCSS oversight and ensure that OCSS has various mechanisms to assess and offer feedback on the program design, implementation plan, and program and impact evaluation, OCS will conduct monthly calls with the OCSS project officer and regional OCSS staff. When appropriate, OCS will invite project partners to participate in meetings with OCSS.

XII. Budget

The total amount of federal financial participation requested for this project is $1,358,823.53, combined with the $700,000.00 received from W. K. Kellogg Foundation for a total project budget of $2,058, 823.53. The following budget table breaks down the expenditure by federal fiscal year.

The precise timing of expenditures will be determined during the planning year, but we anticipate that approximately $108,858, plus the applicable match ($217,716), will be spent in 2023 for planning activities, with most of the spending for program services occurring in 2024, and final spending occurring in 2025 to complete service provision and data gathering for the evaluation.

	Kellogg	IV-D	Total
RFP - 8 staff	$ 578,000.00	$ 1,122,000.00	$ 1,700,000.00
Calhoun co	$ 47,398.38	$ 92,008.62	$ 139,407.00
evaluation	$ 65,344.26	$ 126,844.74	$ 192,189.00
supplies	$ 9,257.36	$ 17,970.17	$ 27,227.53
total	**$ 700,000.00**	**$ 1,358,823.53**	**$ 2,058,823.53**

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