Bringing Counties Together to Improve Performance

Child Support Performance and Incentives

Where it started:

The 1998 Child Support Performance and Incentive Act (CSIPA) created a new structure to reward states that operated effective child support programs.

Incentive Formula

The incentive formula sets aside a fixed amount of money each year for federal incentive payments. Each State that meets performance and data reliability standards receives a portion of this fixed amount. Therefore, as one state substantially improves performance and receives a larger portion, the other states share of the fixed amount declines.

In FFY 2014, the total pool was \$547 million.

Principles of the Incentive Formula

The Child Support Program will put children first by creating an incentive funding formula that...

- is performance based, encouraging improved program outcomes.
- helps to achieve the goals articulated in the <u>National Strategic Plan</u>.
- continues to respond promptly to improvements in the desired area of performance.
- recognizes maintenance of high performance as well as improvement in performance level.
- requires that incentive dollars and federal matching funds be re-invested in the child support program.
- is simple and treats all children equitably.

Paternity



Children in open IV-D cases born outside of marriage with
Paternity established or acknowledged during the Fiscal Year (OCSE 157 line 6)
Children born outside of marriage during the preceding Fiscal Year (OCSE 157 line 5)

Line 6:

- Reports the number of children born out of wedlock in the IV-D caseload in cases open at the end of the FFY who have paternity established or acknowledged.
- Include paternities established or acknowledged during the fiscal year for cases closed during the fiscal year.

Line 5:

 Reports the number of children in the IV-D caseload in cases open at the end of the previous fiscal year who were born out of wedlock.

Order Establishment



Number of open IV-D cases with Support Orders at the end of fiscal year (OCSE 157 line 2)

Number of IV-D cases open at the end of the fiscal year (OCSE 157 line 1)

Line 2:

- Reports the number of IV-D cases open the last day of the fiscal year that have support orders established.
- Cases are counted once regardless of the number of orders.
- Includes all intestate cases.

Line 1:

- Reports the number of IV-D cases open on the last day of the fiscal year.
- Includes all interstate cases.
- Does not include non-jurisdictional cases.
- All alleged father cases for a child have to be combined and counted as one case.
- Cases where there is one case where child paternity is established and one case where
 paternity is not established is counted for both cases.
- Cases where child paternity is not established and is active in FCC case is counted 1:1 ratio (FCC cases are counted 1:1 because a case is required against each parent.)

Collection on Current Support



Amount of child support distributed to Current Support during the fiscal year (OCSE 157 line 25)

Amount of Current Support due during the fiscal year (OCSE 157 line 24)

Line 25:

- Reports the total amount of support collected and distributed as current support during the FFY for all IV-D cases.
- Voluntary payments are considered current support and reported here.
- Counts the 1% recovery fee.
- Includes voided and reissued warrants. Money must have disbursed; warrant must have been created or EFT transaction completed.

Line 24:

- Reports the total amount of current support due for the FFY for all IV-D cases.
- Includes total voluntary collections as amounts due.
- Does not include current amounts due on arrears or fees.

Collection on Arrearages



Total number of IV-D cases paying toward Arrears during the fiscal year (OCSE line 29)

Total number of IV-D cases with Arrears due during the fiscal year (OCSE 157 line 28)

Line 29:

- Reports the number of cases making a payment toward arrears during the FFY.
- Counts each case once.

Line 28:

- Reports the number of cases with arrears due during the FFY.
- Includes cases closed during the FFY with arrearages
- Counts each case once.

Cost Effectiveness



Total IV-D dollars collected during the fiscal year
Total IV-D dollars expended during the fiscal year

What this means:

 Your county's collections for 4 quarters (this information is reported on QQ640201).

Divided by....

• Your county's expenditures, less fee revenue which can be seen on the Net County Admin Report for the 4 quarters.

How do you Calculate Federal Incentives?

First - Calculate the collection base

Never Assistance Collections (\$) Current Assistance Collections (\$) x2 Former Assistance Collections (\$) x2

+ Medicaid Never Assistance Collections (\$) x2

= Your Maximum Collection Base

Second - Calculate the federal performance measures

Calculate maximum incentive for each indicator using your ratio in each measure to look-up your % of maximum incentive on the corresponding tables for use in the calculation. For example, obtaining a score of 95% on paternity qualifies you for 100% of the available incentive for that performance measure. Similarly obtaining a score of 73% on current support collections qualifies you for 86% of the available incentive for that measure.

Paternity Establishment Order Establishment Current Collections Arrears Collections Cost-Effectiveness

Third – Multiply the collection base by the applicable % of maximum incentive for each measure

 Maximum Collection Base
 x
 Your Maximum Paternity Establishment
 %

 Maximum Collection Base
 x
 Your Maximum Order Establishment
 %

 Maximum Collection Base
 x
 Your Maximum Current Collections
 %

 Maximum Collection Base
 x
 Your Maximum Arrears Collections
 %

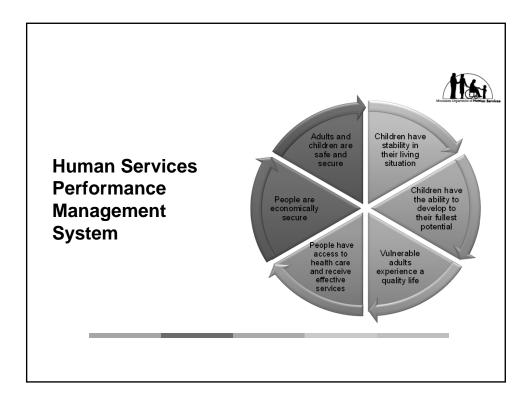
 Maximum Collection Base
 x
 Your Maximum Cost-Effectiveness
 %

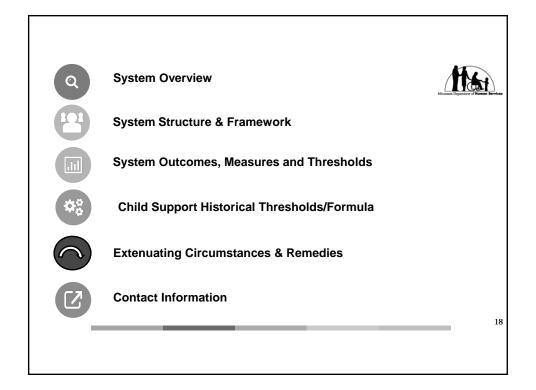
= Your Total Incentive Base

Data Reliability Audit (DRA):

In order to insure equity, each State will have a data reliability audit performed every year on the items used to calculate the incentives. Payment of incentives is contingent on a State's data being determined complete and reliable by Federal auditors.

More information can be found in the Child Support Performance Measures and Incentive Handout.







System History and Timeline



The Human Services Performance Management System creates an opportunity for the Minnesota Department of Human Services, counties, and community partners to work more closely together to improve the lives of people served.

Service Delivery Act 2009 legislation establishing Steering Committee on Performance and Outcome Reforms Legislative Report Legislative report issued in 2012 with specific recommendations; legislation establishing system and Council in 2013 Development
Development of the
system begins,
including hiring staff,
creating a framework,
and issuing baseline
reports

Implementation
PIPs are implemented
and technical assistance
has begun; new
measures and
partnerships are being
developed

2009 -2012

2012 -2013 2014 -2015

2016

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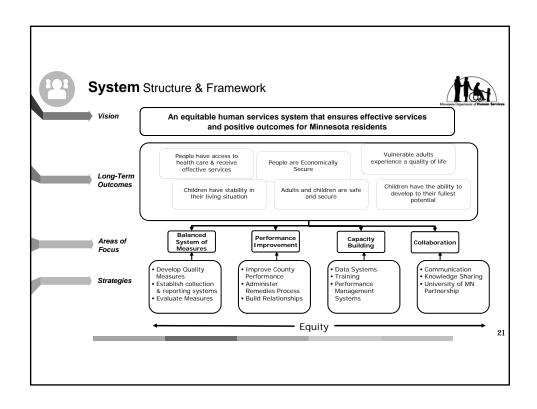


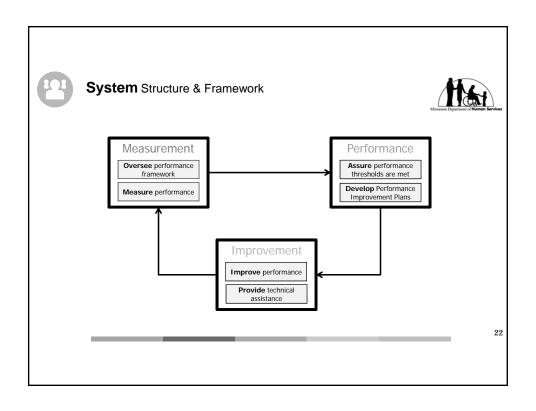
System Mission, Values, and Goals



- Mission To improve outcomes for people through creativity, flexibility, accountability, collaboration, and performance management.
- Values collaboration, continuous improvement, reliance on data, sustainability, flexibility, transparency, inclusiveness, equity
- No single entity can achieve client outcomes alone we need to work together to improve lives for the
 people we serve
- Goals:
- Establish shared outcomes and measures
- Emphasis on continuous improvement
- Create accountability and provides transparency
- Allow counties more flexibility in the "how"
- Ensure achievement of positive outcomes

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System Outcomes, Measures and Thresholds



			Millione	
Adults and children are	safe and secure			
Percent of children who do maltreatment determination		Percent of vulnerable adult maltreatment allegations where there is not a repeat of the same type within six months		
Children have stability i	n their living situation			
Percent of children reunifie 12 months	d with their family within	Percent of current child support that is paid		
Children have the oppor	rtunity to develop to thei	r fullest potential		
Percent of children in familiadoptive homes were place	,	Percent of open child support cases for which paternity is established		
People are economically	y secure			
Percent of MFIP/DWP adults working 30 or more hours per week or off cash assistance three years after baseline (Self- Support Index)	Percent of expedited SNAP applications where support was issued within one business day of application	Percent of public assistance applicants who received benefits within mandated timeframes	Percent of open child support cases with a child support order established	
Vulnerable adults experience quality of life				
People have access to health care and receive effective services				

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System Outcomes, Measures and Thresholds



		minneson Department of Front
Measure	Threshold	Standard
Outcome 1: Adults and children are safe and secure		
Percent of children with a maltreatment determination who do not experience a repeat maltreatment determination within six months	94.7%	94.7%
Percent of vulnerable adults with a substantiated or inconclusive maltreatment allegation who do not experience a subsequent substantiated or inconclusive maltreatment allegation within six months	80%	95%
Outcome 2: Children have stability in their living situation		
Percent of current child support paid	Historical	80%
Percent of children discharged from out-of-home placement to reunification who were reunified with 12 months	75.2%	75.2%
Outcome 3: Children have the opportunity to develop to their fullest potential		
Percent of children in family foster care that were placed with relatives	20.9%	45.0%
Percent of open child support cases with paternity	90%	90%
Outcome 4: People are economically secure		
Percent of expedited Supplemental Nutrition Assistance Program (SNAP) applications processed within one business day	55%	83%
Percent of SNAP and cash assistance applications processed timely	75%	90%
Percent of open child support cases with an order established	80%	80%
Minnesota Family Investment Program/Diversionary Work Program Self-Support Index	Within Range of Expect	Above ted Performance

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System Child Support Historical Thresholds/Formula



Formula for Determining Child Support Historical Thresholds by County

County Threshold Determined......The formula to determine each county's threshold for the current support paid measure is the average of the percentage point change in performance of the last four years added to the most recent year's performance.

Performance Declined......If a county's performance has been declining so that the four year average is a negative number, counties will be expected to maintain current performance rather than continuing to decline. The floor, which is the smallest change expected, is zero.

Performance Increased.....If a county has experienced great increases in performance, and the four-year average is greater than the three percentage points, the expected increase is capped at three percentage points. If a county has performance greater than 80 percent they will be expected to remain above 80 percent and their threshold will not require an increase in performance. This is the ceiling, the largest change expected.

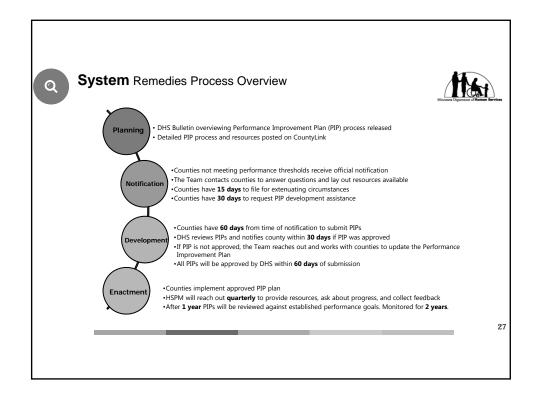
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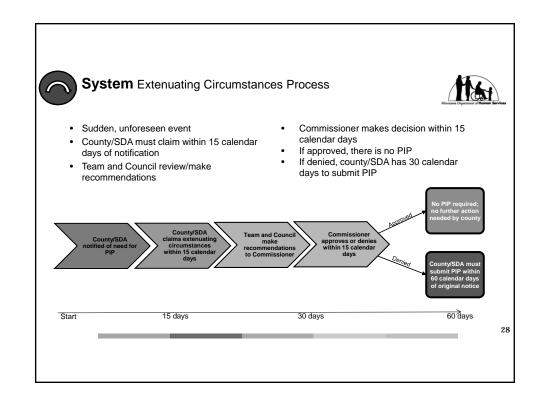


System Child Support Historical Thresholds/Formula

APPLYING HISTORICAL THRESHOLD: EXAMPLE					
Thistle County Historical Performance	Application of Formula				
2011 = 75.35% Current Collections	•Step 1 - Calculate YOY Change for past 3 years • 2012-2011 = 76.01 - 75.35 = 0.66				
• 2012 = 76.01% Current Collections	• 2013-2012 = 75.53 - 76.01 = -0.48 • 2014-2013 = 77.45 - 75.53 = 1.92				
• 2013 = 75.53% Current Collections	• Step 2 - Calculate average 3 year change •3 year change = (0.66 +048 + 1.92) / 3 = .70 pp				
• 2014 = 77.45% Current Collections	•Step 3 - Calculate next year's threshold •2015 Threshold = 77.45% + .70pp = 78.15%				

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Contact Information





Contact Information

Human Services Performance Management System

Team and Contact Information

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Marisa Hinnenkamp Director, DHS Agency & County Performance

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 Performance Management Data Analyst

 Debra Anthony
 Performance Management Coordinator

 Jessica Cintorino
 Performance Management Coordinator

 Charity Friederichs
 Performance Management Coordinator

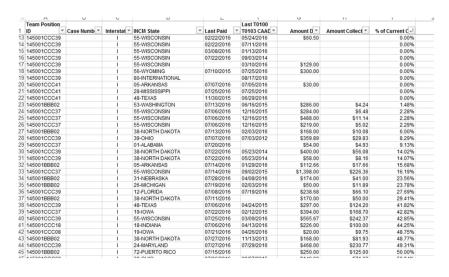
Vacant Performance Management Communications Coordinator

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Interstate

Stearns County
Jannell Boeckermann-Child Support Supervisor

145 Interstate Current Support Collected



How did we use this report?

- Used Excel sort field to allow grouping of cases:
 - By state
 - By % of support paid
 - By Date of last phone contact
- Focus on phone contacts with other states
 - Obtain current case status and ask follow up questions
 - Allowed us to offer information we have
 - Get timeframe for next action get a due date!

What was learned working this report?

- Court ordered amounts of child support were different – impacted current support %!
- Balances on cases did not match
- Clarified what remedies can be used in other state and provide info other state needed
- Relationships built with partners in other state
- Overall increase of current support collected on "I" cases, increasing county %

Stearns County progress

	Interstate Current Support													
	Benchmark													
	80%	January	February	March	April	May	June	July	August	September	October	November	December	Average
2013											44.01%	39.11%	45.61%	42.91%
2014		45.61%	46.24%	48.02%	50.76%	51.24%	50.64%	51.52%	50.27%	50.69%	51.11%	44.91%	53.16%	49.51%
2015		48.19%	51.44%	54.90%	48.13%	46.11%	48.87%	46.36%	52.87%	54.49%	54.18%	50.04%	55.13%	50.89%
2016		49.52%	52.71%	56.69%	55.55%	53.38%	54.72%	51.80%						53.48%

Increasing Collections and Measuring Performance

Anoka County Erin Hansen – Child Support Supervisor

Increasing Collections

- Call Day (Arrears)/Dialing for Dollars (Current obligations)
- Quarterly Collection Stats
- Current Projects



Call Day For Arrears Only Cases and Dialing for Dollars

- Talking Points
- Call Day Letter
- Thank You Letter



Strategies to Encourage Payments

Reasons for NCP to make payment:

- Dollar for dollar match on public assistance arrears for the term of this exercise
- Suppress interest on public assistance arrears
- Upon request after 12 consecutive months of full payments, suppression of interest may occur.
- Driver's license payment plan even a graduated payment plan - be creative
- Could improve credit rating with consistent payments

Strategies to Encourage Payments

Things to consider:

- Consider contacting CP to forgive some debt upon payment.
- Does the case meet AMPP criteria? Can dollar for dollar continue? Can another form of AMPP be used for the future?
- Encourage regular and consistent payments. If regular and consistent payments continue, this offer will be extended.

Call Day Results

Increased overall arrears collection percentage by 4.46% for the 3 month project.

50% of the NCP's who committed to make a payment followed through and made a payment.



Dialing For Dollars Results

The 3 month project focused on cases with current obligations and no payments in 12 months.

Number of Cases	Total Monthly Accrual	Payments Made	Collection percentage
208	\$56,415.20	\$8,271.64	15% June
208	\$57,686.20	\$2,686.71	4.66% July

Quarterly Collections Stats

A traveling trophy and certificate is given to the CSO with highest collections and most improved collections of the quarter.

Collection stats are monitored and reviewed each quarter.

Current Projects

Support Works

Partnership with Jobs & Training, County Attorney's Office and Child Support Services.

NCP ordered to work with Jobs & Training instead of being found in contempt.

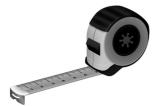
Current Projects

Highest Non-Paying Current Obligations

Obligations of \$600+ per month and no payment in at least 60 days are being thoroughly reviewed to determine follow up with NCP or employer, contempt, modification or arrears management.

Measuring Performance

- Performance Standards
- Work Outcome Statements
- Quarterly Coaching Meetings
- Case Reviews
- Goals and Accomplishments



Performance Standards

Examples:

- Number of Referrals made
- Phone Calls
- Work lists
- OnBase (mail)
- Suspense List
- Accuracy of legal work
- Meet statutory timelines

Work Outcome Statements

Each position has its own Work Outcome Statement. Major job functions are outlined with specific expected work outcomes and percentage of time spent for each function.

Example:

MAJOR JOB FUNCTIONS	WORK OUTCOME	VALUE
1. Public Contacts	Conduct internal and external contacts in a respectful, professional manner. Respond appropriately to client inquiries and requests. Explain rights and responsibilities to all case participants. Refer inquiries not related to child support to appropriate agencies. Return phone calls within 24 hours.	20%

Quarterly Coaching Meetings

Supervisors meet with each of their staff on a quarterly basis to go over specific job functions and provide feedback on areas expectations are being met and areas in need of improvement.



Case Reviews

A random selection of enforcement cases are reviewed and evaluated on a scale from 1-5 (5 being best) for the following:

- Effective timely follow up
- Intensity and frequency of contacts
- Comprehensive documented case notes

Goals and Accomplishments



Each year employees are asked to provide goals for the upcoming year and list accomplishments from the past year.

Goals are reviewed with each employee at their quarterly meetings.

Questions



Feel free to contact me if you have other questions.

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Ramsey County's Decision Making Guidelines — when to pursue past support when establishing a new support order

Presented by Jodi Abel, Ramsey County Supervisor

Why Were Guidelines Developed?

"Consistency."

To ensure parties with similar circumstances are treated similarly even when cases are worked by different workers.

Stated Goals of the Child Support Guidelines:

- Insure prompt and regular payment of child support
- Prevent either party or the child from living in poverty, while still providing for the joint child's needs.
 - County will not request past support if it would make prompt and regular payments extremely difficult or place NCP in poverty.

The following procedures provide guidance on how to determine if a request for past support is appropriate.

Step I: Determine who the past support is owed to (CP / State) and is reimbursement requested?

- A. Did NCP pay any direct support? Was it
- B. Contact CP does CP want past support? Or want to Reserve or Waive past NPA support?
 - Inform CP County may still ask to reserve past support based on relevant facts. CP can consult Attorney and/or file written response to have past support addressed at a hearing if they disagree with County's recommendation.
- C. Determine what types of past PA expended are eligible for reimbursement and dates expended.

Step II. Calculate NCP's Ongoing Support Obligations for:

Basic Support Medical Support Childcare Support.

Step III. Reserve or Waive Past support for Certain Categories:

Hypothetical Situation	Recommendation on Past Support owed to PA	Recommendation on Past Support owed to NPA
1. County is requesting a minimum basic support order (\$50, \$75, \$100) OR	1. Waive	Reserve unless CP agrees to waive past NPA support.
Self Support Reserve applies in the calculation of ongoing support.		

Step III. Reserve or Waive Past support for Certain Categories:

Hypothetical Situation	Recommendation on Past Support owed to PA	Recommendation on Past Support owed to NPA
2. County is using imputed potential income for NCP to calculate ongoing support.	2. Waive in most cases, but reserve if the NCP is self-employed and there is no documentation of income, or if NCP had high earnings in the past support period even if there is not a current ability to pay 120%.	2. Reserve unless CP agrees to waive past NPA support.

Step III. Reserve or Waive Past support for Certain Categories:

Hypothetical Situation	Recommendation on Past Support owed to PA	Recommendation on Past Support owed to NPA
3. County is recommending a downward deviation in the calculation of ongoing support.	4. Waive	4. Reserve unless CP agrees to waive past NPA support

Step IV. For NCP's that were not eliminated in Step III.... Determine how much income NCP has available for past support.

Step 1:

Gross monthly Income for NCP

- Single-1 Taxes
- Amount of court ordered support for non-joint children and spousal obligations, including arrears paybacks
- Deduction non-joint children in NCP's home whom NCP is legally responsible for
- Federal Poverty Guideline amount for 1 person
 Equals: Income Available for Support

STOP:

Not enough left to pay 120%? Waive/Reserve Enough left to pay 120% - continue to Step 2.

Step 2:

Income Available for Support from Step 1

- The amount NCP pays to maintain healthcare and dental coverage for NCP and NCP's dependents and spouse/partner

LESS amount other CP's contribute toward healthcare coverage

LESS guideline amount CP of this case would contribute toward healthcare coverage

Equals: Income Available for Support

STOP:

Not enough left to pay 120%? Waive/Reserve Enough left to pay 120% - continue to Step 3.

Step 3:

Gross monthly Income for NCP

- Single-1 Taxes
- Amount of court ordered support for non-joint child and spousal obligations, including arrears paybacks
- Deduction for non-joint children in NCP's home whom NCP is legally responsible for
- Instead of deducting FPG like Step 1 deduct NCP's reasonable monthly expenses following the expense checklist (including cost of healthcare from Step 2)

Equals: Income Available for Support

STOP:

- Not enough left to pay 120%? Waive/Reserve
- Enough left to pay 120% calculate NCP's past support amount!

Step V. Calculating Past Support Reimbursement and making a recommendation

A. Calculate all past support obligations that may be owed. (Basic, medical and child care)

 Even when reserving or waiving past NPA support, County may still request reimbursement of past cash, medical, and/or childcare assistance owed to the State!

Step V. Calculating Past Support Reimbursement and making a recommendation

B. After calculating amount of past support, credit any direct monetary support paid by the NCP to the CP against the total amount of past support calculated.

Step V. Calculating Past Support Reimbursement and making a recommendation

C. If NCP may owe both NPA and PA arrears during the past support period, determine how long it will take to pay the NPA arrears first at rate of 20% of recommended ongoing support.

• If repayment at 20% will not pay off NPA arrears in less than 4 years, WAIVE past PA reimbursement.

Step V. Calculating Past Support Reimbursement and making a recommendation

D. Partial Service Cases (Medical Support Services Only cases):

Consider that NCP is likely paying the CP directly for basic support when determining ability to pay past medical support.

• If no ability to pay ongoing basic and medical support and also pay 20% toward past support, waive past PA medical reimbursement.

I hope you find these guidelines helpful in determining whether or not to pursue past support when establishing a new support order!

Any Questions?

?

Presented at the 2016 MFSRC Annual Conference By Jodi Abel - Ramsey County Supervisor Jodi.Abel@co.ramsey.mn.us (651) 266-3183

Child Support Performance Measures and Incentives



Redesign of John Clark presentation 07/2016

Incentive Formula

The incentive formula sets aside a fixed amount of money each year for federal incentive payments. Each State that meets performance and data reliability standards receives a portion of this fixed amount. Therefore, as one state substantially improves performance and receives a larger portion, the other states share of the fixed amount declines.

Principles of the Incentive Formula

The Child Support Program will put children first by creating an incentive funding formula that...

- is performance based, encouraging improved program outcomes.
- helps to achieve the goals articulated in the National Strategic Plan.
- continues to respond promptly to improvements in the desired area of performance.
- recognizes maintenance of high performance as well as improvement in performance level.
- requires that incentive dollars and federal matching funds be re-invested in the child support program.
- is simple and treats all children equitably.

Also, every performance measure is a ratio with a numerator and a denominator.

Example:

A State has 10 open cases and has established orders on 5 cases:

Now, the State establishes an additional order:

The next action involves closing two cases:

Many States have experienced substantial success in reducing the denominator through case clean-up and case closure.

In order to insure equity, each State will have a data reliability audit performed every year on the items used to calculate the incentives. Payment of incentives is contingent on a State's data being determined complete and reliable by Federal auditors.

Paternity

Children in open IV-D cases born outside of marriage with Paternity established or acknowledged during the Fiscal Year

Children born outside of marriage during the preceding Fiscal Year



Performance Level	% of Maximum Incentive
80.0 % and above	100 %
79.0 – 79.9 %	98 %
78.0 – 78.9 %	96 %
77.0 – 77.9 %	94 %
76.0 – 76.9 %	92 %
75.0 – 75.9 %	90 %
74.0 – 74.9 %	88 %
73.0 – 73.9 %	86 %
72.0 – 72.9 %	84 %
71.0 – 71.9 %	82 %
70.0 – 70.9 %	80 %
69.0 – 69.9 %	79 %
68.0 – 68.9 %	78 %
67.0 – 67.9 %	77 %
66.0 – 66.9 %	76 %
65.0 – 65.9 %	75 %

Performance Level	% of Maximum Incentive
64.0 – 64.9 %	74 %
63.0 – 63.9 %	73 %
62.0 – 62.9 %	72 %
61.0 – 61.9 %	71 %
60.0 – 60.9 %	70 %
59.0 – 59.9 %	69 %
58.0 – 58.9 %	68 %
57.0 – 57.9 %	67 %
56.0 – 56.9 %	66 %
55.0 – 55.9 %	65 %
54.0 – 54.9 %	64 %
53.0 - 53.9 %	63 %
52.0 – 52.9 %	62 %
51.0 - 51.9 %	61 %
50.0 – 50.9 %	60 %
below 50.0 %	0

Example:	
Children in Open Cases with Paternity Established or Acknowledged during FFY	97
Children Born Outside of Marriage During the Preceding FFY	100
Performance Level = % of Maximum Incentive =	

Order Establishment

Number of open IV-D cases with Support Orders at the end of fiscal year

Number of IV-D cases open at the end of the fiscal year



Performance Level	% of Maximum Incentive
80.0 % and above	100 %
79.0 – 79.9 %	98 %
78.0 – 78.9 %	96 %
77.0 – 77.9 %	94 %
76.0 – 76.9 %	92 %
75.0 – 75.9 %	90 %
74.0 – 74.9 %	88 %
73.0 – 73.9 %	86 %
72.0 – 72.9 %	84 %
71.0 – 71.9 %	82 %
70.0 – 70.9 %	80 %
69.0 – 69.9 %	79 %
68.0 – 68.9 %	78 %
67.0 – 67.9 %	77 %
66.0 – 66.9 %	76 %
65.0 – 65.9 %	75 %

Performance Level	% of Maximum Incentive
64.0 – 64.9 %	74 %
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59.0 – 59.9 %	69 %
58.0 – 58.9 %	68 %
57.0 – 57.9 %	67 %
56.0 – 56.9 %	66 %
55.0 – 55.9 %	65 %
54.0 – 54.9 %	64 %
53.0 – 53.9 %	63 %
52.0 – 52.9 %	62 %
51.0 - 51.9 %	61 %
50.0 – 50.9 %	60 %
below 50.0 %	0

Example:	
Open IV-D Cases with Support Orders Established at the End of the FFY	82
IV-D Cases Open at the End of the FFY	100
Performance Level = % of Maximum Incentive =	
Establishment is weighted at 100% in the Incentive Base calculation.	

Collection on Current Support

Amount of child support distributed to Current Support during the fiscal year

Amount of Current Support due during the fiscal year



Performance Level	% of Maximum Incentive
80.0 % and above	100 %
79.0 – 79.9 %	98 %
78.0 – 78.9 %	96 %
77.0 – 77.9 %	94 %
76.0 – 76.9 %	92 %
75.0 – 75.9 %	90 %
74.0 – 74.9 %	88 %
73.0 – 73.9 %	86 %
72.0 – 72.9 %	84 %
71.0 – 71.9 %	82 %
70.0 – 70.9 %	80 %
69.0 – 69.9 %	79 %
68.0 – 68.9 %	78 %
67.0 – 67.9 %	77 %
66.0 – 66.9 %	76 %
65.0 – 65.9 %	75 %
64.0 - 64.9 %	74 %
63.0 – 63.9 %	73 %
62.0 – 62.9 %	72 %
61.0 – 61.9 %	71 %
60.0 – 60.9 %	70 %

Performance Level	% of Maximum Incentive
59.0 – 59.9 %	69 %
58.0 – 58.9 %	68 %
57.0 – 57.9 %	67 %
56.0 – 56.9 %	66 %
55.0 – 55.9 %	65 %
54.0 – 54.9 %	64 %
53.0 - 53.9 %	63 %
52.0 – 52.9 %	62 %
51.0 - 51.9 %	61 %
50.0 – 50.9 %	60 %
49.0 – 49.9 %	59 %
48.0 – 48.9 %	58 %
47.0 – 47.9 %	57 %
46.0 – 46.9 %	56 %
45.0 – 45.9 %	55 %
44.0 – 44.9 %	54 %
43.0 – 43.9 %	53 %
42.0 – 42.9 %	52 %
41.0 – 41.9 %	51 %
40.0 – 40.9 %	50 %
below 40.0 %	0

Example:	
Amount of Child Support Distributed to Current Support During the FFY	74 M
Amount of Current Support Due During the FFY	100 M
Performance Level = % of Maximum Incentive = Current is weighted at 100% in the Incentive Base calculation.	

Collection on Arrearages

Total number of IV-D cases paying toward Arrears during the fiscal year

Total number of IV-D cases with Arrears due during the fiscal year



Performance Level	% of Maximum Incentive
80.0 % and above	100 %
79.0 – 79.9 %	98 %
78.0 – 78.9 %	96 %
77.0 – 77.9 %	94 %
76.0 – 76.9 %	92 %
75.0 – 75.9 %	90 %
74.0 – 74.9 %	88 %
73.0 – 73.9 %	86 %
72.0 – 72.9 %	84 %
71.0 – 71.9 %	82 %
70.0 – 70.9 %	80 %
69.0 – 69.9 %	79 %
68.0 – 68.9 %	78 %
67.0 – 67.9 %	77 %
66.0 – 66.9 %	76 %
65.0 – 65.9 %	75 %
64.0 - 64.9 %	74 %
63.0 – 63.9 %	73 %
62.0 – 62.9 %	72 %
61.0 – 61.9 %	71 %
60.0 – 60.9 %	70 %

Performance Level	% of Maximum Incentive
59.0 – 59.9 %	69 %
58.0 – 58.9 %	68 %
57.0 – 57.9 %	67 %
56.0 – 56.9 %	66 %
55.0 – 55.9 %	65 %
54.0 – 54.9 %	64 %
53.0 – 53.9 %	63 %
52.0 – 52.9 %	62 %
51.0 - 51.9 %	61 %
50.0 – 50.9 %	60 %
49.0 – 49.9 %	59 %
48.0 – 48.9 %	58 %
47.0 – 47.9 %	57 %
46.0 – 46.9 %	56 %
45.0 – 45.9 %	55 %
44.0 – 44.9 %	54 %
43.0 – 43.9 %	53 %
42.0 – 42.9 %	52 %
41.0 – 41.9 %	51 %
40.0 – 40.9 %	50 %
below 40.0 %	0

Example:	
Cases Paying Toward Arrears During the FFY	74 M
Cases with Arrears Due During the FFY	100 M
Performance Level = % of Maximum Incentive =	
Arrears is weighted at 75% in the Incentive Base calculation.	

Cost Effectiveness

Total IV-D dollars collected during the fiscal year

Total IV-D dollars expended during the fiscal year



Performance Level	% of Maximum Incentive
\$5.00 and above	100 %
\$4.50 - \$4.99	90 %
\$4.00 - \$4.49	80 %
\$3.50 - \$3.99	70 %
\$3.00 - \$3.49	60 %
\$2.50 - \$2.99	50 %
\$2.00 - \$2.49	40 %
\$1.99 and below	0 %

Example:	
Total IV-D Dollars Collected During the FFY	\$ 600 M
Total IV-D Dollars Expended During the FFY	\$ 175 M
Performance Level = % of Maximum Incentive =	
Cost Effectiveness is weighted at 75% in the Incentive Base calculation.	

Collection Base Formula and Calculation

Never Assistance Collections (\$)

Current Assistance Collections (\$) x2

Former Assistance Collections (\$) x2

- + Medicaid Never Assistance Collections (\$) x2
- = Your Maximum Collection Base

Note: There is a total pool of incentive money established. Each State's share will be affected by how every other State performs under the incentive formula. For example in FFY 2014, the total pool is \$547 million.

The entire calculation is contained in 45 CFR 305.2-305.35

Incentive Calculation – Example 1

Note: There are only two states in this example. The incentive pool is \$500.

State A's Collection Base Calculation

Never Assistance Collections \$10.00

Current Assistance Collections \$15.00 x2

Former Assistance Collections \$5.00 x2

- + Medicaid Never Assistance Collections \$0 x2
- = Your Maximum Collection Base = \$50.00

STATE A

Measure	State A's Performance Level	Applicable % of Maximum Incentive	Weight	Calculation	State A's Incentive Base
Paternity Establishment	54%	64%	1.00	\$50 x .64 x 1.0	\$32.00
Order Establishment	79%	98%	1.00	\$50 x .98 x 1.0	\$49.00
Current Collections	41%	51%	1.00	\$50 x .51 x 1.0	\$25.50
Arrears Collections	40%	50%	.75	\$50 x .50 x .75	\$18.75
Cost- Effectiveness	\$3.00	60%	.75	\$50 x .60 x .75	\$22.50

Total Maximum Incentive Base for State A = \$147.75

State B's Collection Base Calculation

Never Assistance Collections \$3.00 Current Assistance Collections \$7.00 x2 Former Assistance Collections \$6 x2

- + Medicaid Never Assistance Collections \$0 x2
- = Your Maximum Collection Base = \$29.00

STATE B

Measure	State B's Performance Level	Applicable % of Maximum Incentive	Weight	Calculation	State A's Incentive Base
Paternity Establishment	100%	100%	1.00	\$29 x 1.0 x 1.0	\$29.00
Order Establishment	65%	75%	1.00	\$29 x .75 x 1.0	\$21.75
Current Collections	50%	60%	1.00	\$29 x .60 x 1.0	\$17.40
Arrears Collections	67%	77%	.75	\$29 x .77 x .75	\$16.74
Cost- Effectiveness	\$4.00	80%	.75	\$29 x .80 x .75	\$17.40

Total Maximum Incentive Base for State B = \$102.29

State A Total = \$147.75 State B Total = \$102.29

The National Incentive Base is = to the total of State A + State B (\$250.04)

Computing the State Share

State	Maximum Incentive Base Amounts	State Share of Incentive Base	Calculation to determine State Share of Incentive Pool	State Share of Incentive Payment Pool \$500
Α	\$147.75	147.75 / 250.04 = 59%	.59 x \$500	\$295
В	\$102.29	102.29 / 250.04 = 41%	.41 x \$500	\$205

Incentive Calculation – Example 2

Now consider if State A maximized all five performance measures and State B's performance remains the same as in the prior example. The results are as follows:

STATE A

Measure	Performance Level	% of Maximum Incentive	Weight	Incentive Base	
Paternity	90%	100%	1.00	\$50.00	
Establishment	3375			700.00	
Order	80%	100%	1.00	\$50.00	
Establishment	8076	100%	1.00	\$50.00	
Current	81%	100%	1.00	\$50.00	
Collections	0170	01/0 100/0		\$30.00	
Arrears	82%	100%	.75	\$37.50	
Collections	0270	3270 10070		Ş37.3U	
Cost-	\$5.01	100%	.75	\$37.50	
Effectiveness	\$5.01	100%	./3	\$37.30	
Total					
Incentive				\$225.00	
Base					

The National Incentive Base is = to the total of State A + State B (\$327.29)

State Share

State A	\$225.00	\$225.00 / \$327.29	=	69%
State B	\$102.29	\$102.29 / 327.29	=	31%

State A 69% x \$500.00 = \$345 **State B** 31% x \$500.00 = \$155

Important Points about Federal Incentive Calculations

- 1. Remember each performance measure is a ratio. You can improve performance either by increasing the numerator or by decreasing the denominator.
- 2. One large non-paying order can have a tremendous impact. For example, if you have one order for \$3,000 that is not paying and 30 orders for \$100 that are paying, your current support ratio is 50%. If you have 60 orders at \$100 that are paying, your rate improves to 66%. You would need 120 orders at \$100 per month that are paying faithfully to make up for the one large order of \$3,000 that is not paying to reach 80%.
- 3. You receive a larger incentive increase when your performance level reaches 80%. If your county performance increases by 1%, your % of the maximum incentive increases by 2%. For example, at 72% performance, you receive 84% of the maximum incentive, but at 73%, you receive 86% of the maximum incentive.
- 4. You only receive credit for distributed collections (out the door). Suppose you receive five payments on arrears during the year but cannot find the obligee. You receive no credit.
- 5. The arrears ratio is calculated per case. The amount of arrears is irrelevant. If you have one \$5.00 collection paid to the family during the year on a case with \$20,000 in arrears, you receive credit for the measure. On the other hand, if you have a case with \$100 in arrears and receive no payment, you receive no credit on that case.
- 6. The impact of a closed case is complex. Closing a case has an immediate impact on the current support ratio but does not affect collections on arrears until the next year.

For example, suppose you have \$100,000 due in current support for the year. After the first two months of the Federal Fiscal year, you are able to close 10 cases with orders of \$200 per month on each order.

This reduces your denominator by \$20,000 (10 cases times \$200 each = \$2,000 per month times 10 months = \$20,000). This would reduce your denominator by \$20,000.

If you close these 10 cases with 1 month remaining in the federal fiscal year, your denominator will be reduced by \$2,000. However, if these cases have arrears, your arrears denominator would not decrease until the next federal fiscal year.

How do you Calculate Federal Incentives?

First – Calculate the collection base

Never Assistance Collections (\$) Current Assistance Collections (\$) x2 Former Assistance Collections (\$) x2

- + Medicaid Never Assistance Collections (\$) x2
- = Your Maximum Collection Base

Second – Calculate the federal performance measures

Calculate maximum incentive for each indicator using your ratio in each measure to look-up your % of maximum incentive on the corresponding tables for use in the calculation. For example, obtaining a score of 95% on paternity qualifies you for 100% of the available incentive for that performance measure. Similarly obtaining a score of 73% on current support collections qualifies you for 86% of the available incentive for that measure.

Paternity Establisment Order Establishment Current Collections Arrears Collections Cost-Effectiveness

Third – Multiply the collection base by the applicable % of maximum incentive for each measure

Maximum Collection Base	Х	Your Maximum Paternity Establishment	%	
Maximum Collection Base	Х	Your Maximum Order Establishment	%	
Maximum Collection Base	Х	Your Maximum Current Collections	%	
Maximum Collection Base	Х	Your Maximum Arrears Collections	%	x .75
Maximum Collection Base	Х	Your Maximum Cost-Effectiveness	%	x .75

= Your Total Incentive Base

Best Practices from Washington County When Managing an Arrears-Only Caseload

- Understand your case, why is it arrears-only?
 - Emancipation
 - o CP requested case closure
 - o Child inactive for some other reason: foster care, child adopted, etc.
- Utilize your tools appropriately
 - o AMPP—more on this later
 - o Case Closure Code 920
 - Interest Suspension
 - o FIDM
 - Work with Ex Pro Team to obtain court-ordered payback and pursue contempt
- Proactive Case Management
 - o CALI to Xcel Spread-sheet script
 - Close Client Contact
 - Holistic view of case rather than task-based
- AMPP
 - o Determine your goal
 - Encourage moderate payment from non-paying NCP
 - Encourage work
 - Reward good behavior and encourage more payment
 - Encourage NCP subsistence
 - Eliminate collection activities on case where it is not cost-effective to pursue
 - Consider a variety of factors
 - Whether NPA arrears exist
 - Total arrears balance
 - Existence of other cases in other counties or states
 - Likelihood of collectability
 - NCP's willingness/ability to participate
 - Choose your strategy
 - Remove total PA arrears balance
 - Remove a portion of arrears that accumulated during a specific time period
 - Agree to lump sum settlement
 - \$1 for \$1 forgiveness on payments made
 - Request Approval of AMPP strategy
 - Present proposal to supervisor with concrete justifications for why the PA arrears should be compromised



COUNTY OF ANOKA

HUMAN SERVICES DIVISION OFFICE OF CHILD SUPPORT

ANOKA COUNTY GOVERNMENT CENTER 2100 3RD AVENUE, STE 401, ANOKA, MN 55303-5048 763-422-7320 FAX: 763-712-2315

September 20, 2016

NCP Name NCP Address NCP City, State, ZIP

Re: Child Support Case: PRISM Case #

Dear NCP Name:

I want to inform you of a unique opportunity to discuss the potential of a reduction in the amount of arrears you owe to the State of Minnesota or stopping the interest charging on the past due support. If you have had financially difficult circumstances such as extended unemployment, disability, incarceration or received public assistance you <u>may</u> be eligible to negotiate a resolution on the balance of child support arrears owed to the State of Minnesota.

I have reviewed your child support case and see that there has not been a payment on your child support obligation in some time. You currently owe **\$Total PA Arrears** to the State of Minnesota and **\$Total NPA Arrears** to the Custodial parent. It is important that you make some type of payment on this obligation. You will be given double credit towards the arrears owed to the State of Minnesota for any payment you make by Friday, July 11, 2014.

Mail your payment to:

MN CSPC PO Box 64326 St Paul MN 55164.

Be sure to include your MCI number, which is **NCP MCI #**, to ensure proper credit to your account.

Please contact me within **ten** (10) days at the phone number below and we can discuss your options regarding payment of these arrears.

Sincerely,

CSO Name Child Support Officer 763-CSO Phone Number



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September 20, 2016

NCP Name NCP Address NCP City, State, ZIP

Re: Child Support Case: PRISM Case #

Dear NCP Name:

On DATE I contacted you regarding payment on your child support obligation. I have reviewed you case and noted that you have followed through with your commitment to make a payment. Thank you. I have credited your case as promised. If you are interested in negotiating a potential resolution to your debt owed to the State of Minnesota, please contact me immediately. If you have had financially difficult circumstances such as:

- unemployment,
- underemployment,
- disability,
- incarceration,
- or are receiving public assistance,

you <u>may</u> be eligible to negotiate a resolution on the balance of the public assistance arrears.

Continue to make payments using your monthly billing statement or by mailing the payment to MN CSPC, P.O. Box 64326, St. Paul, MN 55164. Be sure to include your MCI number, which is NCP MCI #, to ensure proper credit to your account.

Please contact me within **ten** (10) days at the phone number below and we can discuss your intentions regarding payment of these arrears.

Sincerely,

CSO Name Child Support Officer 763-CSO Phone Number



COUNTY OF ANOKA

HUMAN SERVICES DIVISION OFFICE OF CHILD SUPPORT

ANOKA COUNTY GOVERNMENT CENTER 2100 3RD AVENUE, STE 401, ANOKA, MN 55303-5048 763-422-7320 FAX: 763-712-2315

September 20, 2016

NCP Name NCP Address NCP City, State, ZIP

Re: Child Support Case: PRISM Case #

Dear NCP Name:

I have reviewed your child support case and see that there has not been a payment on your child support obligation in some time. You currently are obligated to pay \$MONTHLY OBLIGATION AMOUNT per month. You owe **\$Total PA Arrears** to the State of Minnesota and **\$Total NPA Arrears** to the Custodial parent. It is important that you make some type of payment on this obligation. INCLUDE STRATEGY TO ENCOURAGE PAYMENTS

Mail your payment to:

MN CSPC PO Box 64326 St Paul MN 55164.

Be sure to include your MCI number, which is **NCP MCI #**, to ensure proper credit to your account.

You can also make payments through your Minnesota Child Support account online at www.childsupport.dhs.state.mn.us.

USE THIS PARAGRAPH IF THERE ARE PA ARREARS YOU ARE WILLING TO NEGOTIATE

I also want to inform you of a new process that allows for possible negotiation on arrears owed to the State of Minnesota. We are willing to discuss the potential of a reduction in the amount of arrears you owe or stopping the interest charging on the arrears owed to the State of Minnesota. If you have had financially difficult circumstances such as extended unemployment, disability, incarceration or received public assistance you <u>may</u> be eligible to negotiate a resolution on the balance of child support arrears owed to the State of Minnesota.

Please contact me within **ten** (10) days at the phone number below and we can discuss your options regarding payment of these arrears.

Sincerely,

CSO Name Child Support Officer 763-CSO Phone Number

Ramsey County's Past Support Review Cover	Sheet IV-D No Worker's Name:
CP's Last Name:	Step 1
NCP's Last Name:	NCP's Gross Income\$00
Ongoing Calculations	Less: S-1 Taxes \$00
Number of Joint Kids (including merge Kids:	NJC Orders (120%) \$00
(Estab or Pat Kid's DOB (not merge child):	NJC in NCP's home \$00
	Adjusted Net:\$00
	Less FPG\$990.00
СР	Income Available \$00
Actual Gross Income \$	Income Available is less than 120% of
Potential Income \$	ongoing so we will not pursue past support.
NJC in Home NJC CS Obligation total (100 or 120%) \$	Income Available for Support is more than 120% of ongoing support so continue to Step 2.
1400 00 Obligation total (100 of 12070) \$\psi	Step 2:
NCP	Income Available from Step 1\$00
Actual Gross Income \$ Potential Income \$	Less: NCP's total cost of healthcare and dental
NJC in Home	coverage for self, all dependents, and spouse/partner
NJC CS Obligation total (100 or 120%) \$	minus CP's CMI contribution to cost of dependent healthcare/dental\$00
Ongoing Support per Guidelines worksheet	Income Available \$00
\$ (TOTAL) <i>ATTACH WORKSHEET</i> NCP's CCH \$	Income Available is less than 120% of
NCP's CMS/CMI \$	ongoing so we will not pursue past support.
NCP's CCC \$	Income Available for Support is more than 120% of ongoing support so continue to Step 3.
120% = \$	Step 3
CP's CMI \$	NCP's Adjusted Net from Step 1 \$00
Ψ	Less: NCP's total cost of healthcare and dental
CP or NCP is being ordered to carry	coverage from Step 2 \$00
healthcare coverage? Yes or No NCP Individual cost \$	Less: NCP's Reasonable Expenses \$00 (**See page 2 for list of "reasonable expenses")
Other kids covered? \$#	Income Available \$00
, , ,	Income Available is less than 120% of ongoing so we will not pursue past support.
support? Yes or No what did CP	Income Available for Support is more than 120% of ongoing support so we will recommend
healthcare coverage? Yes or No NCP Individual cost \$ Other kids covered? \$ # Cost to cover joint child(ren) \$ Has CP specifically requested past NPA support? Yes or No what did CP say:	Less: NCP's Reasonable Ex (**See page 2 for list of "reasonab Income Available Income Available i ongoing so we will not pur Income Available for
We will not pursue past support because	# months to pay NPA arrears at 20%?
(circle one): Potential Income Minimum support	(if more than 48, waive past PA)
Self-Support Reserve Tax/FPG deviation CP No Legal Custody Married but Separated	ORDER PAST PA (Y or N): CCH Med Ins CCC un/un

2/18/16

Ramsey County's Past Support Review Cov

IV-D No.	
Worker's Name:	

Reasonable Monthly Expenses

(for purposes of reviewing past support or deviating on ongoing child support)

Things to consider when evaluating expenses:

- For shared expenses like housing and utilities, if there is more than one adult listed in the household, attempt to determine the party's actual share of these expenses. Otherwise, assume that each of the responsible adults is paying an equal amount of the shared expense.
- Use the actual expenses the party is paying, but in some cases limit¹ the amount of the expense as listed below to achieve balance between the needs of the NCP and the CP/child(ren).

	Current Monthly Expenses for household of adults + mino	r children
1	☐ House payment or ☐ Rent: actual cost of rent or mortgage, but consider housing assistance amounts and the size of the party's household. If the amounts seems unreasonably high, discuss with the assigned Supervisor and Attorney, taking into consideration the household size and the housing amount.	\$
2	Utilities: Gas (Utilities: actual monthly expenses)	\$
3	Electricity	\$
4	Water/Sewer	\$
5	Garbage	\$
6	Phone: actual expenses with a maximum of \$100.00 for the party's own phone	\$
7	Food: actual expenses with a maximum of \$240.00 for one person, plus an additional \$160.00 per child living in their home for whom the party is responsible	\$
8	Personal care/Clothing/Household products: actual expenses with a maximum of 10% of the gross monthly income.	\$
9	Medical/Dental Insurance Monthly Premium: actual expenses for party and dependent coverage	\$
10	Uninsured/unreimbursed medical and dental expenses: average monthly payment (such as copays, prescriptions, etc.)	\$
11	Transportation: Bus/train/taxi fees (max of \$85.00 per month)	\$
12	Car payment/month (max of 20% of gross income for car payment, tabs, and insurance per month)	\$
13	Gasoline (actual expenses with a maximum of \$200.00, unless driving job)	\$
14	Child care expenses : only the portion that party pays (including before/after school care) *Do not give double credit for childcare expenses & court-ordered childcare support.	\$
15	Student loan payments: actual monthly payment	\$
	TOTAL MONTHLY EXPENSES:	\$

Other Monthly Expenses – While many families incur these expenses, these are not included for purposes of reviewing past support ability or deviating on ongoing support.

• DO NOT INCLUDE: Recreation or Entertainment, magazine expenses, Cable/satellite TV; Internet; IRS or restitution payments; Credit card payments.

¹ The "max" amounts listed for these expenses were obtained from current pricing and/or guidelines published by the U.S. Department of Agriculture, Bureau of Labor Statistics – Consumer Expenditures, U.S. Energy Information Administration, cell carrier data and Metro Transit.

TALKING POINTS

Monday, June 06, 2016 3:36 PM

Ongoing Caseload Call Day Talking Points:

- Make sure you have reviewed your cases. Familiarize yourself with the case before the call.
- If you cannot get ahold of the NCP the first time, try again later in the day. If valid phone number is not available/located, mail "Call Day Letter."
- Identify yourself and advise that you have noticed that a payment has not been received since _____, ask them what their current circumstances are and the reason for non-payment.
- Inform NCP that making payments is now easier, as payments can be submitted online on the MN Child Support Website. Provide NCP with MCI/pin, if needed.
- Listen and assess which incentives would most likely induce compliance.

Things to consider:

- Consider contacting CP to forgive some debt upon payment.
- Does the case meet AMPP criteria? Can \$ for \$ continue? Can another form of AMPP be used for the future?
- Encourage regular and consistent payments. If regular and consistent payments continue, this offer will be extended.

Other Possible Incentives:

- \$ for \$ match on PA arrears for the term of this exercise (or similar arrears management strategy be creative). Suppression of interest on PA arrears (offer if NCP begins making payments or potential self-payors set up ARW be creative).
- Upon request, after 12 consecutive months of full payments, suppression of interest may occur.
- DL payment plan even a graduated payment plan be creative!
- Offer suppression of interest/PA arrears forgiveness based on NCP obtaining & maintaining employment and/or providing verification of a diligent job search.

Get a commitment!

- Ask the NCP, when will they mail the payment?
- How much will they be sending in?
- How often can they make a payment?

People are more likely to make payment if they have to answer these questions.

Don't hang up the phone without summarizing the results of the call:

Their commitment; your expectations; and, the possible consequences if the expectations are not met. Worklist out the date NCP says the payment will be made. Follow up on that date if payment isn't made. FOLLOW THROUGH WITH THESE CASES ON A MONTHLY BASIS!

Possible reasons for non-payment:

- Incarceration
- Disability
- Injury/Illness
- Public Assistance
- Limited Income

Determine if modification of order is appropriate and discuss modification options.

Provide Resources:

- Blaine Workforce Center (handout available in OneNote)
- Anoka County Law Clinic or similar law clinic in NCP's area (handout available in OneNote)
- MNcourts.gov Help Topics
- Contact information for Adult/Family Economic Assistance department

Sample Scripts:	
. ,	from Anoka County Child Support. I'm calling today to discuss the rour child support case regarding CP Name. We haven't had a payment I'm calling to work on setting up a payment schedule on your case.

- Listen to NCP's reason for non-payment, validate their situation, feelings.
- Ask open ended questions, will you send a check or a money order? What day will you be mailing the payment?

If NCP states he/she will make a payment... "How much will you be paying? When will you mail that to the payment center (provide them the address and instructions on proper identification on the check or money order)? How often will you be able to make that

payment? The client has the option of coming in and making the payment also, as well as paying online.