



Michigan Supreme Court

State Court Administrative Office

Trial Court Services Division

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MEMORANDUM

DATE: July 23, 2009

TO: Friends of the Court

cc: Chief Circuit Judges
Presiding Family Division Judges
Circuit Court Administrators
Family Division Administrators

FROM: Steven D. Capps

RE: SCAO Administrative Memorandum 2009-04
Providing Information to Credit Reporting Agencies

The Friend of the Court Bureau within the State Court Administrative Office's Trial Court Services Division develops recommendations for the operation of county friend of the court (FOC) offices. Each FOC must take all necessary steps to adopt office procedures that implement the Bureau's recommendations. [*MCL 552.503(7)*]

This memorandum addresses the legal requirements of credit reporting by FOC offices and explains how and when to report a support payer's arrearages to credit reporting agencies pursuant to [MCL 552.512](#). It supersedes State Court Administrative Office (SCAO) Administrative Memorandum 2007-07 and FAQ 2008-01. Both the reporting format and the list of credit reporting agencies (CRAs) that receive those reports have changed since the SCAO issued its previous advisories on this topic.

Credit reporting is completed through MiCSES, and the various steps become part of that system's documentation. Any action initiated in MiCSES must follow the correct chain for that action. MiCSES automatically reports child support payers whose arrearages exceed the statutory threshold for credit reporting and who meet other criteria summarized in this memorandum.

For most delinquent support payers, MiCSES handles arrearage analysis and reporting actions centrally and automatically. But MiCSES first automatically excludes the following categories of payers from selection:

- Payers exempted from enforcement by a court order.
- Payers with an active case that is less than two months old.
- Deceased payers.
- Payers with bankruptcy actions (depending on how the information was entered in MiCSES) that began prior to October 17, 2005.¹
- Payers with cases in which seven or more years have passed since all children associated with the case became emancipated or graduated from high school, whichever occurred later.²

In addition, MiCSES will not *automatically* select: non IV-D cases; spousal support only cases; cases with no valid address in the address hierarchy; cases with no verified social security number; cases with no verified date of birth; or “initiating” interstate cases.³ In those situations, FOCs should, when appropriate, *manually* select payers for credit reporting. Examples of when FOCs should manually select cases include: when a payer’s total support arrearage equals or exceeds two months’ support obligation; where a court orders credit reporting; or when a payer requests that the FOC report a favorable payment history to a CRA.

The reporting processes summarized in this memorandum comply with applicable state and federal laws. If courts or FOC staff have any questions regarding this memorandum, please contact Toni Beatty at BeattyT@courts.mi.gov or 517-373-5975.

¹ See AT 2008-014, REVISED: The Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 (Bankruptcy Act) at <http://10.42.125.27/policy/stateat/?year=2008> .

² While Michigan’s statute of limitations on the debt is ten years (MCL 600.5809 [4]), CRAs do not report debts older than seven years, so MiCSES will not pull these cases for credit reporting purposes. For information on the federal requirement to report overdue child support information, see 15 USCS §1681s-1.

³ For a more detailed list of the types of cases that MiCSES will not select, see the MiCSES Customer Information Guide: Credit Reporting (CIG) at <http://mi-support.cses.state.mi.us/systems/micses/document.aspx?id=1121>.

A. Reporting Requirement and Background

1. The Reporting Requirement.

[MCL 552.512](#) requires an FOC to report a support payer to a CRA when: (1) the payer's support arrearage equals or exceeds two months' support obligation,⁴ or (2) the payer asks to be reported.

2. Participating CRAs.

MiCSES currently reports credit information to two CRAs: Innovis and Experian.⁵ Both share data with other CRAs.

3. Reporting Methods.

a. Automatic Reporting. MiCSES automatically determines whether an eligible payer will be reported and creates a notice to the payer. If the payer does not object within 21 days, MiCSES then submits the payer's case information to CRAs on behalf of the affected FOC.

b. Manual Reporting. FOC users may manually select and report a payer in MiCSES when: (1) statutory requirements for selection of a payer are met but the payer is not automatically selected due to the automated filters in MiCSES; (2) the payer has asked the FOC to file a report; or (3) the court has ordered credit reporting for a payer or case.

B. Reporting Procedures

[MCL 552.512](#) requires that credit reporting procedures be acceptable to SCAO, the Michigan Department of Human Services (DHS), and the CRAs. In 1993, representatives from those three groups agreed on certain reporting procedures and they reaffirmed those procedures in a 1996 policy update that remains in effect. They agreed that submissions to the CRAs would be automated and that MiCSES would compile the information statewide and serve as the centralized primary source of data sent to CRAs.

C. Determining Arrearage and the Reporting Threshold

Michigan law requires FOCs to report payers whose total support arrearage equals or exceeds two months' support obligation. Support is defined in [MCL 552.502a](#) and [MCL 552.602\(ff\)](#) as including payments to or for the benefit of a child or a spouse. Either type of support may include payments for medical, dental, or other health care expenses; childcare expenses; educational expenses; the mother's Paternity Act pregnancy and

⁴ The definition of support includes spousal support. (See [MCL 552.502a](#)) MiCSES will automatically select spousal support cases that have an accompanying child support order. If the case involves only spousal support, MiCSES will not automatically select it because it is not a IV-D case, but FOCs may manually select the case for credit reporting.

⁵ In the event of a dispute, only payees may contact CRAs at the CRAs' customer service telephone numbers. Innovis can be reached at 800-540-2505 and Experian at 888-397-3742.

confinement expenses; and any surcharges as defined in [MCL 552.603a](#).

1. Orders that Authorize Installment Payments:

If an order states that a fixed-amount obligation, such as the mother's confinement expenses, may be paid in monthly installments, then only past-due installments are counted when calculating the payer's arrearage. For example, if confinement costs total \$4,500 and the court orders the payer to pay \$100 per month toward that total obligation, the reportable arrearage will accrue at the rate of \$100 a month. This differs from a situation in which the court has ordered the payer to pay the entire \$4,500 in one payment by a certain date. SCAO recommends reviewing the order to determine the court's intent.

2. Deciding Whether the Arrearage Must be Reported:

a. Threshold Calculation

FOCs should consider these factors when they manually select cases for reporting.⁶

- 1) When calculating the two-month arrearage threshold, count all current support obligations in a IV-D case, including support for both the spouse and the children. See [MCL 552.602\(ff\)](#).
- 2) The two-month threshold must be calculated using the payer's current support obligation. If there is no current obligation, then FOCs should use the most recent prior obligation (i.e., the current obligation on the last date that any current obligation existed). If the payer does not have a current support obligation and the prior obligation cannot be determined, SCAO recommends that FOCs use \$1,000 as a reasonable estimate of the two-month arrearage threshold. MiCSES follows the SCAO recommendation for IV-D cases.

b. Statutory Exceptions for "Documentation" in Disputed Cases:

[MCL 552.607a](#) prohibits FOCs from treating a payer as having an arrearage if the payer can produce documentary evidence (e.g., pay stubs, wage statements, or other written documentation by the payer's employer) that the support money withheld from the payer's income equaled or exceeded the support payments required by the court order.

⁶ MiCSES looks at the same factors when automatically selecting cases for reporting, but it may fail to select some reportable cases because MiCSES must use the last obligation for each obligation type/dependent even if those last occurred on different dates. However, MiCSES allows FOCs to manually submit these cases for reporting.

MCL 552.511(2) states: “An arrearage amount that arises at the moment a court issues an order imposing or modifying support, because the order relates back to a petition or motion filing date, shall not be considered as an arrearage for the purpose of initiating support enforcement measures, centralizing enforcement, or other action required or authorized in response to a support arrearage under this act or the support and parenting time enforcement act, unless the payer fails to become current with the court ordered support payments within two months after entry of the order imposing or modifying support.” MiCSES addresses this by preventing cases from being selected for credit reporting if the support order date is less than two months prior to the date that the selection process runs.

D. Notice

1. Before reporting a delinquent payer to a CRA, [MCL 552.512\(2\)](#) requires an FOC to provide the payer with a written notice⁷ that includes:
 - a. A statement that the payer’s arrearage exceeds the reporting threshold and, therefore, the payer will be reported to credit reporting agencies.
 - b. The exact amount of the arrearage as of a specific date.
 - c. The payer’s right to have the arrearage determination reviewed, the date by which a request for a review must be made, and the grounds on which the payer may object to the proposed reporting action.
 - 1) The notice should include information about how to object to the proposed reporting action and how to request a review.
 - 2) Payers have 21 days (from the date the notice was mailed) to object and request a review.
 - 3) The only grounds on which a payer may object involve a mistake of fact concerning either the amount of the arrearage or the payer’s identity.
 - d. A statement that the payer may avoid being reported by paying the entire arrearage within 21 days after the notice was mailed. Because any payments will be applied first to the payer’s current support installment, the notice should state that, in order to avoid being reported, the payer must also pay any current support that will become due by the 21st day.

⁷ MiCSES automatically sends the *Notice of Intent to Report Child Support Debt to Credit Reporting Agency* (FEN 081) to the delinquent payer when a case is designated for credit reporting, even if the case has been designated manually by an FOC user. This document will not be generated if the payer requests reporting and has no arrearage. The FEN081 is not the same as the 10-day notice that is required when an FOC requests a party’s credit report. There is no standard form for that notice.

2. Mailing the Notice.

The notice should be mailed as soon as MiCSES or the FOC determines that the case qualifies for reporting to the CRAs. Pursuant to [MCR 3.203](#), the notice must be mailed to the payer's last known address.

E. If the Payer Objects and Requests a Review

The payer may object to the proposed credit reporting and request a review on the grounds of a mistake of fact concerning either the amount of the arrearage or the payer's identity.⁸ This section summarizes the review procedures. The FOC must:

1. Defer sending any report to the CRAs until after consideration of the payer's objections.
2. Following a payer's timely request for review, the FOC must not report a payer to the CRA until one of the following occurs:⁹
 - a. The time allowed for the review expires without the payer producing evidence of any mistake of fact about the arrearage amount or the payer's identity.
 - b. After conducting the requested review, the FOC determines that the information in the FOC records regarding the payer's identity and arrearage data are correct.

3. Time Frame for Conducting the Review.

While the statute is silent as to a deadline for conducting a review, SCAO recommends conducting the review within 21 days after the FOC receives the review request, because MiCSES will report the payer to the CRA if no objection has been recorded in the system within 21 days of the notice being sent to the payer. If circumstances require, the FOC may extend this timeline, but the FOC must record this information as an objection on the CRAR chain in MiCSES to ensure that credit reporting does not begin.¹⁰ SCAO recommends that, prior to the review, the FOC provide the payer with the account information on which MiCSES or the FOC based the decision to initiate credit reporting, which will allow the payer an opportunity to evaluate the information before the formal review process begins.

4. Who Conducts the Review?

The statute is not specific about who conducts the review. The review may be

⁸ If an FOC receives an objection based on assertions other than mistake of fact (e.g., payer identification or arrearage amount), SCAO recommends informing the payer that the objection does not meet the statutory requirements and that the FOC is not required to perform an administrative review.

⁹ Please see the MiCSES system documentation to properly implement this portion of the policy.

¹⁰ See MiCSES CIG and CRAR Activity Chain at <http://10.42.125.27/ProgramLibrary/DocumentList.aspx?id=41>

administrative. SCAO recommends that each FOC decide whether the review will be administrative (conducted by an FOC staff member), quasijudicial (conducted by a referee in accordance with the requirements of [MCR 3.215](#)), or judicial (conducted by a judge).

5. How to Address Objections to the Outcome of the Review.

If a person objects to the outcome of the review, the FOC is under no obligation to provide further opportunity for review. If an office provides additional reviews before a judge or referee in other administrative reviews, e.g. tax offset reviews, it should provide the same opportunity for these reviews.

6. Forms.

- a. As soon as a review hearing date is scheduled, an Arrearage Determination Form (FEN074) or a Notice of Review on Arrearage Consumer Reporting Agency [Form FOC 69] must be mailed to the payer at the payer's last known address [MCR 3.203]. The notice includes a statement that the payer may bring an attorney to the review.
- b. After the review has ended and a determination has been made, the FOC must send a Determination on Arrearage [Form FOC 70] and Order and Determination of Arrears (Form FEN084) to the payer pursuant to [MCR 3.203](#).

F. Special Situations

1. If the review affirms the decision to report, the payer should be notified of the opportunity to avoid being reported by paying the arrearage.¹¹
2. A payer may be paying on a repayment plan under MCL 552.603d, but if the payer's arrearage exceeds the credit-reporting threshold, the case should still be reported. Because there has been no mistake of fact involving either the payer's identity or the arrearage amount, no review is required when a payer's objection to the reporting relies solely on the existence of an approved repayment plan.

G. Reporting

1. Routine Reporting.
In most cases, an above-threshold payer will not object, and MiCSES will handle the reporting automatically.
2. Post-Review Reporting.

¹¹ This can be done either by using paragraph nine on the [FOC 70](#) (FEN084) or by addressing the issue in a letter accompanying the [FOC 70](#) (FEN084). SCAO recommends allowing the payer five business days to pay the arrearage. An FOC then can make the report to the CRA any time after that. MiCSES system design allows reporting as soon as the next monthly reporting occurs. This could be one day or thirty days, depending on when the batch runs after the decision to report. If the full arrearage is paid prior to reporting, the payer will not be reported.

If the review does not change the initial determination, MiCSES will automatically begin to submit reports to the CRAs after the FOC informs MiCSES that the review is complete and no changes need to be made.¹²

3. Payer Asks to be Reported.

A payer may contact the FOC and request to be reported to a CRA. This usually happens because the payer wants creditors to be aware of a good support-paying history. SCAO recommends that the FOC continue reporting until the payer requests that it stop. Exception: If a payer who asks that voluntary credit reporting stop has, in the meantime, built up an arrearage that exceeds the statutory reporting threshold, then the notice of intent to report should be sent to the payer and the review processes described earlier should be followed.¹³

4. How Long to Continue Reporting?¹⁴

The SCAO recommends that reporting continue until one of the following occurs:

- a. All arrearages are eliminated.
- b. The payer who requested reporting now requests that credit reporting stop.¹⁵
- c. The case is closed. The SCAO recommends that FOCs exercise caution when forcing CRAR chains to close following the abatement of arrears. Forced closure may prevent \$0 arrears from being reported to CRAs and the CRAs may continue to report the last debt of the payer.¹⁶
- d. The case becomes interstate initiating.¹⁷

H. Payer Disputes Credit Reporting Information Directly to the CRA

After the reporting starts, a payer may contact a CRA and object to the accuracy of the information that was reported by the FOC. This includes a mistake of fact regarding the payer's identity or the arrearage amount.

1. What is e-Oscar?

The e-Oscar system is an online computer system that allows CRAs to streamline the process of verifying debts (including child support arrears) when a payer disputes reported debts directly to the CRA. Michigan implemented e-Oscar for

¹² See CRAR Activity Chain at <http://10.42.125.27/ProgramLibrary/DocumentList.aspx?id=41>.

¹³ MiCSES will automatically start the enforcement process once the payer's arrearage exceeds the reporting threshold.

¹⁴ MiCSES will automatically report for only seven years after the age of emancipation or graduation from high school, whichever is later.

¹⁵ After manually stopping, if the arrears on the case exceed the two-month threshold, then MiCSES will initiate automatic selection.

¹⁶ CRAs may continue to report credit history for up to seven years after a case is closed.

¹⁷ Credit reporting responsibilities should be verified with the responding state.

all 83 counties on October 1, 2008. E-Oscar does not intersect with the processes outlined in [MCL 552.512](#), but failure to work either the e-Oscar process or the MiCSES system chain may result in an FOC office losing the ability to use the remaining process as a credit-reporting tool (see Section K below). Both processes may run concurrently and each has its own timelines and tasks.

2. How does e-Oscar Work?

CRA's must comply with federal timelines when responding to a payer who protests a debt that a creditor has reported to the CRA. E-Oscar allows CRA's to easily comply with these timelines by allowing virtually instantaneous requests for verification of a debt via the internet. When a payer protests the reporting of a child support debt directly to the CRA, a request for verification is immediately sent to the affected FOC offices. Each FOC office has a queue in the e-Oscar system.

- a. [15 USC 41 1681i\(a\)\(1\)](#) states that if a consumer contacts a CRA and challenges the completeness or accuracy of any information contained in the agency's file on that consumer, the CRA must conduct a reasonable investigation. The CRA has 30 days following notice by the consumer to determine if the information is accurate. The CRA may extend that deadline for not more than 15 days.
- b. Within five business days¹⁸ of being notified by the consumer of an alleged inaccuracy in its file, the CRA must provide a notice of the dispute to whomever provided the information [See [15 USC 41 1681i\(a\)\(2\)](#)] E-Oscar makes reporting disputes to FOCs via MiCSES virtually instantaneous. The CRA uses that link to send an automated credit dispute verification (ACDV) electronically to the FOC.¹⁹
 - 1) When the FOC receives an ACDV from a CRA, the notification should be treated as a payer's objection to the FOC's report. All timelines, responsibilities, and limitations described above apply. The FOC should respond as if the payer had filed a dispute directly with the FOC and requested a review.
 - 2) If the dispute concerns a mistake of fact about the arrearage amount or the payer's identity, then the FOC must conduct a review to determine the accuracy of the data reported.²⁰

¹⁸ E-Oscar transmits to MiCSES immediately upon notification by the consumer.

¹⁹ The ACDV is the same form as the Consumer Dispute Verification (CDV) form. The ACDV is electronic and the CDV is the paper version of the same form. The forms are interchangeable.

²⁰ See MiCSES CIG at <http://10.42.125.27/policy/stateat/?year=2008> .

3. Who has Access to e-Oscar?²¹

a. ACDV Responder.

Each FOC office must have at least one staff member with access to e-Oscar.²² This person serves as the office's "ACDV Responder." SCAO strongly recommends that each FOC office also designate a backup staff person, trained on the e-Oscar system, who can work the system if the main ACDV Responder becomes unavailable. The assigned staff person must review the member and case information in MiCSES for accuracy and respond to the CRA before the deadline specified in the transition header on each dispute.

b. Queue Manager.

Each FOC office must designate at least one staff member as the "Queue Manager." If the ACDV Responder has not responded to CRA requests to verify child support debts within eight days, the Queue Manager will receive an e-mail notification—and will continue to receive notifications every day until the dispute information has been accessed or the timeframe for response has expired. The Queue Manager assures that ACDVs receive an accurate and timely response. The Queue Manager also makes determinations as to any requests to CRAs to reinsert the account of a deleted account number. Some FOC directors have chosen to retain the role of Queue Manager to ensure immediate feedback when timelines are not met. Larger offices may choose to designate several Queue Managers to ensure prompt responses by those offices.

4. Confidentiality.

Usernames and passwords issued to ACDV Responders and Queue Managers are confidential.²³ SCAO recommends that FOCs have appropriate procedures in place to safeguard user identification and password access.

I. If a Payee Disputes a Credit Report to the FOC After Reporting has Already Begun

1. If a payer's arrears have been reported to a CRA, and the payer later contacts the FOC to dispute the reported arrearage amount, and the dispute does not seem frivolous or irrelevant, the FOC must enter the dispute into MiCSES, which will notify all affected CRAs.²⁴

²¹ See AT 2008-042 at <http://10.42.125.27/ProgramLibrary/DocumentList.aspx?id=41>

²² The FOC staff person assigned to e-Oscar only has access to the ACDVs received from CRAs on the child support cases in that one FOC office.

²³ See OCS AT 2008-043 at <http://10.42.125.27/policy/stateat/?year=2008>

²⁴ According to [15 USC 41 1681s 2\(3\)](#), "If the completeness or accuracy of any information furnished by any person to any consumer reporting agency is disputed to such person by a consumer, the person may not furnish the information to any consumer reporting agency without notice that such information is disputed by the consumer."

2. The FOC should initially determine whether the dispute is frivolous or irrelevant pursuant to 15 USC 1681s-2(a)(8)(F). That statute states that a frivolous or irrelevant dispute includes: (1) “the failure of the consumer to provide sufficient information to investigate the disputed information;” or (2) “the submission of a dispute that is substantially the same as a dispute previously submitted by or for the consumer” that has already been investigated.
 - a. If the FOC deems the dispute to be frivolous or irrelevant, the FOC must notify the child support payer by mail, unless another means is authorized by the payer, no later than five business days after making the determination. The notice must include (1) the reasons for the determination and (2) any information that the FOC would require to further investigate the dispute.
 - b. If the FOC does not consider the dispute frivolous or irrelevant, the FOC must investigate the disputed information, review all relevant information provided by the child support payer, and report the results of the investigation to the payer within 30 days of receiving notice of the dispute from the child support payer -- unless this time period has been extended by 15 days as statutorily allowed (see 15 USC 1681i[a][1][A] and [B]).
3. The FOC should enter into MiCSES a case note that the FOC has received a post-reporting notice of dispute. This will automatically notify all potentially affected agencies of the dispute.²⁵
4. Definition of “Disputed Information.”

[15 USC 1681i\(a\)\(1\)](#) defines “disputed information” as including the completeness or accuracy of “any” information. The SCAO recommends that such disputes be reported to the CRA if they include:

 - a. A mistake of fact concerning the arrearage amount; or
 - b. A mistake about the payer’s identity.²⁶

J. **Consumers Who Claim to Have No Michigan Child Support Case**

If a Michigan child support account appears on the consumer’s credit report, but the consumer claims not to have a Michigan child support case, the FOC staff should:

1. Ask for the first 12 digits of the “support payer” account number that appears on the credit report. The first two digits are the FOC office county code; the next ten digits are the case docket number.
2. Enter the docket number into MiCSES and verify the consumer’s identity and

²⁵ See <http://10.42.125.27/systems/micses/document.aspx?id=1121>

²⁶ These are the same criteria established by [MCL 552.512](#) as the only grounds on which a payer may dispute the arrearage data that is being reported.

social security number (SSN). If the identity and SSN match the support case, provide the consumer with instructions on how to properly dispute the credit reporting through the FOC. If the consumer's identity or SSN is not listed on MiCSES, inform the consumer that although Michigan did provide the support-payer account number to the CRA, Michigan did not report the consumer's identity or SSN. Instruct the consumer to directly contact the CRA to question what may be an error by the CRA. The consumer also should inform the CRA that the consumer has contacted the data furnisher (the FOC), and has learned that the information was submitted to the CRA under a different identity or SSN. The consumer may need to initiate a formal dispute with the CRA. If that happens, the FOC that corresponds to the county code on the account number will receive an ACDV form. In response to the ACDV form, the FOC should respond that the consumer who disputes the account's SSN has a different SSN than the one that corresponds to the account information.²⁷

3. If the consumer identity or SSN match the information in MiCSES, the FOC should gather additional information to determine whether the person is responsible for the reported child support account. If either the identity or SSN listed on MiCSES does not belong to the payer of the child support order, but was previously reported to the CRA, the FOC should update the identity or SSN in MiCSES and instruct the consumer to inform the CRA that MiCSES will indicate the new identity or SSN information for the account on the next monthly file sent to the CRA. To ensure that the account is no longer listed on the individual's credit report, the consumer may need to file a formal dispute with the CRA. If the consumer does that, the FOC that corresponds to the county code on the account number will receive an ACDV form. In response to the ACDV form, the FOC should inform the CRA that the consumer who disputes the account has a different identity or SSN than the one shown in the current account information.²⁸

K. What Happens When an FOC Fails to Respond to an ACDV?

If an FOC fails to make a timely response to a CRA's request to verify a support debt, the CRA must remove the debt from the payer's credit report. Further, the CRA will no longer accept reports of any of the payer's Michigan child support cases for reporting.

On the other hand, if the FOC makes a determination (as opposed to failing to respond) that a payer should not have been submitted for credit reporting, the FOC should exclude the payer from credit reporting on MiCSES. The CRA will receive the update via MiCSES and delete the entire history tied to the associated account number. Then the FOC will retain the ability to report future credit information on the payer.

²⁷ SCAO recommends that the FOC contact the CRA directly to inform it when a CRA has inappropriately attached the wrong credit file to a debt that the FOC is accurately reporting.

²⁸ For more information, see OCS AT 2008-042, e-Oscar: The Online Credit Reporting Dispute System, at <http://10.42.125.27/policy/stateat/?year=2008> .

L. Interstate Cases

The states have not agreed on a uniform national method for reporting support arrearages in cases that involve multiple states. Because two states may use different criteria to report arrearages, sometimes they may report the same arrearage, while other arrearage cases may go unreported by either state.

1. MiCSES automatically reports arrearages in interstate cases when Michigan is the responding state. MiCSES does not automatically report arrearages when Michigan has initiated enforcement or modification in another state. The latter statement is true regardless of whether Michigan or another state issued the support order. MiCSES also prevents manual reporting when Michigan initiated the enforcement. That policy avoids duplicative reporting.
2. If Michigan is the responding state and the payer is being “double reported”:
 - a. SCAO recommends contacting the other reporting state(s) to determine whether the reported arrearages are, in reality, the same support debt. If so, the states should decide which state will continue to file reports.
 - b. If another state insists on continuing to report, and if those reports will include all support arrearages (including those in which Michigan has an interest), then SCAO recommends that Michigan’s representatives manually override MiCSES and stop the double reporting. Conversely, if the other state indicates that it will cease filing reports, then SCAO recommends allowing MiCSES to continue reporting any arrearages that will not be reported by the other state.