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# STATE OF MICHIGAN DEPARTMENT OF TALENT AND ECONOMIC DEVELOPMENT

TALENT INVESTMENT AGENCY WANDA M. STOKES DIRECTOR ROGER CURTIS DIRECTOR

## **OFFICIAL**

Policy Issuance (PI): 17-01 Change 1

**Date:** June 27, 2017

To: Michigan Works! Agency (MWA) Directors

From: Wanda M. Stokes SIGNED

Director

**Subject**: Food Assistance Employment and Training (FAE&T) Program Policy

Guidelines for Counties with Time-Limited Food Assistance (TLFA) for

Able-Bodied Adults Without Dependents (ABAWDs)

**Programs** 

Affected: FAE&T

Rescissions: PI: 17-01

References: Food and Nutrition Act (the Act) of 2008, 7 U.S.C. § 2011 (2008) (originally

enacted as Food Stamp Act of 1977, as amended, Public Law [PL] 88-525

[1964])

Food, Conservation, and Energy Act of 2008 (2008 Farm Bill), PL 110-246

(2008) (codified, as amended, at 7 U.S.C. § 2015)

7 Code of Federal Regulations, Department of Agriculture, Parts 273.24,

273.7 and 277

PI: 14-14, Michigan Works! System Plan Instructions, issued

December 11, 2014, and subsequent changes

PI: 15-12, Procurement, issued July 17, 2015

PI: 06-10, Individual Service Strategies, issued September 8, 2006

PI: 16-15, Fiscal Year 2017 FAE&T Plan Instructions, issued

September 30, 2016, except for the Supportive Services maximum limitation

noted on page 3.

PI: 16-15 Change 1, Fiscal Year 2017 FAE&T Plan Instructions, issued

May 11, 2017

#### Background:

The Food and Nutrition Act of 2008 provides that State agencies be given maximum flexibility in designing Employment & Training (E&T) programs for individuals receiving food assistance. The FAE&T Program provides participants opportunities to gain skills, training, or experience to improve their ability to obtain regular employment and increase self-sufficiency. The State of Michigan operates a voluntary FAE&T Program, which is jointly administered by the Michigan Department of Health and Human Services (MDHHS) and the Michigan Talent Investment Agency (TIA).

The FAE&T Program is designed to establish a connection to the labor market for ABAWDs that do not qualify for a deferral. ABAWDs subject to time-limits are between the ages of 18 and 49 years old (beginning the first calendar month after the 18<sup>th</sup> birthday through the last calendar month before the 50<sup>th</sup> birthday). However, the individual may continue to participate in FAE&T through the calendar month of the 50<sup>th</sup> birthday. Also, the ABAWD must not have a minor (under the age of 18) on their Food Assistance Program (FAP) case.

The MWAs serve the ABAWDs who are referred to E&T by the MDHHS, with oversight and technical assistance from the TIA.

The MWAs are required by state law to subcontract with public and/or private providers through a competitive procurement process for case management and delivery of participant services unless granted approval otherwise in accordance with PI: 11-13, or any policy issuance that replaces PI: 11-13. Each MWA, within the parameters of state and federal policies, will design its FAE&T Program to meet the demands of its labor market and the needs of the program participants.

## Policy:

The following counties are subject to this policy: Kent, Oakland, Ottawa, and Washtenaw. All other counties remain under the waiver and are not subject to TLFA or this policy.

# **Time-Limited Food Assistance (TLFA)**

A TLFA individual must meet specific work requirements to receive benefits. An individual who is neither deferred nor meeting the TLFA work requirement may receive FAP benefits for only three countable months in a 36-month period. This individual must also meet all other FAP eligibility criteria. An individual who has received three countable months can regain FAP eligibility (within the 36-month period) by complying with the work requirement or meeting a deferral criteria. The first 36-month period begins January 1, 2017, and ends December 31, 2019. The MDHHS is responsible for determining if an individual receives a countable month and has the authority to grant good cause and remove a countable month. An individual's TLFA and countable month status will be displayed on the One-Stop Management Information System (OSMIS).

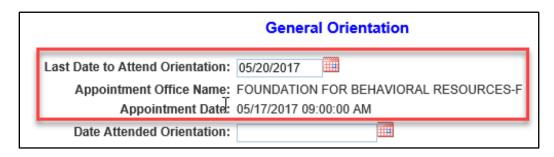
#### **FAE&T Referral**

The MDHHS is responsible for determining if the ABAWD is subject to TLFA and will refer individuals to FAE&T. The MDHHS will facilitate the electronic referral via the Bridges system by sending an ABAWD TLFA referral type to the OSMIS, as well as generating a DHS-4785-F, FAP Employment and Training Appointment Notice, which is sent to the participant.

In generating an FAE&T referral and the DHS-4785-F, Bridges will take into consideration the requirement to allow six days for mailing time when scheduling the individual to the first available appointment. The orientation appointment information is transmitted to the OSMIS. The MWA may view a report containing the appointment information via the "Orientation Appointments" link on the Special Functions header tab in the Welfare Reform program section of the OSMIS.



In addition, the "Appointment Office Name" and "Appointment Date" are auto-filled on the participant's Welfare Reform registration screen. The "Last Date to Attend Orientation" (LDTA) is calculated as 15 days after the day the referral was processed unless the appointment is beyond 15 days. In such cases, the LDTA will equal the last day of the appointment date month.



#### **Program Overview**

The FAE&T Program will help ABAWDs subject to TLFA participate in employment and training activities that will assist the individual to fulfill the ABAWD work requirement, increase skills and abilities, and obtain self-sustaining employment. Fulfilling the ABAWD work requirement is essential for TLFA individuals referred to the MWA to maintain or regain their FAP benefits. However, FAE&T participation is not required. TLFA individuals can choose how they will meet the work requirement, and FAE&T is one option.

## **Program Orientation**

If any ABAWD referred to the MWA does not attend an orientation prior to their LDTA as indicated in the OSMIS, a new electronic referral will need to be approved by the MDHHS and sent via Bridges. The orientation should consist of an overview of the program, responsibilities of the participant, and the consequences for noncompliance as it relates to the general work requirement. The time spent in the orientation session must be documented on OSMIS in the "Educational/Training Prgrms-Emp Enhancement Srvs" activity.

The MWA is responsible for assessing the employment and educational needs of the ABAWDs, then assigning appropriate activities.

## **Individual Service Strategy**

Individual Service Strategies are required electronically for all new participants and should contain personal characteristics, identified barriers, assessment results, and existing skill levels.

All participants must be evaluated, and it must be documented on the OSMIS registration screen whether the participant has limited ability in speaking, reading, writing or understanding the English language.

## Participant Header Fields and Definition



**Referral Type**: There are two referral types for FAE&T participants residing in a county without an ABAWD waiver.

- ABAWDs (who are not deferred or working more than 20 hours a week) will be automatically referred and display as "ABAWD TLFA." This referral type is only generated from Bridges.
- ABAWDs, who are deferred or working more than 20 hours a week but <u>ask</u> to be referred to an MWA, will display as "ABAWD Volunteer." This referral type is only generated from Bridges. **Note**: Bridges will not schedule or send a notice to attend orientation for this referral type.

Eligibility: The "begin date" of the customer's current FAP benefits.

**Case Review:** The date of the customer's next FAP case redetermination review by the MDHHS.

**Extension Began:** The month and year the customer began to receive FAP benefits as part of eligibility for a three-month extension.

**FAP Grant**: The monthly grant amount and corresponding month and year. "View All" link will show previous values sent to OSMIS.

Household Workfare/ Work Experience: The number of hours the customer can perform workfare or work experience in the corresponding month without violating the Fair Labor Standards Act. A TLFA customer can meet the ABAWD work requirement by participating in Workfare for the number of hours displayed in this field.

**Monthly Req. Hrs:** The number of hours the customer must participate in FAE&T to meet the ABAWD work requirement for the corresponding month and year.

**Multiple ABAWD:** This indicates if there is another ABAWD on the FAP case who was referred to the MWA. "Yes" or "No" and the corresponding month and year will display.

**TLFA:** This indicates if the customer is subject to Time-Limited Food Assistance. "Yes" or "No" and the corresponding month and year will display.

**Countable Months:** The number of months the TLFA ABAWD has received FAP benefits without being deferred or meeting the ABAWD work requirement (limited to three in 36 months). "0," "1," "2," or "3" will display.

**Regain Eligibility:** The start date the customer is attempting to regain FAP benefits after receiving three-countable months.

#### TLFA Work Requirement

ABAWDs referred to the MWA may fulfill their work requirement by:

- Participating in and complying with the requirements of the program activities (except workfare) for 80 hours per month;
- Any combination of working and participating in program activities (except workfare) for 80 hours per month; or
- Participating in and complying with the workfare activity to the extent of the maximum allowable hours calculated by the MDHHS.

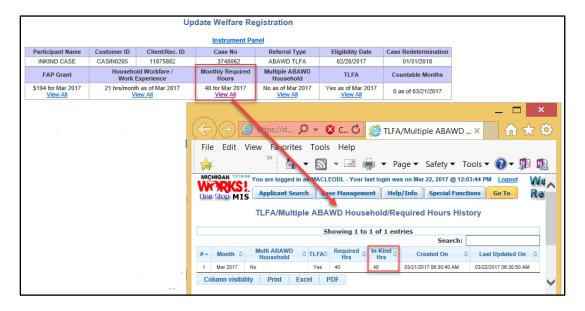
At any time the participant can choose to return to the MDHHS to meet the work requirement by engaging in Self-Initiated Community Service (SICS) or working 80 hours per month.

#### "In-Kind" Work Hours

"In-Kind" work is defined as any work that is done in exchange for goods or services. The work requirement for 80 hours per month may be reduced if MDHHS has applied "in-kind" work hours to the individual's FAP case. This value is displayed in TLFA/Multiple ABAWD Household/Required Hours

History page which is accessible from the View All links in the participant header. This value is used by OSMIS to reduce the 80 Monthly Required Hours.

Example: An individual works 40 hours of "In-Kind" per month. Bridges will send the 40 hours to the OSMIS. The OSMIS will assume 40 hours out of the 80 will be met, and the OSMIS will display the required hours as 40. **The MWA does not document or track participation associated with "In-Kind" hours.** 



#### Multiple ABAWD Household

The following applies to participants from a FAP case where there is more than one ABAWD subject to TLFA:

- The OSMIS will display "Yes" in the "Multiple ABAWD Household" field on the participant header.
- The work requirement of 80 hours is an individual requirement.
- The workfare activity is a household obligation; and, as such, the hours can be met by one or both participants.



## **TLFA Status**

An individual may be referred to the MWA with an ABAWD TLFA referral type but not subject to the work requirement for that month. The MWA must engage the participant in E&T activities, but the participant is not required to complete the 80 hours for that month.

Participant Name	Cust ID	Client/Rec. ID	Case No	Referral Type	Eligibility	Case Review	Extension Began
ROBERT	RARO	. J24127.	39507	ABAWD TLFA	05/05/2017	04/30/2018	-
FAP Grant	Household Workfare/Work Experience		Monthly Req. Hrs	Multiple ABAWD	TLFA	Countable Months	Regain Eligibility
\$168 for May 2017 View All	18 hrs/month as of May 2017 <u>View All</u>		0 for May 2017 <u>View All</u>	No as of May 2017 View All	No as of May 2017 View All	0 as of 05/09/2017	-

**Example:** An individual applies for FAP benefits <u>after</u> the first of the month and is referred to the MWA. Once approved, the benefits will be prorated and not subject to the three-countable-month limit. The TLFA status will display "No" and required hours will display "0" in the OSMIS. Please note the "required hours" refers to how many hours are needed for the participant to meet the work requirement if they choose to meet the work requirement through FAE&T.

# **Program Activities**

The MWA has the flexibility to determine the sequencing of assigned activities on an individual participant basis. Due to the voluntary nature of the program, participants should not be disqualified from FAE&T for failure to comply with the requirements of a specific activity. A participant may be moved to a different activity to continue participation.

All activities permit a stronger emphasis on case management, and it may be provided on a continuing basis throughout participation in FAE&T. The hours spent by ABAWDs in case management activities should be included as participation in the approved activities.

When assigning activities, please note that participants <u>cannot be required</u> to participate more than 30 hours per week. However, the total amount of time spent monthly by participants in FAE&T activities, combined with hours worked in workfare, and unsubsidized employment is <u>unlimited</u>. Participants may <u>volunteer to participate in hours above</u> the required amount if permitted by the MWA.

Case management procedures, including entry of actual hours of participation into the OSMIS and documentation requirements for substantiating actual hours recorded, are detailed later in this policy.

#### Job Search

(Enter in the OSMIS as "Job Search" activity.)

"Job search" is the act of seeking or obtaining employment and requires job seekers to make a pre-determined number of inquiries to prospective employers over a specified period of time. This activity may be designed so that the job seeker conducts his/her job search independently or within a group setting.

#### Job Search Training

(Enter in the OSMIS as "Job Search Training" activity.)

"Job search training" assists individuals to become familiar with general workplace expectations, and learn behaviors and attitudes necessary to compete successfully in the labor market. Job search training may include, but is not limited to:

- teaching participants how to read maps and bus schedules,
- tips on personal hygiene and appearance, and
- testing, job interests, use of any career planning tool or the Pure Michigan Talent Connect system.

If the TLFA field in the OSMIS displays "No," the participant can be **enrolled solely** in "job search" and/or "job search training" for the month for which the field represents.

If the TLFA field in the OSMIS displays "Yes," time spent "job searching" or in "job search training" <u>must be done in conjunction</u> with another allowable activity and may only comprise up to half of the total hours of the primary activity.

Job search and job search training are not qualifying activities, related to the work requirement which is necessary to maintain FAP eligibility for ABAWDs.

**Example:** If a participant was assigned 56 hours of vocational training, they could be assigned 24 hours of "job search" or "job search training" to total 80 hours for the month. However, participants may <u>volunteer</u> to participate in "job search" hours above the assigned amount.

If the participant is dual-enrolled in Title I of the Workforce Innovation and Opportunity Act (WIOA) or Section 236 of the Trade Adjustment Assistance (TAA) Act, the limitation on the number of hours of participation in job search and/or job search training does not apply. Also, job search and job search training as part of the WIOA or TAA are considered qualifying activities relating to the participation requirements necessary to maintain FAP eligibility for ABAWDs.

#### **Dual Program Enrollment**

The MWA may coordinate placement in employment and training programs through other allowable funding sources for which the participant is eligible. Time spent participating in the additional program activities can be applied to FAE&T, as appropriate.

Dual program enrollment may not exceed 12 months. A direct connection between the training and employability must be established. (Note: FAE&T participants may not participate in programs funded under Temporary Assistance for Needy Families, such as PATH).

## Enrollment in WIOA or TAA Programs

(Enter in the OSMIS as the "Dual Program - WIOA/TAA" activity.)

Participants may be enrolled in this component if they are participating in employment and training activities with the WIOA program or Section 236 of the TAA Act.

# • Enrollment in State or Local Projects or Programs

(Enter in the OSMIS as the "Dual Program – Other" activity.)

Participants may be enrolled in this component if they are dually enrolled in other state or local employment and training programs, such as the Prisoner Re-Entry program.

# **Unpaid Work Activities**

"Unpaid work activities" are work assignments where participants receive compensation in the form of their monthly FAP allotment in lieu of wages. These assignments are not intended to create employee/employer relationships. An MWA shall take into account the prior training, experience, and skills of a participant, along with employment and training objectives when making appropriate assignments. The MWAs must negotiate the terms for placement of participants into unpaid work activities and must approve assignment location(s).

#### Workfare

(Enter in the OSMIS as the "Workfare" activity.)

"Workfare" is a work component in which FAP recipients perform work in a public service capacity. The primary goal of workfare is to improve employability and encourage individuals to move into unsubsidized employment while returning something of value to the community. Workfare must take place with a public or private non-profit agency.

A participant should not be assigned to other E&T activities while assigned to workfare to meet the ABAWD work requirement; however, they may choose to participate in other activities.

The MWA must enter a case note if a participant volunteers for additional workfare hours; however, the additional hours must not be entered in OSMIS as actual hours for the activity.

#### Work Experience

(Enter in the OSMIS as the "Work Experience" activity.)

The "work experience" component is designed to improve the employability of participants through actual work experience and/or training. The goal of this experience is to enable participants to move into regular employment. In contrast to the workfare component, work experience placements can be with private, for-profit companies.

Workfare and work experience must comply with these conditions:

- Must not provide any work that has the effect of replacing or preventing the employment of an individual not participating in workfare or work experience. Vacancies due to hiring freezes, terminations, or layoffs must not be filled by workfare or work experience participants.
- Participants must be provided the same job-related benefits and working conditions that are provided at the job site to employees performing comparable work for comparable hours. These are benefits related to the actual work being performed, like workers' compensation and not to the employment by a particular agency, such as health benefits. Of the benefits required, any elective benefit that requires a cash contribution by the participant will be optional at the discretion of the participant. Participants are covered by workers' compensation as outlined in the <a href="DHHS Bridges Eligibility Manual (BEM) 232">DHHS Bridges Eligibility Manual (BEM) 232</a>.
- The provisions of Section 2(a)(3) of the Service Contract Act of 1965 (PL 89-286) relating to health and safety conditions apply to the workfare and work experience activities.
- Workfare or work experience jobs must not, in any way, infringe upon the promotional opportunities that would otherwise be available to regular employees.
- Workfare or work experience jobs must not be related, in any way, to political or partisan activities.
- Assigned participation in workfare or work experience may not exceed the number of hours transmitted from Bridges for display in the OSMIS as "Household Workfare/Work Experience" hours. Participants are not eligible to participate in workfare or work experience until an hourly value is displayed in the field as indicated below:



**Example**: In the case above, if Tanya completes 33 hours of participation in the workfare activity for the month of July, the ABAWD

work requirement has been met, and the participant does not receive a countable month.

As described earlier in this policy, the monthly 80-hour requirement does not apply to the workfare activity, and workfare is a household obligation. All members of a multiple ABAWD household can share the hourly obligation over the course of the month. It is also allowable for one of the participants to complete the activity and the other participant to be assigned to the "Non-Participating ABAWD" activity in the OSMIS, as described later in this policy.

"Hours available for work experience" is also a household limit; however, the participants are still required to meet the monthly individual 80-hour work requirement. As with all E&T activities, the participant can volunteer to participate additional hours.

During workfare or work experience, the MWA should continue efforts to assist the participant in obtaining employment, e.g., sending out the participant's resume and setting up employment interviews.

## **Educational and Training Programs**

Educational and training opportunities can provide the skills needed to secure unsubsidized employment and ultimately self-sufficiency. Only educational components that directly enhance the employability of participants are allowable. A direct link between the educational program and job-readiness must be established for the component to be approved by the MWA.

#### Literacy and Academic Skills Training

(Enter in the OSMIS as the "Educational/Training Programs – Literacy" activity.)

Educational/training programs expand the job search abilities or employability of those subject to the program. Allowable educational activities may include, but are not limited to:

- o high school or equivalent education programs,
- o remedial education programs to achieve a basic literacy level, and
- o instructional programs, such as English as a Second Language, basic computer skills training, and basic literacy skills.

There are no time limits on participation in literacy and academic skills training programs. It is left to the discretion of the MWA to determine how long individuals are to remain in literacy and academic skills training.

Actual hours for this activity can be pre-filled up to 90 days into the future from the current date at the number of hours the participant is

expected to participate in the activity. If the MWA chooses this option, participation must be confirmed monthly.

# Employment Enhancement Skills Training

(Enter in the OSMIS as the "Educational/Training Prgrms-Emp Enhancement Srvs" activity.)

The goal of "employment enhancement skills training (EEST)" is to increase or develop participants' motivation to begin and continue participation in activities relating to employment. It is designed to stabilize participants living circumstances and facilitate successful involvement in the program. In addition to participation in the FAE&T orientation session, this may include activities such as:

- o improving self-image,
- motivational activities, which include prioritizing work and building or improving self-esteem,
- o time and money management,
- improving interpersonal relationships,
- o referrals to address health-related issues,
- information about and referral to service agencies to access housing, food, and clothing assistance; and
- o information about how to access other community resources.

Enrollment in job search and/or job search training is not required before placement into EEST. There are no time limits on participation in EEST. It is left to the discretion of the MWA to determine how long individuals are to remain in this activity.

# • Self-Employment Training

(Enter in the OSMIS as the "Self-Employment Training" activity.)

"Self-employment training" is an activity that improves the employability of participants by training them to design and operate a small business or another self-employment venture. Please note this activity is a training component and not for self-employment.

## Vocational Training

(Enter in the OSMIS as the "Vocational Occupational Training" activity.)

"Vocational training" improves the employability of participants by providing training in a skill or trade allowing the participant to move directly into employment. All vocational training activities should be organized educational programs that are directly related to the preparation of individuals for employment in current, emerging, or in-demand occupations, based on local labor market information data.

Individuals may participate in vocational training activities for up to 12 months. Actual hours for this activity can be pre-filled up to 90 days into the future from the current date at the number of hours the participant is expected to participate in the activity. If the MWA chooses this option, participation must be confirmed monthly.

The FAE&T Program funds may be used to cover the actual education costs, as long as the MWA verifies and maintains documentation that there is no other source of financial assistance available to the client. Participants must attempt to secure federal financial aid (not including student loans), such as a Pell Grant, if applicable, for the educational institution/activity.

# Non-Participating ABAWD - Multiple ABAWD Household Member

(Enter in the OSMIS as "Non-Participating ABAWD" activity.)

When a multiple ABAWD household is assigned to the workfare component, and one participant chooses to complete the required hours, the other participant(s) should be entered into the "non-participating ABAWD" activity in the OSMIS.

#### **Pending Deferral Determination**

(Enter in the OSMIS as "Pending Deferral Determination" activity.)

This activity is designed as a placeholder for when an ABAWD TLFA referral type chooses to no longer participate with the MWA and requests MDHHS for a deferral from ABAWD work requirements. If the deferral is granted, the OSMIS will receive a Deferral notice from Bridges and termination will be generated by the system.

## Supportive Services

(Enter in the OSMIS as the "Support Services – Trans, Clothing, Tools, Food Stamp Only.")

"Supportive Services" are services designed to assist participants in overcoming barriers that prevent them from engaging in employment and

training activities. They must be reasonable and necessary, and directly related to participation in activities, <u>not for supporting participants'</u> involvement in unsubsidized employment.

A participant may receive a maximum of \$960 per year for transportation (including car repairs, limited to \$350), school supplies, tools, equipment, clothing, State of Michigan identification card or driver's license, personal hygiene and other grooming supplies and/or services (including haircuts), a physical required for vocational training, or assistance with expunging a criminal record needed to secure employment.

Supportive services may be provided in the form of prepaid allowances based on approximate costs, where the costs are reasonable and verifiable. Alternatively, supportive services may be provided through reimbursement to the participant for the actual cost of services incurred.

Gift cards or vouchers may be provided, as a prepaid allowance, if their use is restricted to specific purchases or services allowed by the program. In addition, case file documentation must clearly identify the supportive service provided.

The case file, action plan or the OSMIS case notes must contain information that explains why the supportive service is necessary for participation in employment and training activities.

The following items are **not allowed** to be paid for with FAE&T funds:

- Automobile insurance
- Automobile ownership/operator taxes (tag and title)
- Automobile purchase
- Drug/alcohol counseling or therapy
- Living stipend
- Mental health treatment
- Personal computers
- Relocation expenses
- Student loans

MWAs have the option to provide a hard cash local match from a non-federal funding source if they wish to provide supportive services in excess of the \$960 annual maximum. The MWAs will be responsible for documenting their use of local matching funds for the provision of supportive services, and for verification that their local match is acceptable.

#### Unsubsidized Employment Prior to Referral

(Enter in the OSMIS as the "Unsub Employment Prior to Referral" activity.)

"Unsubsidized employment prior to referral" is employment in the public or private sector that is not supported by Temporary Assistance for Needy Families (TANF), State General Fund/General Purpose (GF/GP) funds, or any other public program. This activity may also include self-employment.

Please note, the United States Department of Agriculture's Food and Nutrition Service (FNS) does not recognize "unsubsidized employment" as an allowable category of service for FAE&T. Therefore, participants must be enrolled in another activity before opening this employment activity in the OSMIS. Also, supportive service funds **may not** be used to support the participant's employment, and the participant may not enroll in job retention services (JRS).

# **Unsubsidized Employment**

(Enter in the OSMIS as the "Unsubsidized Employment" activity.)

"Unsubsidized employment" is full or part-time employment in the public or private sector that is not supported by TANF, State GF/GP funds, or any other public program. Participation in unsubsidized employment is the fundamental goal for all participants to prepare for self-sufficiency and public assistance case closure. Participants who obtain employment <u>after</u> engaging in other FAE&T activities shall be enrolled in this activity. Employed participants should be encouraged to engage in other employment and training activities to increase the likelihood of achieving self-sufficiency.

The MWA must notify the local MDHHS office if a participant obtains employment while enrolled in the program. Self-employment is not allowable for this activity unless the participant successfully completed an approved self-employment training program.

The FNS does not recognize unsubsidized employment as an allowable category of service for FAE&T. Therefore, employed FAE&T participants must participate in other allowable FAE&T activities in addition to unsubsidized employment. The JRS qualifies as an allowable activity for up to 90 days. The additional E&T activity, or JRS, must be open in the OSMIS before entering the "unsubsidized employment" activity in the OSMIS.

The MWA must create an OSMIS case note and notify the local MDHHS office if an FAE&T participant:

- Voluntarily quits a job of 30 hours or more per week without good cause, or
- Voluntarily reduces hours of employment below 30 hours per week without good cause, or
- Refuses to accept a bonafide offer of employment per MDHHS BEM 233B.

The MDHHS will determine if the individual has good cause.

#### **Job Retention Services**

(Enter in the OSMIS as the "Job Retention Services" activity.)

"JRS" may be provided to individuals who secure full or part-time unsubsidized employment <u>after</u> receiving other employment or training services under the FAE&T Program. This activity provides case management and supportive services to help participants achieve satisfactory performance, retain employment and increase earnings over time.

#### JRS:

- May be provided for a maximum of 90 days per referral;
- May continue for the full 90 days, even if the FAP case closes; and
- If the customer is employed at the time of registration, JRS may only be provided if the participant secures a new job with a new employer or a new position with the original employer.

JRS is limited to 90 days per referral; however, the 90 days do not need to occur concurrently. The OSMIS will track the number of days each participant is enrolled in JRS to ensure that 90 days are not exceeded in any one referral. Only one JRS activity can be open at a time, even if the participant has multiple jobs. The single JRS activity covers multiple jobs in the same time period.

At the end of the 90 days, the participant must be engaged in another E&T activity if their FAP case is still open. The "start date" for the new E&T activity in the OSMIS must be the same date as the "end date" of the JRS activity or an earlier date.

#### **Job Retention Supportive Services**

(Enter in the OSMIS as the "Support Services - Trans, Clothing, Tools, Food Stamp Only.")

"Job retention supportive services" are designed to assist the participant in maintaining <u>employment</u> and can only be provided when a participant is enrolled in the JRS activity. Job retention supportive services follow the same rules as regular supportive services, as described earlier in this policy.

The annual maximum of \$960 is the combination of regular supportive services and job retention supportive services.

The case file, action plan, or the OSMIS case notes must contain information that explains why the supportive service is necessary for participation in JRS.

#### Serving Employed Participants

**Example 1:** A TLFA participant enrolls in FAE&T, engages in an allowable activity, and then secures 15 hours of unsubsidized employment. The

participant is in need of transportation assistance to maintain the new employment. The "unsubsidized employment" activity is opened in the OSMIS to document the participation, and the "JRS" activity is opened to provide mileage reimbursement. The individual continues to participate with an allowable activity for the additional five hours needed to meet the ABAWD work requirement. After 30 days, the job is going well, and employment-related assistance (mileage reimbursement) is no longer needed, but additional training is requested to increase overall self-sufficiency. A training activity is opened, and the "JRS" activity is ended. The "unsubsidized employment" activity remains open. The MWA may now provide regular supportive services to support the training activity, and 60 days of JRS remain available for future use.

**Example 2:** A participant enrolled in FAE&T completes a training component and secures full-time unsubsidized employment. The participant is in need of transportation assistance to maintain the new employment. The "JRS" activity is opened to provide mileage reimbursement, and the "unsubsidized employment" activity is opened to document the participation, Job Retention Services are provided for the next 90 days. After 90 days if the FAP case is still open and the customer is meeting the ABAWD work requirement with employment hours, they would be terminated from the OSMIS as "completed program objectives." If the customer needs additional hours, a new allowable activity should be assigned, and the JRS activity must be ended. If the FAP case is closed, the customer must be terminated from the OSMIS.

## Data Entry in the OSMIS and Documentation

The MWA must capture all required participant and reporting information in the OSMIS. Information is needed for inclusion in federal reports, meeting state and federal policy requirements, and program management. Outcome reports will only include participants with actual hours entered in the OSMIS. In order to receive automated emails from the OSMIS, a case manager must be selected and entered for each participant registration. Data entry for all of the OSMIS activities must be within two days of the start and end dates of participation. Data entry changes for activities and actual hours are limited to the current calendar month and previous calendar month. The OSMIS case notes must be used to document additional case information, as necessary.

Standard forms are attached to the policy to document participation in the assigned activities. The MWAs may create instructions for using the standard forms, as long as the instructions are printed on the back of the form. On all forms, the "Michigan Works!" logo may be deleted, and a local MWA logo may be inserted in its place. The MWA may also replace the title "MWA Staff" with a locally recognized title. Paystubs, official employer records, and third-party verification services may also be used to confirm employment.

(Note: Where signatures are required, electronic signatures may be accepted.)

# **Data Entry Instructions for the OSMIS**

The "customer search criteria" includes client/recipient ID or the MDHHS case number.



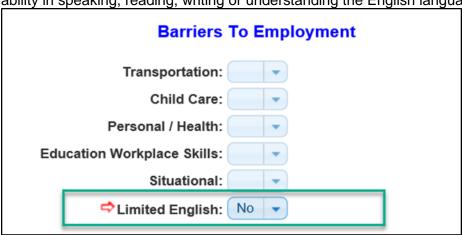
"Participant History" screen for an ABAWD, residing in a TLFA county and electronically referred from Bridges.



"Participant header" containing new data elements from Bridges.

Participant Name	Cust ID	Client/Rec. ID	Case No	Referral Type	Eligibility	Case Review	Extension Began
TAGYA	CAS	.5448	10152.	ABAWD TLFA	06/01/2017	05/31/2018	Jun 2017
FAP Grant	Household Workfare/Work Experience		Monthly Req. Hrs	Multiple ABAWD	TLFA	Countable Months	Regain Eligibility
\$300 for Jul 2017 View All	33 hrs/month as of Jul 2017 <u>View All</u>		80 for Jul 2017. View All	No as of Jul 2017 View All	Yes as of Jul 2017 View All	3 as of 03/31/2017	05/01/2017

Registration screen location to document whether the participant has limited ability in speaking, reading, writing or understanding the English language



#### "Enter Activities" screen.



## **Entering Actual Hours for Activities**

Actual hours must be entered for **all** FAE&T participants. Hours are recorded weekly, and the weeks will be based on the calendar month. It is a best practice to have all entry of hours completed three days before the end of each month. Hours are sent to Bridges nightly. The MDHHS must provide notice to individuals each month if they fail to meet the ABAWD work requirement. Early entry of confirmed hours of participation will prevent unnecessary notifications to the participants. The MWA must notify the local MDHHS office if they receive documentation of participation for the previous month, and the hours cannot be entered due to the OSMIS receiving a FAP case closure and the record being inactivated.

Entering "Actual Hours" can be accessed from either the "Enter Activities" screen or the "Update Activities" screen.



Clicking on "Enter" in the "Actual Hours" column opens the "Enter Actual Hours" screen.

"Enter Actual Hours" screen.

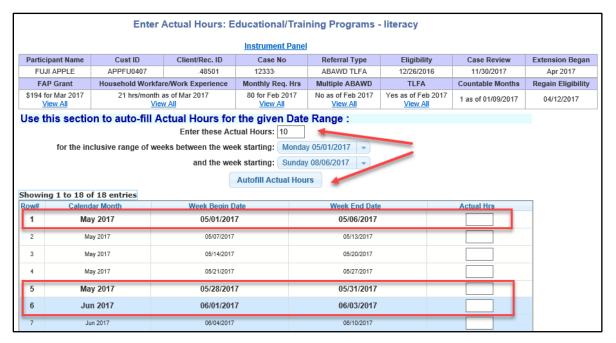


Hours can be entered for each week of an activity. The week time period runs from Sunday to Saturday, and you cannot enter hours for a given week until today's date is subsequent to Sunday's date of the week you want to enter. If you wish to skip a week, you must enter "0" hours for that week.

# **Entering Projected Hours of Employment**

Hours for most activities must be entered week-by-week. However, for employment activities, basic literacy and vocational training hours can be *auto-filled* up to 90 days into the future from the current date.

Auto-Fill Hours on the "Enter Actual Hours" screen

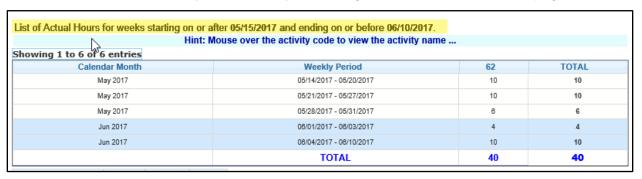


On the "Enter Actual Hours" screen, type in the number of hours for the activity, select the beginning week and the ending week and then click "Autofill Actual Hours." Rows will be highlighted in **bold font** if the week spans across two calendar months.



The hours entered for those weeks will reflect the prorated amount based on the number of days in each calendar month. The MWA may choose to edit the hours before clicking "enter."

Hours entered may be viewed by accessing the "Actual Hours Status" page.



# Changing the Activity "Begin Date" and/or "End Date," and the Effect on "Actual Hours"

Weeks in which "Actual Hours" are entered must fall between the "Begin Date" and the "End Date" of the activity.

#### **Activity "Start Date" Change**

If hours have been entered for an activity and the "Start Date" is then moved backward, the OSMIS will create these weeks and enter "0" for the new weeks added.

The original activity "start date" is December 12th.



The activity "start date" is moved back a week to December 5<sup>th</sup>.



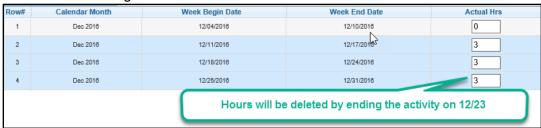
The new week is added and zero hours display in the "Actual Hrs" field. The MWA can edit this value if participation was documented for this timeframe.

Row#	Calendar Month	Week Begin Date	Week End Date	Actual Hrs
1	Dec 2016	12/04/2016	12/10/2016	0
2	Dec 2016	12/11/2016	12/17/20185	3
3	Dec 2016	12/18/2016	12/24/2016	3
4	Dec 2016	12/25/2016	12/31/2016	3

# **Activity "End Date" Change**

If hours have been entered for an activity and the "End Date" is changed to a date prior to weeks for which hours have already been entered, the system will delete any hours past the "End Date" of the activity.

The hours entered for the week of December 25<sup>th</sup> will be deleted when the "End Date" is changed to December 23<sup>rd</sup>.



The hours for the week of December 25<sup>th</sup> have been successfully removed.

Row#	Calendar Month	Week Begin Date	Week End Date	Actual Hrs
1	Dec 2016	12/04/2016	12/10/2016	0
2	Dec 2016	12/11/2016	12/17/2016	3
3	Dec 2016	12/18/2016	12/24/2016	3

# **Entry of Educational and Training Outcomes**

The MWA must enter into the OSMIS all participants' educational and training outcomes prior to termination/case closure. As a best practice, the MWA should enter educational outcomes when they are attained. In the registration component of the OSMIS, case managers will be required to

indicate whether or not the participant obtained a high school diploma/GED, an associate's degree, another post-secondary degree, or other training credentials during the enrollment. All educational and training outcomes must be verified by the MWA prior to being entered into the OSMIS.

## **Ending Participation and Termination Reasons in the OSMIS**

The MWA retains the participant until:

- notified by the MDHHS of the participant's FAP ineligibility (except for those engaged in JRS, as described earlier in this policy);
- the participant chooses not to participate in FAE&T;
- the participant moves out of a county subject to TLFA;
- the participant is deferred from the ABAWD work requirement; or
- notified by MDHHS that the participant chose to be referred back to the MDHHS for participation in SICS.

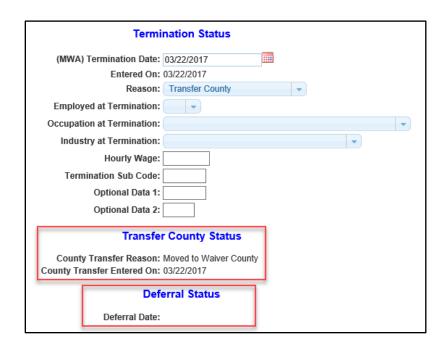
The MWA case manager will be notified via an email message when a FAP case closure is received, and termination is required.

For customers who stop participating but are still receiving FAP, the MWA may keep the registration active for up to 100 days. This will allow the customer to re-engage without a new referral from Bridges. The assigned activity should remain open but hours should not be entered. If the customer does not re-engage, the OSMIS will terminate the participant as "System Termination – No Activity."

**Transfer County Status:** A new section has been added to display the "Transfer County Reason and Date received from Bridges" when certain customers move out of, or into, a TLFA county.

Participants who move out of a TLFA county are not subject to TLFA for the month of the move. The customer must request their MDHHS caseworker to refer them again if they want to volunteer to participate in the FAE&T Program in the new county, if available. If the customer was participating in a county with a waiver and then moves to a county subject to TLFA, the original referral would be terminated as Transfer County, and a new referral will be generated for the TLFA County.

**Deferral Status:** A new section has been added to display the Deferral Date received from Bridges. If the customer is employed and receiving JRS when the deferral is received, the customer may choose to remain with the MWA for the duration of the JRS. Otherwise, the customer should be terminated.



When MDHHS places a participant in the SICS activity in Bridges, the OSMIS registration will be terminated with "System Termination – Customer returned to DHHS."

If a referral is received from Bridges and the individual is currently active in the OSMIS, the new referral will be accepted, and the current registration will be terminated.

Other than system terminations, the MWA must terminate the participant's record in the OSMIS by choosing a termination reason below:

- Case Closure
- Completed Program Objectives
- Deferred
- Other
- Transfer County

#### Confidentiality

The information contained in all program case records is confidential and may be released only under limited circumstances. The MDHHS confidentiality policy can be found in the <u>Bridges Administrative Manual</u>.

The privacy of individuals must be safeguarded, and the MWA may not release any information related to an individual participant. A customer, however, may consent to a release of information upon signing a release of information form. The MWA is also allowed to release aggregate data about participants. Aggregate data includes the total number of participants employed, the number of people enrolled in activities, etc. The MWA must adhere to these guidelines when administering this program.

Action:

MWA officials shall take the appropriate action to comply with this policy issuance.

**Inquiries**: Questions regarding this policy issuance should be directed to your

Welfare Reform state coordinator at 517-373-6234. The information contained in this policy issuance will be made available in an alternative

format (large type, audio tape, etc.) upon request to this office.

Expiration Date:

None

WS:LM:pv Attachment



# **ACTIVITY LOG**

Sunday:	to Saturday	Due	Date: Time:				
Participant Nam	ne:	Clien	t/Recipient ID:				
Signature of Pa	rticipant:		Required Hours:				
that I am only ab so voluntarily.	By signing above, I agree the information I have provided is true to the best of my knowledge; and, if assigned to Workfare, I understand that I am only able to complete the number of hours assigned by the MWI staff. Any amount of time I have completed in excess was done so voluntarily.						
(Optional Data) N	lame of 2 <sup>10</sup> person refe	rred from a Multiple ABAWD Househo	old:				
In accordance wi	th the Fair Labor Stand	ard Act, your maximum monthly hours	imit for WorkfareWork Experience is				
ACTIMITY							
Check one:		vice center) 🔲 Job Search Trainin Fraining 🔲 Vocational Training 🔲	g 🔲 Workfare 🔲 Work Experience 🔲 Basic Literacy Dual Program Enrollment				
Date	Actual Hours of Participation	Name of Worksite	Person Verifying Hours of Participation Must Complete the Following				
			Name:				
			Phone/Email:				
			Signature:				

Total Hours:

WR-260 Activity Log (Revised 06/08/2017)
Equal Opportunity Employer/Service Provider. Michigan Relay Center (800)649-3777. Auxiliary Aids and Services Available to Individuals with Disabilities



# **VERIFICATION OF EMPLOYMENT HOURS**

Participant First and Last Name:	Client/Recipien	Client/Recipient ID:				
EMPLOYMENT INFORMATION Section 1-To be completed by Employer or by MW! Staff if via phone contact Employer Name:						
Lingity et isome.						
Employer Address:	City:	State:				
Phone:	Fax:					
Date Employment Began:	Average Actual Weekly Hours Worked:					
Wage: Job Tit	le:					
If available, please provide:						
Date of First Paycheck:						
How Often Paid? Weeklγ□	Twice Monthly D Every 2 Weeks D Monthly	<b>y</b> 🗆				
Day of Week Paid: Monday □	Tuesday ☐ Wednesday ☐ Thursday ☐	Fríday 🗆				
Section 2 – To be completed by Emplo	oyer					
First and Last Name of Person Comple	eting Form: Title:					
Signature:	Date:					
Section 3 – To be completed by MW!	Staff if verified via phone					
Name of Employer's Staff Verifying Er	nployment Hours:					
Name of MW! Staff:						
Title of MW! Staff:						
Date of Phone Call:						



# **OUTSIDE JOB SEARCH CONTACT LOG**

Participant Name:		Client/Recipient ID:	Due Date: Time:		
Week Begin Date (Sunday):		Week End Date (Saturday):	MWI Staff Name:		
Date	Employer Name & Phone Number	Employer Address or Website Address	Activity	Actual Time Spent	
			☐ Interview ☐ Application	☐ 15min ☐ 30min	
			☐ Resume ☐ Follow up	☐ 45min ☐ 60min	
			☐ Internet ☐ Other:	☐ More than 1 hour:	
			☐ Interview ☐ Application	☐ 15min ☐ 30min	
			☐ Resume ☐ Follow up	☐ 45min ☐ 60min	
			☐ Internet ☐ Other:	☐ More than 1 hour:	
			☐ Interview ☐ Application	☐ 15min ☐ 30min	
			☐ Resume ☐ Follow up	☐ 45min ☐ 60min	
			☐ Internet ☐ Other:	☐ More than 1 hour:	
			☐ Interview ☐ Application	☐ 15min ☐ 30min	
			☐ Resume ☐ Follow up	☐ 45min ☐ 60min	
			☐ Internet ☐ Other:	☐ More than 1 hour:	
			☐ Interview ☐ Application	☐ 15min ☐ 30min	
			☐ Resume ☐ Follow up	☐ 45min ☐ 60min	
			☐ Internet ☐ Other:	☐ More than 1 hour:	
			☐ Interview ☐ Application	☐ 15min ☐ 30min	
			☐ Resume ☐ Follow up	☐ 45min ☐ 60min	
			☐ Internet ☐ Other:	☐ More than 1 hour:	
			☐ Interview ☐ Application	☐ 15min ☐ 30min	
			☐ Resume ☐ Follow up	☐ 45min ☐ 60min	
			☐ Internet ☐ Other:	☐ More than 1 hour:	
Participant Sign	ature:	Total	Hours Above:		

By signing above, I agree the information provided is true to the best of my knowledge.

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