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Workforce Development Agency, State of Michigan (WDASOM)
Policy Issuance (PI): 12-17

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To: Michigan Works! Agency (MWA) Directors

From: Gary Clark, Director, Office of Talent Development Services
Workforce Development Agency
SIGNED

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

Programs Affected: FAE&T

Rescissions: None

References: Food and Nutrition Act of 2008, 7 U.S.C. § 2011 (2008) (originally enacted as Food Stamp Act (FSA) of 1977, as amended, Public Law (PL) No. 88-525 [1964])

Code of Federal Regulations (CFR), Title 7, Department of Agriculture (7 CFR 273.7)

Food, Conservation, and Energy Act of 2008 (2008 Farm Bill), PL No. 110-246 (2008) (codified as amended at 7 U.S.C. § 2015)

CFR, Title 7, Department of Agriculture (7 CFR 277) (OMB Circular A-87) Cost Principles for State, Local and Indian Tribal Governments

Background: Congress established the FAE&T Program under the FSA of 1977, as amended, to assist members of households participating in the Food Assistance (FA) program in gaining skills, training, work, or experience to increase their ability to obtain regular employment. The State of Michigan



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FAE&T Program is jointly administered by the Michigan Department of Human Services (DHS) and the WDASOM.

The FAE&T Program is designed to establish a connection to the labor market for Able Bodied Adults Without Dependents (ABAWDs). The MWAs serve the ABAWDs, with oversight and technical assistance from the WDASOM, and DHS local offices will provide services for the Non-ABAWD FAE&T population. The State of Michigan operates a voluntary program. Therefore participants should not be disqualified from the FAE&T Program for failure to comply with the requirements of a specific activity. The participant may be moved to a different activity to continue participation. Through the joint efforts of these two departments, employment and training services are available to all FA applicants and recipients in the State of Michigan who volunteer to participate.

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 WDASOM 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 FA participants.

ABAWDs can volunteer to participate in the Self-Initiated Community Services (SICS) Program administered by the local DHS offices, and the employment and training program administered by the MWAs.

Policy:

Program Objective

The FAE&T Program will help ABAWDs, who volunteer, to participate in employment and training activities that will assist the individual in obtaining and retaining employment.

Eligibility

The DHS is responsible for determining who is eligible to be served under the program and to facilitate the electronic referral process via Bridges to the One-Stop Management Information System (OSMIS). The MWA is responsible for assessing the employment and educational needs of ABAWDs who volunteer to participate in the FAE&T Program.

To be eligible, participants must be 18 through 49 years old (beginning the first calendar month after the 18th birthday through the last calendar month before the 50th birthday).

Participant Flow

- The MWAs should coordinate with their local DHS office to develop a process for delineating how many FAE&T referrals the MWAs will be able to accept into the program, and the frequency of making referrals within specific time periods. If the DHS has more potential referrals than the MWA can serve, these individuals will be referred by the DHS to the SICS component that is offered through the DHS.
- The DHS will refer eligible participants to the MWA, via Bridges to the OSMIS.
- FAE&T participants may also obtain eligibility documentation from their local DHS offices and then contact the MWAs directly as self-referrals.
- The MWA schedules the participant for the FAE&T Program Orientation.
- The MWA completes the Individual Service Strategy with the participant.
- Job Search/Job Search Training followed by Workfare will be the primary activity for all FAE&T participants (unless a participant is placed directly into an education/training activity).
- The MWA retains the participant until notified by the DHS of the participant's FA ineligibility, the participant's refusal to continue participation, or the participant's choice to be referred back to the DHS for participation in SICS.

Program Activities

Program Orientation

A program orientation must be available to participants within five days of their referral from the DHS. The participant's case remains open until the last date to attend the program orientation, which is indicated in the *Last Date to Attend Orientation* field of the OSMIS. The orientation should consist of an overview of the program, responsibilities of the participant, and the consequences for noncompliance. Adverse action and disqualification of FA benefits will only apply to clients who refuse employment.

All FAE&T activities permit a stronger emphasis on case management. Intensive case management may be provided on a continuing basis throughout participation in all FAE&T activities. The hours spent by ABAWDs in case management activities are included within hours of allowable activities.

Job Search with Workfare and Job Search Training with Workfare

Job Search must directly enhance the employability of the participant. Job Search includes Job Club and counseling. For the first 30 days, job search can be a full-time component of the Workfare activity. Thirty days of full-time Job Search/Job Search Training (i.e., up to 20 hours per week) will count toward meeting Michigan's FAE&T Program participation requirement.

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 the Michigan Occupational Information System and the Pure Michigan Talent Connect system.

If a participant has completed 30 days of full-time job search/job search training, any additional Job Search/Job Search Training activities must comprise less than half (e.g., 49 percent) of the required hours of participation. It is recommended that the MWAs utilize the OSMIS tickler file to determine when 30 days of full-time Job Search/Job Search Training has elapsed.

Job Search/Job Search Training, if provided in conjunction with other employment and training activities, must be less than ten hours per week, for a combined total of 20 hours per week

Participants who are not successful in obtaining employment of at least 20 hours per week during the initial 30-day job search period must be placed in a Workfare slot or into another allowable education or training activity.

The limitation on the number of hours of participation in job search activities does not apply if the Job Search/Job Search Training activities are operated under Title 1 of the Workforce Investment Act (WIA), or Section 236 of the Trade Adjustment Assistance (TAA) Act.

Workfare

Workfare is a work component in which FA recipients perform work in a public service capacity. Workfare participants receive compensation in the form of their monthly FA allotment in lieu of wages. 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.

Participants, who are not successful in obtaining employment of at least 20 hours per week (80 hours per month average) during the initial 30-day Job Search period, may be placed in a Workfare slot with a public or private non-profit agency.

Workfare must comply with these conditions:

- Workfare must not provide any work that has the effect of replacing or preventing the employment of an individual not participating in Workfare. Vacancies due to hiring freezes, terminations, or layoffs must not be filled by Workfare participants, unless it can be demonstrated that the vacancies are a result of insufficient funds to sustain former staff.
- Workfare 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, such as 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 in the FAE&T Program are covered by workers' compensation as outlined in the DHS Bridges Eligibility Manual 232 at <http://www.mfia.state.mi.us/olmweb/ex/bem/232.pdf>.
- 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 Program.
- Workfare jobs must not, in any way, infringe upon the promotional opportunities that would otherwise be available to regular employees.
- Workfare jobs must not be related, in any way, to political or partisan activities.

After the initial 30-day period in full-time Job Search, participants may continue (but are not required) to conduct Job Search during their time spent in Workfare. The combined hours of required participation in Job Search and Workfare may not exceed the number of hours equal to the FA benefit for that month, divided by the higher of the applicable state or federal minimum wage.

While in Workfare, the MWA may continue efforts to assist the participant in obtaining employment, e.g., sending out the participant's resume and setting up employment interviews. The participant will remain in the Workfare slot and continue to be served by the MWA until he or she obtains unsubsidized

employment, is placed in another FAE&T activity, chooses to be referred back to the DHS for participation in SICS, appears to meet deferral criteria, or refuses to continue participation.

Participants may also attend Employment Enhancement Skills Training (or another educational or training activity) in conjunction with Workfare to meet their participation requirements. The required hours of participation in Employment Enhancement Skills Training (or another educational or training activity) in conjunction with Workfare cannot exceed the combined hours of participation, which are determined by dividing the FA benefit by the higher of the applicable state or federal minimum wage.

The total amount of time spent monthly by a voluntary participant in FAE&T Program activities, combined with hours worked in Workfare and unsubsidized employment, is unlimited. Participants may volunteer to participate in hours above the required amount if permitted by the MWA.

Educational and Training Programs

- Literacy and Academic Skills Training

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

Individuals may participate in educational activities to meet their 20 hours per week requirement (for a monthly average of 80 hours). 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. 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.

- Employment Enhancement Skills Training

The goal of Employment Enhancement Skills Training is to increase or develop participants' motivation to begin and continue participation activities relating to employment. It is designed to stabilize participants living circumstances and facilitate successful participation in the program. This may include activities such as improving self-image; motivational activities, which include prioritizing work and building or improving self-

esteem; time and money management; improving interpersonal relationships; referrals to address health-related issues; information about and referral to service agencies in order to access housing, food, and clothing assistance; and information about how to access other community resources.

Enrollment in Job Search/Job Search Training is not required before placement into Employment Enhancement Skills Training. There are no time limits on participation in Employment Enhancement Skills Training. It is left to the discretion of the MWA to determine how long individuals are to remain in this activity.

- **Vocational Training**

Vocational Training improves the employability of participants by providing training in a skill or trade allowing the participant to move directly into employment. Placement into unsubsidized employment, in conjunction with enrollment in Vocational Training activities, is not required. Participants may meet their 20 hours per week participation requirement (for a monthly average of 80 hours) by participating in a Vocational Training activity. Individuals may participate in Vocational Training activities for up to six months.

Eligible FAE&T participants must be in an approved FAE&T Program activity, such as Job Search with Workfare, before their entry into Vocational Training.

The FAE&T Program funds may be used to cover the actual educational costs as long the MWA verifies and maintains documentation that there is no other source of financial assistance available to the client.

Once an FAE&T participant enters a Vocational Training program, the fact that the person subsequently enters unsubsidized employment will not adversely affect the participant's Vocational Training.

Job Retention Services

Participants shall be placed in the Job Retention Services activity when they secure employment after receiving other employment or training services under the FAE&T Program.

The Job Retention Services activity provides case management and supportive services for up to 90 days in order to reduce barriers and help the participant maintain employment.

The MWA must place the participant in *Job Retention Services* within OSMIS to track participants' involvement in this activity.

It is recommended that the MWAs utilize the OSMIS tickler file to determine when 90 days of Job Retention Services have elapsed. At the end of the 90 days, or earlier if Job Retention Services are no longer requested, the participant shall be terminated in OSMIS with the reason "Completed Program Objectives."

Enrollment in WIA, State, or Local Projects or Programs (Dual Program Enrollment)

An FAE&T participant may be enrolled in this component if he/she is dually enrolled in other employment and training programs, such as the WIA or other state or local projects/programs.

FAE&T participants may meet their 20 hours per week participation requirement by participating in other employment and training programs that would be allowed under other funding sources (e.g., the WIA or Section 236 of the TAA Act). The MWA may coordinate placement in employment and training programs through other allowable funding sources. As a result, the MWA must ensure that participants meet the eligibility requirements of the other employment and training program, and that the other program meets the participation requirements under the FAE&T Program.

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 JET).*

Performance Measure

In accordance with WDASOM/DHS agreement, if DHS provides a significant enough increase in referrals above FY 2010 levels, each MWA should plan to increase participant enrollment by a proportional level.

Use of Funds

FAE&T funds may only be used to provide employment and training and support services to individuals who are referred to the MWA by the DHS, via Bridges to the OSMIS.

FAE&T program funds may also be used to market the program to potential volunteers. Marketing expenses must be reasonable and necessary to promote the FAE&T program. The MWA may collaborate with local partners, such as food banks, vocational and technical training centers, and community centers

to reach potential volunteers. It is important to convey the positive aspects of the FAE&T program to potential participants.

FAE&T funds may be used to serve FA Program applicants from the date of application until the application is approved, denied, or withdrawn. ABAWDs who are determined eligible for FA will continue to be eligible for FAE&T services during the time period they receive FA benefits or through the 90th day of Job Retention Services activity.

FAE&T funds shall not be used for transporting applicants to and from the local DHS office to complete FA applications or to provide assistance in completing FA applications.

Program Operations

Program operation costs are not to exceed an average of **\$4,000** per participant.

Supportive Services

Supportive services are expenses that are reasonable and necessary and directly related to participation in the FAE&T Program. A participant may receive a maximum of \$50 per month for transportation, clothing, and tools. Supportive services may be provided in the form of prepaid allowances based on actual costs or through reimbursement to the participant for the actual cost services incurred. For the purpose of this policy, “per month” is defined as every 30 calendar days.

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 \$50 per person, per month limitation. 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.

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) 335-5858. The information contained in this policy issuance will be made available in alternative format (large type, audio tape, etc.) upon request to this office.

Expiration Date: None

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