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DEPARTMENT PHILOSOPHY

The Family Independence Program (FIP) is temporary cash assistance to support a family's movement to self-sufficiency. The recipients of FIP engage in employment and self-sufficiency related activities so they can become self-supporting.

DEPARTMENT POLICY

Federal and state laws require each work eligible individual (WEI) in the FIP group to participate in Partnership. Accountability. Training. Hope. (PATH) or other employment-related activity unless temporarily deferred or engaged in activities that meet participation requirements. These clients must participate in employment and/or self-sufficiency related activities to increase their employability and obtain employment. PATH is administered by the Talent and Economic Development (TED), State of Michigan through the Michigan one-stop service centers. PATH serves employers and job seekers for employers to have skilled workers and job seekers to obtain jobs that provide economic self-sufficiency. PATH case managers use the One-Stop Management Information System (OSMIS) to record the clients' assigned activities and participation.

WEIs not referred to PATH will participate in other activities to overcome barriers so they may eventually be referred to PATH or other employment service provider. Michigan Department of Health & Human Services (MDHHS) must monitor these activities and record the client's participation in the Family Self-Sufficiency Plan (FSSP).

A WEI who refuses, without good cause, to participate in assigned employment and/or other self-sufficiency related activities is subject to penalties. For more about penalties; see BEM 233A. See BEM 230B and BEM 233B for FAP employment requirements.

INFORMING CLIENTS

The MDHHS-1171 Info, Information Booklet, provides each applicant with information about the work requirements. The same information about work requirements is provided in the MI Bridges online application. Review information found in the Information Booklet, or direct the client to review his/her MI Bridges online application and the DHS-1538, Work and Self-Sufficiency Rules, with clients at application, redetermination and when a change in

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circumstances might affect the person's required hours of participation. Review all the following information:

- Work requirements and reasons why a person may be deferred from work participation.
- Rights and responsibilities.
- Self-sufficiency requirements.
- Penalties for non-compliance, good cause, the triage and hearing processes and good cause.
- Right of deferred persons to participate.
- Reporting requirements, including income verification and the DHS-630, Weekly Activity Log, in this item.
- FIP time limit restrictions.
- Prohibited use of FIP to purchase lottery tickets, alcohol or tobacco. It is also prohibited for gambling, illegal activities, massage parlors, spas, tattoo shops, bail-bond agencies, adult entertainment, cruise ships or other nonessential items.

REASONABLE ACCOMMODATION

Disability Definition

Section 504 of the Americans with Disabilities Act (ADA) defines a disability as a physical or mental impairment that substantially limits one or more major life activities; or a history of such an impairment; or being regarded as having such an impairment. Examples of major life activities include: thinking, learning, taking care of oneself, maintaining social relationships, sleeping, communicating, etc.

Many FIP clients have disabilities or live with a spouse or child(ren) with disabilities that may need accommodations to participate in assigned activities. The needs of persons with disabilities are highly individual and must be considered on a case-by-case basis. MDHHS must make reasonable efforts to ensure that persons with disability-related needs or limitations will have an effective and meaningful opportunity to benefit from MDHHS programs and services to the same extent as persons without disabilities. Efforts

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to accommodate persons with disabilities may include modifications to program requirements, or extra help, as explained below. Failure to recognize and accommodate disabilities undermines efforts to assist families in achieving self-sufficiency.

When a client requests reasonable accommodation in order to participate, MDHHS and the employment service providers will consider the need for applying the above requirements.

A disability as defined above that requires reasonable accommodation must be verified by an appropriate source, such as a doctor, psychologist, therapist, educator, etc. A client may disclose a disability at any time. Failure to disclose at an earlier time does not prevent the client from claiming a disability or requesting an accommodation in the future.

Screening and Assessment

Be alert to undisclosed or unrecognized disabilities and offer screening and assessment as appropriate. Help clients understand that MDHHS can only offer accommodations if a disability is verified. Clients are screened for disabilities on the DHS-619, Jobs and Self-Sufficiency Survey and the Family Automated Screening Tool (FAST), which ask questions about medical problems, special education and symptoms of mental illness.

Inform clients requesting accommodation or deferral that they may be required to attend appointments with doctors, psychologists, or others to ensure that appropriate accommodations or deferrals are made. Explain that assessment is voluntary but failure to cooperate with assessment may prevent MDHHS from providing a deferral or accommodation. Also inform the client of the requirement to engage in self-sufficiency and family strengthening activities even if they are deferred from PATH or work activities and may be subject to penalties if they do not participate as required.

Accommodation

When information provided by an appropriate source indicates the need for reasonable accommodation, do the following:

 Obtain a DHS-54A, Medical Needs, or the DHS-54E, Medical Needs-PATH, from a qualified medical professional listed on the form.

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- Consult Michigan Rehabilitation Services (MRS) if additional information about appropriate accommodations is needed or when you need advice.
- Document the accommodation in the Other MWA referral comments section of the Employment Services - Details screen, and on the Family Self-Sufficiency Plan (FSSP).

Modifications or extra help may include, but are not limited to, the following:

- Reduced hours of required participation.
- Extended education allowances including more than 12 months allowed for vocational education.
- Extended job search/job readiness time limit.

Justification for a plan including reasonable accommodation is documented in the client's FSSP and the Individual Service Strategy (ISS) with the one-stop service center.

When clients with verified disabilities are fully participating to their capability, they are counted as fully engaged in meeting work participation requirements regardless of the hours in which they are engaged, even if they do not meet federal work requirements.

MANDATORY PARTICIPATION IN EMPLOYMENT SERVICES

All WEIs, unless temporarily deferred, must engage in employment that pays at least state minimum wage or participate in employment services. WEIs who are temporarily deferred are required to participate in activities that will help them overcome barriers and prepare them for employment or referral to an employment service provider.

PATH

Most WEIs are referred to PATH provided by the one-stop service center serving the client's area when one of the following exists:

- A WEI applies for FIP.
- A WEI applies to be a member added to a FIP group.
- A WEI is no longer temporarily deferred from employment services.

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Note: An 18-year-old **adult** group member is considered a WEI and must attend PATH, regardless of school attendance; see BEM 228, Required Hours for Participation of WEIs.

The last date for a client to attend PATH is 15 calendar days from the date of the PATH referral and the DHS-4785, PATH Appointment Notice, are sent. If the client calls to reschedule before the 15th day, extend the Last Date for Client Contact on OSMIS. Either MDHHS or the one-stop service center have the capability of extending this date.

Note: A task and reminder is sent to the worker when a participant did not appear at PATH within the 15 day period. A pending application is automatically denied.

MDHHS workers indicate the minimum number of hours a client must participate in employment and/or self-sufficiency-related activities on the Employment Services - Details screen in Bridges. Clients may have limitations that support the need for special accommodations, which may include a reduction in the number of hours they are able to participate. In this instance, refer to policy outlined above under Reasonable Accommodations.

The one-stop service centers use the minimum required hours indicated in the FSSP to initially assign clients to activities that meet federal minimum participation requirements, up to 40 hours per week, unless reasonable accommodation policy applies and is documented.

Other Service Providers

The following groups must be referred to other service providers (not PATH) when applicable:

Tribal Agencies

Tribal agencies serve some clients under the Native Employment Works Program. Refer those who may be served by a tribal agency.

Special Needs Participants

Determine appropriate participation and types of supports for the following groups considering Reasonable Accommodations earlier in the item. Reasonable accommodations are selected from the

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verification for the deferral reason on the Employment Services Details screen in Bridges.

Minor Parent

A minor parent, aged 16 or 17, who has graduated from high school must participate in PATH or other service provider. See BEM 201, for the definition of minor parent and BEM 245 for the definition of high school.

Clients in Treatment Plans

Certain clients have circumstances which may make their participation in employment and/or self-sufficiency related activities problematic. Unless otherwise deferred, they must be referred to PATH. Indicate the appropriate Additional Information from the drop-down list on the Employment Services-Details screen in Bridges.

Examples of these circumstances include:

- Prescribed medication to control mental illness.
- Ongoing substance abuse treatment.

Former Recipients

A client whose benefits are terminated continues to be eligible for contracted employment and/or self-sufficiency related activities (for example, counseling) until the contractual obligations have been met or the contract has been terminated, whichever occurs first.

Refugees are eligible for refugee-specific employment services for the first five years they are in the country, regardless of whether they receive assistance from MDHHS; see BEM 630, Refugee Assistance Program. EMPLOYMENT SERVICES

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MANDATORY
PARTICIPANTS
DELAYED
REFERRAL
(DEFERRED) TO

WEIs meeting one of the following criteria are only temporarily not referred to an employment service provider because they may continue to count in Michigan's federal work participation rate. They are required to participate in activities that will increase their full potential, help them overcome barriers and prepare them for employment or referral to an employment services provider as soon as possible. Enter the specialist assigned activities into the FSSP to track participation of temporarily deferred WEIs; see BEM 228.

If the WEI refuses or fails to provide verification of a deferral when required, refer him/her to PATH.

Notify PATH service provider immediately by phone or email when a client who was previously referred is granted a temporary deferral.

Information entered in Bridges data collection will create the following participation/deferral reasons.

Meeting Participation Through Education

Minor Parent Grantees

Minor parent grantees who attend high school full-time are regarded as fully engaged in required activities even though his/her education does not meet the federal requirements. Enter the education activity on the FSSP under the Goal and Activities tab, Non-Core Activities, High School Completion/GED. Enter 30 hours per week of actual participation upon receipt of verification the student is attending.

Working 40 Hours Per Week

Applicants and members added to the FIP group who are working a minimum of 40 hours per week at the state minimum wage are not

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referred to PATH. This client's participation in employment is meeting requirements.

Care of a Child or Post-Partum Recovery

Disregard one parent of a child under the age of two months up to two months when the newborn is in the home. Disregard a mother for post-partum recovery up to two months.

Lack of Child Care

In the Employment Services - Detail screen in Bridges, select the *No Child Care for Child Under Six* deferral reason and reply to questions regarding child care when a single parent personally provides care for a child under age six in the FIP EDG and adequate child care is unavailable. Adequate child care meets all the following:

- Appropriate. The care is appropriate to the child's age, disabilities and other conditions.
- Reasonable distance. The total commuting time to and from work and child care facilities does not exceed three hours per day.
- Suitable provider. The provider meets applicable state and local standards. License exempt providers who are not licensed by the Michigan Department of Licensing and Regulatory Affairs (LARA) Child Care Licensing Bureau (CCLB) must meet Child Development and Care (CDC) enrollment requirements.
- Affordable. The child care is provided at the rate of payment or reimbursement offered by the CDC program.

Clients who need assistance in finding a licensed provider should be referred to Great Start to Quality, the online early learning resource site, at www.greatstarttoquality.org. All active licensed providers in good standing are searchable. If additional assistance is needed, clients can be referred to 877-614-7328 to reach the Great Start to Quality Resource Center serving their county. Resource centers can provide personal consultation for families in need of child care. If a provider cannot be located, the client needs to provide verification.

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If a provider is located within 10 calendar days, end the deferral on the Employment Services Detail screen in Bridges. Bridges will generate a referral to PATH as well as generate the DHS-4785 once the specialist runs and certifies eligibility.

If the client is unable to obtain child care that meets the conditions above within 10 calendar days, the client may be deferred from referral to PATH for 90 days or until the child turns age six, or until appropriate care is available, whichever is sooner. Bridges will change the deferral code to mandatory participant at the end of the deferral period. Once the specialist runs and certifies eligibility, Bridges will generate the referral to PATH and the DHS-4785 will be generated. Document the referrals and results in the case record. The Deferral/Participation Reason is identified as *No Child Care Available*.

Pregnancy Complications

Clients requesting a deferral from PATH due to pregnancy complications must provide medical verification that indicates that they are unable to participate. An individual requesting deferral greater than 90 days for pregnancy complications is not subject to the requirements for establishing long-term incapacity later in this item.

Domestic Violence

Domestic violence means one or more threats or acts against any family member concerning any of the following:

- Physical injury.
- Sexual abuse.
- Sexual involvement of a dependent child.
- Mental/emotional abuse.
- Neglect or deprivation of medical care.

Defer parents and caretakers with a documented claim of threatened or actual domestic violence, against themselves or their dependent children, that can reasonably be expected to interfere with work requirements.

Assist the client to develop a plan intended to overcome domestic violence as a barrier to self-sufficiency. The plan may include participation in services for domestic violence victims or receipt of related professional care. Specific activities which might reasonably

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be expected to endanger the client should be avoided. Document the clients' agreement in the FSSP.

The maximum deferral period is three months. Bridges will change the deferral code to mandatory participant at the end of the deferral period. Bridges will generate a referral to PATH as well as the DHS-4785.

With documented supervisor approval, extensions are permitted in three-month increments.

Use the client's written statement as documentation unless there is sufficient reason to question it. If the statement is questionable, request further documentation, including any of the following:

- Service from a domestic violence provider.
- Medical records.
- Court records, such as personal protection order or petition.
- Police records (for example, domestic disturbance response).
- School records (for example, statement by a school counselor).
- Statement by a licensed therapist or counselor.
- Other case record information (including children's services).

Note: All information concerning domestic violence is confidential; see BAM 310, Confidentiality and Public Access to Case Records.

VISTA, Job Corps, AmeriCorps

Participants in VISTA, Job Corps or AmeriCorps meet participation requirements if the client is participating in this activity for at least the minimum number of required hours. These clients are not referred to PATH unless they wish to participate in the one-stop service center education and training program.

Note: When a participant in VISTA, Job Corps or AmeriCorps participates less than the minimum number of required hours, refer the client to PATH as a mandatory participant.

Use OSMIS case notes to inform PATH of the client's participation in VISTA, Job Corps or AmeriCorps.

Disability

Information recorded in Bridges will defer the following:

Recipients of RSDI based on disability or blindness.

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 Persons found eligible for RSDI based on disability or blindness who are in non-pay status.

FSSP Data Entry

Assign clients to self-sufficiency or barrier removal activities as medically permissible. Enter these activities on the FSSP in the Other activity category listed under the Goals and Activities tab.

Short-Term Incapacity

Persons with a mental or physical illness, limitation, or incapacity expected to last less than three months and which prevents participation may be deferred for up to three months.

Verify the short-term incapacity and the length of the incapacity using a DHS-54A, Medical Needs, or DHS-54E(an N.P. or P.A. can complete the DHS 54E), Medical Needs - PATH, or other written statement from an M.D./D.O./P.A./N.P Set the medical review date accordingly, but not to exceed three months.

Do not advise clients with a short-term incapacity to apply for SSI.

Long-Term Incapacity

At intake, redetermination or anytime during an ongoing benefit period, when an individual claims to be disabled or indicates an inability to participate in work or PATH for more than 90 days because of a mental or physical condition, the client should be deferred in Bridges. Conditions include medical problems such as mental or physical injury, illness, impairment or learning disabilities. This may include those who have applied for RSDI/SSI.

For FIP applicants already receiving MA based on their own disability and/or blindness, meet the medical deferral requirements for incapacitated up to the medical review date stated on the DHS-49-A, as determined by the DDS 7/1/2015 and after.

Note: A person with a condition or impairment that is pregnancy-related must be deferred for a problem pregnancy. These individuals should **not** be referred to the DDS or to an SSI Advocate if the **only** conditions or impairments are due to pregnancy: see Pregnancy Complications in this item.

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Step One: Establishment of Disability

Once a client claims a disability, he/she must provide MDHHS with verification of the disability when requested. The verification must indicate that the disability will last longer than 90 calendar days. If the verification is not returned, a disability is not established. The client will be required to fully participate in PATH as a mandatory participant; see Verification Sources in this item.

In Bridges, the Deferral/Participation Reason is *Establishing Incapacity* while awaiting the verification that indicates the disability will last longer than 90 days.

At application, once the client has verified the disability will last longer than 90 days, the application may be approved, assuming all other eligibility requirements have been met.

If the returned verification indicates that the disability will last 90 days or less; see Short-Term Incapacity in this item.

Step Two: Defining the Disability

For verified disabilities over 90 days, see BAM 815, Medical Determination and Disability Determination Service, for the policy requirements in obtaining a medical certification from DDS. If the client does not provide the requested verifications, the FIP should be placed into closure for failure to provide needed documentation.

For verified disabilities over 90 days, the client must apply for benefits through the Social Security Administration (SSA) before step three. See BAM 815, Medical Determination and Disability Determination Service and BEM 270, Pursuit of Benefits.

In Bridges, the Deferral/Participation Reason is *Establishing Incapacity* while awaiting the DDS decision.

Step Three: Referral to DDS

Send the completed required forms along with any medical evidence provided, to the DDS to begin the medical development process.

The Deferral/Participation Reason in Bridges remains *Establishing Incapacity*.

Manually set a reminder in Bridges for a three-month follow-up.

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DDS DECISION

Upon the receipt of the DDS decision, review the determination and information provided by DDS. Establish the accommodations the recipient needs to participate in PATH or to complete self-sufficiency-related activities. Follow the procedure for accommodating disabilities; see Reasonable Accommodation in this item.

Work Ready

Recipients determined by DDS to be work ready are able to fully engage in PATH without any accommodation. To engage the recipient in PATH, end the Disability Details record in Bridges. On the CASH-EDG Summary, the Deferral/Participation Reason will be *MWA Activity* or PATH and Bridges will generate a referral to PATH as well as the DHS-4785.

Work Ready with Limitations

Recipients determined as work ready with limitations are required to participate in PATH as defined by DDS. To engage the recipient in PATH, take the following actions:

- End the Disability Details record in Bridges.
- Update the Disability Determination-MRT and Employment Services- Details screens in Bridges to indicate the recipient is work ready with limitations.
- On the Employment Services- Detail screen, use the Other MWA Referral Comments to identify the recipient's limitations as defined by DDS.
- On the CASH-EDG Summary the Deferral/Participation Reason will be Work Ready with Limitations.
- Bridges will generate a referral to PATH as well as the DHS-4785 once the specialist runs and certifies eligibility.

Do not require the recipient to apply for RSDI/SSI.

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Work Ready with Limitations served by MDHHS

MDHHS must serve recipients, who are determined work ready with limitations by DDS, when the recipient cannot be served by PATH. These recipients are considered mandatory participants and must engage in activities monitored by the department. The specialist is responsible for assigning self-sufficiency activities up to the medically permissible limit of the recipient.

Note: When PATH states they are no longer able to serve the work ready with limitations recipient based on verification of new or increased medical condition, MDHHS may determine that the department will best serve the recipient. Document in Bridges case notes the outcome of the discussion between PATH case worker and the MDHHS specialist regarding the requirement for the recipient to be served by the department.

Ask the one-stop service center to provide any test results or other documentation about the client's limitations at the time the client is referred to MDHHS.

For the participation requirement to transfer from PATH to MDHHS, update the Employment Service- Details screen, Employment Participation Special Circumstances to Work Ready with Limitations at DHS. The CASH-EDG Summary will have a Deferral/Participation Reason of Work Ready with Limitations at DHS.

Disabled-Potentially Eligible for RSDI/SSI

After DDS determines a recipient meets the established disability criteria, verify the following:

- Update the Disability Determination- MRT and Employment Services screen to indicate the recipient is *Incapacitated* Greater than 90 Days.
- The CASH-EDG Summary will show the Deferral/Participation Reason of *Incapacitated more than 90 days*.

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When to Request a New DDS Decision

After a DDS decision and/or SSA medical determination has been denied and the client states their existing condition has worsened or states they have a new condition resulting in disability greater than 90 days, verify the new information using a DHS-54-A or a DHS-54E. When an individual presents a doctor's note after the DDS decision but does not have new medical evidence or a new condition, send the DHS-518, Assessment for FIP Participation, to the doctor and request supporting medical evidence.

If the returned verification confirms the above, follow policy in BAM 815 to make a new referral to DDS.

The specialist must assign and maintain FSSP activities to ensure continued pursuit of self-sufficiency.

If new medical evidence is not provided, do not send the case back to the DDS. The previous DDS decision stands.

NONCOMPLIANCE

When a client determined by DDS to be work ready with limitations becomes noncompliant with PATH or his/her FSSP assigned activities, follow instructions outlined in BEM 233A.

Voluntary Participants

Clients who meet the criteria for a deferral may request a referral to PATH. Deferred clients should be encouraged to participate. If the client is volunteering for PATH, generate a PATH referral and the DHS-4785 by indicating on Employment Services Detail screen in Bridges the client is requesting voluntary participation with PATH.

Noncompliance penalties apply to all voluntary participants when the client is noncompliant with activities agreed to on the FSSP or assigned by PATH. Explain to clients who volunteer that if they try to participate and discover they do not have the capacity to fulfill

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their requirements, they must immediately inform the specialist or PATH worker before becoming noncompliant.

Note: Clients identified as volunteers are eligible to volunteer only if the original deferral lasts. When the deferral time limit associated with the voluntary code expires, the specialist should make a new determination based on current case circumstances and update Bridges to reflect the change.

PERSONS NOT REQUIRED TO PARTICIPATE IN EMPLOYMENT SERVICES

Work Eligible Individual (WEI)

Aged 65 or Older

Recipients age 65 and over are not required to participate in employment related activities except for completion of the FAST and FSSP. However, they continue to count in Michigan's Work Participation Rate and may be referred to PATH as volunteers.

Non-WEI

Non-WEIs are FIP clients who do not count in the state's work participation rate. Non-WEIs do not have required hours. Non-WEIs are not required to participate in work related activities for a minimum number of hours but must complete a FAST and FSSP. Instead, non-WEIs should engage in other activities to strengthen the family or improve self-sufficiency skills. Non-WEIs include the following:

Disqualified Non-Citizens

A person who is not eligible for cash assistance due to being a noncitizen is not a WEI and is not referred to employment services and is not required to engage in PATH.

Failure to complete the FAST or FSSP by the due date may result in case closure for failure to provide the department with needed information. BEM 233A and BEM 233C do not apply.

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Note: All other disqualified members, including Intentional Program Violations, are WEIs and must be referred to PATH unless temporarily deferred.

Ineligible Caretakers

Ineligible caretakers are not recipients of FIP, although the family is receiving FIP benefits for the children. They are not WEIs and are not referred to PATH. Ineligible caretakers must complete a FAST and develop a FSSP for the family to reach self-sufficiency. Failure to complete the FAST or FSSP by the due date may result in case closure for failure to provide the department with needed information. BEM 233A and BEM 233C do not apply.

Care of a Spouse or Child with Disabilities

A spouse or parent who provides care for a spouse or child with disabilities living in the home is not a WEI and is not referred to PATH if:

- The spouse/child with disabilities lives with the spouse/parent providing care.
- A doctor/physician's assistant (P.A.) verifies all the following in writing or by using a DHS-54A, Medical Needs, form or DHS-54E, Medical Needs-PATH (the DHS 54E can be completed by a N.P. or P.A.:
 - •• The spouse/child with disabilities requires a caretaker due to the extent of the disability.
 - •• The spouse/parent is needed in the home to provide care.
 - •• The spouse/parent cannot engage in an employmentrelated activity due to the extent of care required.

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REQUEST FOR TEMPORARY DEFERRAL FROM PATH

Deferral Not Granted

Do all the following when a request for deferral is not granted:

- Document the basis of the decision including any limitations or restrictions in the FSSP under the Barriers and Referrals tab.
- Inform the individual that he/she did not meet the criteria for the deferral and that he/she will be required to participate in PATH.
- Refer the client to PATH as outlined in BEM 228, providing information on any limitations to full participation using Other MWA Referral Comments on the Employment Services Detail Screen.

Advise the client of his/her right to:

- Discuss the deferral decision with a supervisor.
- File a grievance with the one-stop service center if he/she disagrees with the activities assigned at PATH.
- File a hearing regarding denial of support services such as transportation assistance, child care assistance, decrease in benefits.

Note: When a deferral is not granted, it is not a loss of benefits, termination or negative action. When a client requests a hearing based on not being granted a deferral, be sure to advise the client at the pre-hearing conference and use the DHS-3050, Hearing Summary, to inform the administrative law judge the action did not result in a loss of benefits or services. Be sure the client understands the time to file a hearing is once he/she receives a Notice of Case Action for noncompliance.

Deferral Granted

When a request for deferral is granted:

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- Enter the supporting information in Bridges.
- Determine the length of the deferral.
- Notify the client of the decision and length of deferral. Bridges nightly interface file will notify OSMIS of the deferral.
- Document the decision in the FSSP under the Barriers and Referrals tab.

A Bridges task and reminder is sent to the worker for follow-up to review the deferral ten calendar days before the end of the month before it is to expire.

TIME LIMITS

Time limits apply to Job Search/Job Readiness and Vocational Educational activities. Excused absences and holiday hours may only be applied when they occur during of participation in unpaid work activities. Enter actual hours on the FSSP as noted below. Use caution when entering any of these hours as the time limits apply even if the client does not meet participation requirements for a given month. Do not enter excused absence hours or Job Search/Job Readiness hours if the client's FSSP planned hours will not meet federal participation requirements. Hours entered that do not meet participation requirements are applied to the limits.

Job Search/Job Readiness (JS/JR)

The limit for each WEI assigned to JS/JR is a week of federally required hours times 12 weeks. No more than four consecutive weeks are allowed without a one-week break (Sunday through Saturday) in a preceding 12-month period beginning September 28, 2008 or it is not countable.

Example: Client has a 30-hour requirement and is assigned to JS/JR. The JS/JR limit for this client is 360 hours. Client is assigned to JS/JR for 30 hours each week for six consecutive weeks and completes the assignment each week and actual hours are entered on the FSSP. The 360-hour limit is now reduced to 210 hours (360-180+30). Weeks one through four are countable for the 30 hours each week; week five is not countable and the FSSP will automatically store this week under **other work activity** and not reduce the 30 hours of participation for that week; week six is countable and reduces the total allowable hours. This client cannot

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get the 150 hours added back to his/her JS/JR limit until the corresponding report months drop off 12 months in the future.

Vocational Educational Training

This activity continues to have a lifetime limit of 12 months. The limit began January 1, 1997. Clients who participated any day in a given month since the limit began will have a count of 1 applied on the FSSP. Participation in this activity exceeding the 12 month limitation is not counted in the work participation rate.

HOLIDAYS AND EXCUSED ABSENCES

Holiday hours and excused absence hours may be applied for unpaid work activities only. The FSSP will not allow entry of these hours for paid work activities. Clients in paid work receive holiday and excused hours from their employer.

Holidays

Holidays are now considered participation when a client in an unpaid work activity has previously been assigned to a planned activity and is scheduled to participate. The following holidays are allowed:

- New Year's Day.
- Martin Luther King Jr. day.
- Memorial Day.
- Fourth of July.
- Labor Day.
- Veterans Day.
- Thanksgiving.
- Day after Thanksgiving.
- Christmas Eve.
- Christmas day.

The countable holiday hours are limited to an average of eight hours per holiday.

Record the hours that a client is scheduled to participate in the activity under that activity in the FSSP when:

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- Participation is monitored by MDHHS.
- The client was scheduled to participate.
- The date is one in the list of holidays.
- The hours are required to meet the federally required minimum hours.

Excused Absences

A client's participation in an unpaid work activity may be interrupted by occasional illness or unavoidable event. A WEI's absence may be excused up to 16 hours in a month but no more than 80 hours in a 12-month period.

Record the hours that a client is scheduled to participate in the activity under that activity in the FSSP when:

- Participation is monitored by MDHHS.
- The client was scheduled to participate.
- The hours are required to meet the federally required minimum hours.

FSSP ENTRY

MDHHS must record the activities the client will participate in and the client's actual participation in activities monitored by MDHHS directly in the FSSP. Activities may address barriers to employment services or core activities that count in the work participation rate.

PATH case managers record and monitor the activities the client will participate in and the client's actual participation in activities in OSMIS. The records in OSMIS are displayed on the FSSP the next day.

Michigan's work participation is based on the recipient's participation in required activities as captured from the records displayed in the FSSP.

VERIFICATION REQUIREMENTS

Paid Work Activities

The client's actual hours of participation in paid work activities must be verified. The specialist may use two consecutive paycheck stubs or wage statements that reflect the average number of hours worked by the client. Paycheck stubs or a collateral contact with the client's manager or supervisor meet the requirement to project the

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client's hours for six months. Determine the average number of hours worked per week and document the actual hours on the FSSP.

Example: Amber submits three consecutive paycheck stubs for pay dates of January 5, 12 and 19. One paycheck stub shows 25 hours worked, one paycheck stub shows 30 hours worked and one pay check stub shows 32 hours worked. The average of the three paycheck stubs is 29 hours per week on average.

Example: Jordan submits two consecutive paycheck stubs for pay dates of January 5 and January 19. The client is paid bi-weekly. One paycheck stub states 60 hours worked and one paycheck stub states 55 hours worked. The average of the two paycheck stubs is 28 hours per week, dropping the fraction (60+55 divided by four weeks) to obtain the weekly average.

Project hours for the next six months by using the week begin date and the weekend date on the FSSP on the Activity screen. The FSSP will not allow entries greater than six months. Set the target date to allow collection of new verification in time to project the next six-month projection.

The specialist must monitor clients working 40 hours per week at or above state minimum wage who are not participating in PATH and deferred volunteers who may be working.

Change in hours of Work Activity

When a client reports a change in the number of hours of employment during the six-month projection, the specialist must gather actual paycheck stubs that reflect the change. Change the actual hours previously recorded in the FSSP to the actual participation as verified. Use a minimum of two new consecutive paycheck stubs, wage statements or the collateral contact to project the new sixmonth period that begins the month after the month with the change.

Non-Paid Activities

Activities assigned to a MDHHS-served client on the FSSP must be verified using a DHS-630, Weekly Activity Log, when monitoring is required. Report weeks are always Sunday through Saturday. The activity log due date is always the Friday after the weekend date. Use the target date on the FSSP Activity screen as a follow-up date for receipt of the activity log. Run the Target Date report available

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through the FSSP Main Menu and follow-up accordingly with clients who must return a DHS-630, Activity Log. Enter actual hours of participation at least monthly for each client with assigned activities.

This client is advised of this requirement on the DHS-1538, Work and Self-Sufficiency Rules, at application.

If the client does not return the activity log by the due date, it is treated as a noncompliance; see BEM 233A, Failure to Meet Employment Related Requirements.

Validity of activity logs should be monitored, and best practice is to check one entry for each client once per month.

Deferrals

See Verification Sources in this item for more information.

Verify the following reasons for deferral:

- Temporary Incapacity. Obtain medical evidence if the client claims a disabling condition expected to last 90 days or less. If needed, authorize a general medical exam or payment for a medical report; see BAM 815.
- Disability. If the client claims a disabling condition expected to last more than 90 days, it must be verified by one of the following:
 - Note from client's doctor.
 - •• DHS-49.
 - •• DHS-54A.
 - DHS-54E (the DHS 54E can be completed by a P.A. or N.P.)
- Problem Pregnancy. If the client claims an inability to participate in PATH based on pregnancy complications, it must be verified by one of the following:
 - Note from client's doctor.
 - •• DHS-49.
 - •• DHS-54A.
 - •• DHS-54E (the DHS 54E can be completed by a P.A. or N.P.).
- Care of a Spouse/Child with Disabilities. A doctor/ physician's assistant must verify all of the following in writing

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using a DHS-54A, Medical Needs or DHS-54E Medical Needs-PATH, form:

- •• The disability of the spouse/child needing care and the extent and duration of the disability.
- The spouse/parent is needed in the home to provide care.
- •• The spouse/parent cannot engage in an employmentrelated activity due to the extent of care required.
- Lack of Child Care. Documentation that child care is not attainable from the Great Start Regional Child Care Resource Center serving their county.
- Domestic Violence. Document the case file with a written statement. Use other sources of verification listed in this item if questionable.

Verify other deferral reasons as needed.

VERIFICATION SOURCES

Paid Work Activities

The specialist requires verification of hours in a wage earning activity when the client does not participate in PATH. Use one of the following:

- Two consecutive paycheck stubs that reflect hours worked.
- Collateral contact with the client's manager, supervisor, or authorized representative of the employer who is able to verify the hours worked.
- Semi-annual simplified reporting verification.
- Equifax Verification Services (formerly known as the TALX Work Number).

Non-Paid Activities

Use the DHS-630, Activity Log, to collect verification of non-paid activities as noted above.

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Age and School Attendance

See BEM 240, Age, and BEM 245, School Attendance and Student Status.

SSI/RSDI Based on Disability/ Blindness

To verify information regarding SSI or RSDI based on disability or blindness, use one of the following:

- Document from the Social Security Administration.
- DHS-1552, Verification of Application or Appeal for SSI/RSDI.
- Third Party Single Online Query (SOLQ) ED-030.
- Consolidated Inquiry.

Lack of Child Care

Correspondence or telephone contact with the Great Start to Quality Resource Center confirming the client's inability to secure child care that meets the deferral criteria.

Domestic Violence

See Deferral for Domestic Violence in this item.

Temporary Incapacity

Statement from an M.D./D.O./P.A./N.P. that the person is unable to work, including diagnosis, limitations on activities and expected duration.

The DHS-54A, Medical Needs, or the DHS 54E Medical Needs (the DHS 54E can be completed by a P.A. or N.P.) - PATH; DHS-49, Medical Examination Report; or other written statement is acceptable.

For SSI/RSDI application or denial due to duration, use one of the sources listed above for Care of a Spouse/Child with a Disability.

LEGAL BASE

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MCL 400.57

Rehabilitation Act of 1973 (Section 504),

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Americans with Disabilities Act of 1990 Michigan Persons with Disabilities Civil Rights Act 1976 PA 220, MCL 37.1101-.1607

BRIDGES ELIGIBILITY MANUAL

STATE OF MICHIGAN