
GST MICHIGAN WORKS! POLICY 15-11 Change 6

TO: GST Michigan Works! Service Providers and Agency Staff

FROM: Jody Kerbyson, CEO

SUBJECT: Partnership. Accountability. Training. Hope. (PATH) and Food Assistance Employment & Training (FAE&T) Supportive Services

EFFECTIVE: August 18, 2021

PROGRAMS: PATH and FAE&T Programs

RESCISSIONS: GST Michigan Works! PI 15-11 Change 5

BACKGROUND: Supportive services may be provided to eligible AEP, PATH and FAE&T participants who are enrolled in AEP, PATH or FAE&T programs. A participant is defined as enrolled if he/she appears on the Management Information System (MIS) and is actively participating in the AEP, PATH or FAE&T program.

Supportive services may be provided when necessary to eliminate employment/training barriers. Alternative resources must be explored prior to supportive service authorization. Supportive services needs should be identified during the intake/assessment/case management process. PATH supportive services authorized by service providers of GST Michigan Works will be paid according to this policy unless there are specific requirements by another program that may conflict with this policy.

The Service Providers are charged with managing payments of supportive services and are responsible for ensuring that the provision of supportive services is appropriate, with proper documentation on file

POLICY: This policy issuance increases the limit for tool purchases. Revised language for documentation is in the Automobile Repairs section. Mileage Rate was updated as well. AEP timeframe was changed from 21 days to 10 days. Required documentation was updated to include the RD 108 or title for a car purchase. Language was added under Other Support Services to allow purchase of a computer/laptop for training or employment.

10-DAY APPLICATION ELIGIBILITY PERIOD (AEP)

FIP applicants are required to successfully complete a 10-Day AEP at an MWA, as a condition of eligibility for FIP benefits. In accordance with the PATH Program Manual, Service Providers are required to provide employment-related services, training and supportive services for all FIP applicants and recipients. The AEP participants are FIP applicants, therefore supportive services provided during the AEP are allowable cost expenditures. Supportive services are to be entered in the One-Stop Management Information System (OSMIS). Upon successful completion of the 10-Day AEP, and approval from DHS, applicants continue with PATH participation.

FOOD ASSISTANCE EMPLOYMENT & TRAINING (FAE&T) PARTICIPANT

Supportive Services are services designed to assist participants in overcoming barriers that prevent them from engaging in E&T activities. Supportive services are an integral and required element of the FAE&T program. They must be reasonable and necessary, and directly related to participation in activities, not for supporting participants' involvement in unsubsidized employment. *A participant may receive a maximum of \$960 per year.*

Supportive services may include:

- Cellular phone service (limited to three months and no other source of free data or phone service is available or appropriate for the situation).
- Clothing (appropriate for job search activity or interviews).
- Course registration fee (may qualify as a program delivery expense).
- Drug tests (required for employment).
- Fingerprinting (required for employment).
- Legal services (expunging a criminal record to secure employment).
- Medical services (i.e., TB test or physical required for employment).
- Fees (i.e., union dues, test fees, licensing and bonding fees, background checks needed for training or to support job search).
- Personal Grooming Supplies/Services (i.e., personal hygiene products and services, including haircuts, to meet program or potential employer appearance standards).
- State of Michigan identification card, temporary driving instruction permit, driving skills test, and driver's license.
- Student activity fee (if required to participate in class, may qualify as a program delivery expense).
- Training materials, textbooks, and supplies.

- Transportation (i.e., bus pass, gasoline cards, mileage reimbursement, taxi [including Uber and Lyft-type services] and necessary non-maintenance vehicle repairs [limited to \$350]).
- Work and training tools (i.e., equipment, tools, safety clothing, and uniforms necessary to complete E&T training).

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 E&T 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.
- Bad debt.
- Drug/alcohol counseling or therapy.
- Food staples and groceries.
- Living stipend.
- Mental health treatment.
- Personal computers.
- Relocation expenses.
- Student loans, fees, penalties, or fines.
- Expenditures to support employment that was obtained prior to enrollment in FAE&T.

PATH PARTICIPANT

Supportive services are to be provided as appropriate while the Family Independence Program (FIP) case is open and through the first 180-days of a participant's unsubsidized employment (the 180-day job retention period). Service Providers shall respond in a timely manner when supportive services are requested. Please note that this policy also applies to individuals whose FIP case closes prior to the end of the 180-day retention period. PATH participants receiving FIP payments beyond the 180-day retention period may be provided supportive services at the MWA's discretion and funding availability.

Requests may be an emergency, meaning that without immediate action (i.e., within 24 hours) on the part of the MWA, the participant would lose their current employment. In emergency situations, Service Providers are to respond within 24 hours in order to prevent the loss of employment.

The Service Providers and the Department of Human Services (MDHHS) are to locally coordinate supportive service payments to ensure that expenditure limitations are not exceeded. Supportive services in categories with monetary limits are to be recorded on the One-Stop Management Information System (OSMIS).

The OSMIS will provide a warning when a supportive service category reaches the participant's yearly or lifetime limit. All supportive services are required to be entered into the OSMIS. Service Providers are **not to utilize funds to pay any fines or penalties**, such as those associated with a driver's license reinstatement. Also, **funding may not be utilized to pay any fees associated with enrolling a child in daycare.**

TRANSPORTATION ALLOWANCES

Allowances for public transportation or private automobile mileage reimbursement may be provided for all allowable activities under PATH.

Transportation allowances include traveling to and from the participant's home to a job interview, job site, potential job site, childcare provider, education or training facility, community service site, work experience site, or MWA/service provider.

In a two-parent family, each parent is eligible to receive a transportation allowance if each parent is contributing towards meeting the case's work participation requirement and has the need for separate transportation.

Volunteer drivers may be reimbursed at the same rate that MDHHS volunteer drivers are reimbursed. The Service Providers should use the current MDHHS rate as a guide. Reimbursement for volunteer mileage may not exceed the MDHHS's maximum allowable rate.

Private Mileage Reimbursement

Private transportation reimbursement will be paid at the Federal IRS standard mileage rate for business (currently .56 cents/mile). Reimbursement payments made directly to a participant cannot exceed \$200.00 per week. Mileage reimbursement must be submitted at least biweekly by the participant. Reimbursement will not be given for mileage costs incurred more than 30 days prior to submittal date.

Public Transportation

Bus Passes/Uber/Lyft - PATH participants can utilize the MTA, SATA, Thumb Body Express, GLTA, Sanilac transportation and Thumb Transit bus system during PATH training/work activities. Based on grant funding, with site supervisor approval, Taxi, Uber and Lyft services may be utilized when all other options have been exhausted.

Required Documentation

Each participant must provide the following information prior to receiving mileage reimbursement:

1. Participant mileage reimbursement form, and/or
2. Employment verification form, training plan/program agreements, copies of check stubs/timesheets, or attendance verification form.

NOTE: Supportive Services must be discontinued immediately if a participant voluntarily quits a job or is fired due to negative actions on the part of participant.

EMERGENCY SITUATIONS

Requests may be an emergency, meaning that without immediate action (i.e., within 24 hours) on the part of the MWA, the participant would lose their current employment or be in a distressed situation. Service providers are to respond within 24 hours to prevent the loss of employment. Bus passes and emergency gas cards may be given in emergency settings to individuals who are active participants. Should extenuating circumstances occur to warrant gas card distribution, case notes will be updated appropriately to reflect the need.

Required Documentation

1. An accurate record of gas cards numbered, with names and dates assigned will be maintained by the service providers. Participant signature required verifying receipt of gas card.
2. Case Notes in OSMIS updated to document the need and nature of the emergency.

AUTOMOBILE PURCHASE (\$4,000/lifetime)

Up to \$4,000 may be authorized toward the purchase of an automobile if it will be used as the participant's primary means of transportation for employment-related activities. In a two-parent family, if both parents are required to participate and need separate vehicles, an exception may be made prior to approving a vehicle purchase for a second parent. Payment may be authorized for a licensed mechanic's inspection in addition to the \$4000 automobile purchase authorization. Automobile purchase is limited to once in a client's lifetime. The vehicle purchase must be approved in advance.

Required Documentation

GST will ensure all the following before authorizing any vehicle purchase.

1. Public transportation is not reasonably available (consideration for location, hours of employment, childcare, or long commutes may factor in) and the person has no other means to reach the job site reliably.
2. RD 108 or title
3. The customer can afford the expenses associated with owning the vehicle.
4. The customer has a valid Michigan driver's license.
5. Verify via the Secretary of State records that the client does not own a vehicle.
6. The customer must be active in employment related activities.

7. The cost of the vehicle must not exceed the vehicle's retail value.
8. A licensed mechanic must verify the vehicle is safe and roadworthy.
9. All documentation must be maintained in the participant file.

To prevent a misappropriation of funds, the automobile must be registered and insured (at a minimum with personal liability and property damage insurance) in the name of a member of the eligible family. For purposes of this policy, a member of the eligible family is defined as any adult who is included in the FIP grant. Furthermore, automobiles cannot be purchased from participant's immediate family members. (Father, mother, brother, sister, son or daughter)

GST Michigan Works and Service Provider employees are prohibited from selling vehicles to participants that will be purchased using supportive services funds.

AUTOMOBILE REPAIRS (\$900/12-month time period)

Automobile repairs may be authorized up to \$900 per participant in any 12-month period. The vehicle must be his/her primary means of transportation for employment-related activities. The total MDHH's/PATH program cost of repairs may not exceed \$900.00, including any repairs done in the previous 12 months. Clients may contribute any amount over the \$900.00 prior to payment. In a two-parent family, each parent who is contributing towards meeting the case's work participation requirement may be eligible to receive up to \$900 toward the repair of an automobile. However, the funding must be directed towards separate automobiles for each parent, and the automobiles are used as the primary means of transportation for employment-related activities. The cost of the repairs must not exceed the vehicle's retail value.

Do not authorize any vehicle repair for a vehicle that has been purchased within the last 60 calendar days.

Required Documentation

The following documentation is required from the participant prior to authorization and approval of car repairs:

1. Copy of vehicle title or current vehicle registration.
2. An estimate of the vehicle repair from a certified mechanic must be placed in the case file, and
3. Receipt required.
4. Ensure that the vehicle was not purchased within the last 60 calendar days by us.

All documentation must be current to be considered valid; no expired documents may be accepted. All repairs are expected to make the vehicle safe and roadworthy. To prevent a misappropriation of funds, the automobile must be registered or insured in the name of a member of the eligible family. For purposes of this policy, a member of the eligible family is defined as any adult who is included in the FIP grant. Payment may be authorized for a licensed mechanic's repair estimate in addition to the \$900 automobile repair authorization.

VEHICLE INSURANCE

Vehicle insurance is limited to a \$2,000 maximum lifetime cap. Vehicle insurance is limited to the time period in which the client is establishing income to allow for their ongoing payment of the insurance, up to 90 days at one time.

Required Documentation

The following documentation is required from the participant prior to authorization and approval of car insurance.

1. Copy of vehicle title or vehicle registration.
2. An estimate of insurance coverage must be placed in the case file, and
3. Receipt required.

CLOTHING (\$500.00/12-month limit)

A maximum of \$500 in clothing supportive services may be provided to participants per 12-month period to aid in meeting work participation activity requirements. Allowable items include clothing for interviews, work gloves, work boots, work shoes, hard hats, personal safety items, protective/special clothing, uniforms, and other clothing as needed to participate in training and/or clothing that is job appropriate.

In a two-parent family, each parent who is contributing towards meeting the case's work participation requirement is eligible.

PATH participants may be provided with clothing allowances once they have attended Orientation, through their employment retention period.

Required Documentation

The following documentation is required from the participant prior to authorization:

1. PATH verification form (signed by participant, provider and/or employer),
2. Case note describing need/justification for clothing, and
3. Receipt required.

RELOCATION EXPENSES (\$1,500/per move)

A moving expense allowance for participants who have obtained verified employment at a location outside commuting distance (50 miles) from their home may be provided. Allowable moving expenses, and specific requirements for each expense, are as follows:

1. A letter verifying employment must be obtained from the employer.
2. Pre-location expenses may be paid (coordination of details of the move beforehand, as well as, the actual moving plan). Receipts must be provided.
3. Trailer or truck rental requirements and provisions:

- a. A professional moving company must be used, and
- b. One documented quote should be obtained from moving company.
- 4. Rental of moving equipment, such as dollies.
- 5. Mileage costs to drive to the new residence may be reimbursed at .15 per mile.
- 6. Reimbursement for lodging/food (one meal) may be provided.
- 7. Receipts must be submitted for all expenses. Only costs deemed to be reasonable will be reimbursed.
- 8. Assistance with phone hook-up may be provided. However, **NO** outstanding debts may be paid.
- 9. The security deposit and first month's rent may be covered.
- 10. Total reimbursements for moving expenses may not exceed \$1,500.00.

In addition, moving expenses are available once during a participant's FIP eligibility period. In two parent families, both parents are eligible if they both obtain employment that requires relocation.

Required Documentation

- 1. A letter verifying employment must be obtained from the employer.
- 2. An estimate of the relocation cost must be placed in the case file, and
- 3. Receipts required.

TOOLS/JOB SPECIFIC SUPPLIES (\$2000.00)

Service providers may pay for tools/job specific supplies determined necessary to perform specific work/training activities. The \$2000.00 limit can only be used once in a lifetime.

Required Documentation

- 1. Case notes in OSMIS updated to document the need for tools/job specific items as related to a training related activity or employment once confirmed.
- 2. Letter stating required tools (on employer/institution letterhead);
- 3. An estimate indicating tool cost and store contact information must be placed in the case file; and
- 4. Receipt required.

OTHER EMPLOYMENT SUPPORT SERVICES

At the discretion of the Service Provider, other one time, noncontinuing, work-related expenses may be purchased to enable individuals to participate in activities or seek, obtain and retain employment when funds are not available from other sources. A computer/laptop up to \$500.00 may be purchased for a participant as necessary for training or employment.

Professional License Fees	Driver's Licenses	Certification Testing
Vehicle Registration/ Plates	Business Start Up Expenses	Computer/Laptop \$500.00 Limit

MEDICAL EXAMS, IMMUNIZATIONS AND TESTS

Certain services which are not defined as medical services by the MDHHS, may be needed to overcome barriers to employment or training, and are allowable supportive service expenses

Employment-related Photocopies	Completion of a Medical Needs Form by a Doctor	Physical examination for employment
Immunizations for Employment/ training	Medical tests for employment/training	Drug Screening

The PATH support services may be used for dental services that **are not covered** under Medicaid, another health insurance plan or by a community public health agency that normally covers medical and /or dental services for the diagnosis, prevention, and treatment of physical or mental diseases. To access information about the types of dental services that are covered under Medicaid, the MWAs may either contact a local Medicaid provider or email Mr. Kyle Norman, Medicaid Dental Policy Specialist, Michigan Department of Health and Human Services at Normank2@michigan.gov . Requests for these services must be submitted for approval to a supervisor along with an estimate and documentation the service is not covered. Dental Services shall not exceed \$3000.00.

EXCLUSIONS

GST Michigan Works! Funds cannot be used for debts, loans, fines, penalties, parking tickets, or moving/vehicle violation fines. Funding may not be used to pay fees associated with enrolling a child in day care.

VOUCHERS & VENDOR CHECKS

All vouchers issued to participants must have the participant's name and vendor's name appearing on vouchers. This requires the signature of the participant and presentation of ID when voucher is redeemed. Participant's name and vendor's name are to appear on all vendor checks issued to participants. This requires the signature of the participant and presentation of ID when services are being rendered.

REIMBURSEMENT

All Supportive Services vouchers will be closed out at the end of each month. If a Service Provider wants reimbursement for costs incurred for Supportive Services, the Service Provider must submit to GST Michigan Works! the monthly Supportive Services Participant Billing Form. The participant must be on the OSMIS to receive reimbursement. Service Providers will be held responsible for payment of all vouchers not closed out at the end of the month. Exceptions to this requirement must receive prior MWA approval. The Service Provider must maintain all procurement forms, copies of invoices, and supportive services documentation.

DISCLAIMER

GST Michigan Works! realizes that situations may occur that will require assistance not covered in the above-mentioned categories. These requests will be reviewed on an individual basis following the PATH manual. GST Michigan Works! reserves the right to discontinue services if fraudulent claims for payments are submitted, or if other abuses of Supportive Services are detected. GST Michigan Works! has the discretion to deny any Supportive Services request where prior approval, if required, was not obtained.

ACTION:

Service Providers shall take the appropriate actions necessary to implement the directives of this policy issuance. Service Provider officials shall ensure the information contained in this policy is disseminated to all appropriate staff.

INQUIRIES:

Questions regarding this policy issuance should be directed to Mary Lorah-Hammond at (810) 233-5974, Ext 121 or JulAnn Kuenzli 989-635-3561 Ext 230.

SIGNED:



Jody Kerbyson, CEO

8/18/21

Date