



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY  
LANSING

JEFF DONOFRIO  
DIRECTOR

**OFFICIAL  
Policy Issuance (PI): 19-26**

**Date:** October 2, 2019

**To:** Michigan Works! Agency (MWA) Directors

**From:** Joe Billig, Division Administrator **SIGNED**  
Targeted Services  
Workforce Development

**Subject:** Food Assistance Employment and Training (FAE&T) Plus Program Plan  
Instructions for Fiscal Year (FY) 2020.

**Programs  
Affected:** FAE&T

**Rescissions:** None

**References:** Food and Nutrition Act (the Act) of 2008, 7 United States Code (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§ 2011 (2008) (originally enacted as Food Stamp Act of 1977, as amended,  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

Food and Nutrition Act of 2008, as amended by the Agriculture Improvement  
Act of 2018, PL 115-334, (2018)

7 Code of Federal Regulations, Department of Agriculture, Parts 273.75  
and 277

PI 19-01, Michigan Works! System Plan Instructions for Calendar Year 2019,  
issued February 5, 2019, and subsequent changes

PI 15-12, Procurement issued July 17, 2015

**Background:** The Food and Nutrition Act provides that state agencies be given maximum  
flexibility in designing Employment & Training (E&T) programs for individuals  
receiving Food Assistance. An E&T program is a package of services, which  
includes assessment, component activities, participant reimbursements, and  
follow-up. The United States Department of Agriculture, Food & Nutrition

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Service (FNS) provides states with 50 percent reimbursement funds to support and expand robust E&T programs funded with non-federal dollars.

The Michigan Department of Health and Human Services (MDHHS) and the Michigan Department of Labor and Economic Opportunity–Workforce Development (LEO-WD) are committed to expanding job-driven E&T services to all Food Assistance Program (FAP) recipients by operating a voluntary FAE&T Plus program. The FAE&T Plus program connects with third-party partners also known as Plus Contractors, that focus on employer demand while offering skills training and credentials required to obtain self-sustaining employment.

**Policy:**

This policy is in effect for Detroit Employment Solutions Corporation (DESC) and West Michigan Works! to subcontract with multiple entities to deliver the FAE&T Plus program. The program provides FAP recipients, between the ages of 18 and 59, the opportunity to increase skills and abilities necessary to obtain self-sustaining employment. Participants must not be receiving cash benefits from the MDHHS, and they must be able to work upon program completion.

**Allocations**

Plus Program Delivery and Supportive Services must be paid for with the Plus Contractors' non-federal funding. The State of Michigan will work in conjunction with the Plus Contractor and the MWA to request 50 percent reimbursement from the FNS via the Management of Award to Recipients System (MARS). The MWA will receive a reimbursement amount equal to 10 percent of approved Plus Contractor expenditures, and the Plus Contractor will receive a 40 percent reimbursement. For FY 2020, DESC is an approved Plus Contractor providing intermediary services for the Plus Contractors in their service delivery area. Attachment A represents the funding designated for each MWA. The allocation for DESC includes \$24,259 that is reimbursable to DESC in their role as a Plus Contractor.

**Plus Contractor Budget Variances**

The funding for the allocations were derived from the approved FAE&T Plus budgets for each Plus Contractor. It is common for the Plus Contractor to require a modification to their initial budget during the FY. The MWA must notify WD, in writing, if such changes create a 10 percent variance in the MWA's overall Program Delivery or Supportive Services allocation.

**Use of Funds**

There is no carry-in of unexpended FY 2019 FAE&T Plus funds. There will be no carry-forward of any unexpended FY 2020 FAE&T Plus funds into FY 2021. The FAE&T Plus funds may only be used on a reimbursement basis after the MWA receives and approves the Plus Contractors' monthly invoices. The required invoice process is detailed later in this policy.

## Coordination of Services

A participant may receive services from the MWA and a Plus Contractor or multiple Plus Contractors at the same time. It is the MWA's responsibility to coordinate services for co-enrolled participants to prevent duplications of services provided. Duplication of service means the participant engages in the same activity or receives the same supportive service from multiple Plus Contractors even if the activity is different. Duplicate services are not eligible for reimbursement.

## Program Delivery

In addition to program delivery costs for approved activities, program funds may be used for actual educational costs if the MWA verifies and documents no other source of financial assistance is available to the participant. With the exception of student loans, participants must attempt to secure federal financial aid (e.g., a Pell Grant) if applicable, for the educational institution/activity.

The FNS does not recognize unsubsidized employment as an allowable category of service. Therefore, case management and supportive service expenditures associated with supporting the participants continued employment is part of the Job Retention Services (JRS) activity. The Plus Contractor must have an approved JRS activity to qualify for reimbursement.

Work based learning, including On-the-Job Training, apprenticeships, paid internships, and transitional jobs, is not considered employment and the participants are not eligible for JRS.

## Supportive Services

Supportive Services are services designed to assist participants in overcoming barriers that prevent them from engaging in E&T activities. They must be reasonable and necessary, and directly related to participation in activities, ***not for supporting participants' involvement in unsubsidized employment.***

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 (e.g., TB test vision exam, eyeglasses, dental care or physical required for employment).

- Fees (e.g., union dues, test fees, licensing and bonding fees, background checks needed for training, or to support job search).
- Personal Grooming Supplies/Services (e.g., 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.
- Activity fee (if required to participate; may qualify as a program delivery expense).
- Training materials, textbooks, and supplies.
- Transportation (e.g., bus pass, gasoline cards, mileage reimbursement, taxi [including Uber and Lyft-type services] and necessary non-maintenance vehicle repairs).
- Work and training tools (e.g., equipment, tools, safety clothing, and uniforms necessary to complete E&T training).
- Housing assistance (limited to two months for rent & utilities only).

### **Job Retention Supportive Services**

Job retention supportive services are designed to assist the participant in maintaining employment and can only be provided when a participant is enrolled in the JRS activity. The following job retention supportive services are permissible if they are required to maintain the employment:

- Clothing.
- Fees (e.g., union dues, test fees, licensing and bonding fees).
- Personal Grooming Supplies/Services (e.g., personal hygiene products and services, including haircuts, to meet employer appearance standards).
- Transportation (e.g., bus pass, gasoline cards, mileage reimbursement, taxi [including Uber and Lyft-type services] and necessary non-maintenance vehicle repairs).
- Work tools (e.g., equipment, tools, safety clothing, uniforms).

The Plus Contractors may provide supportive services in the form of a prepaid allowance 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.

If gift cards or vouchers are provided, **as a prepaid allowance**, their use must be restricted to specific purchases or services allowed by the program **or** a receipt is required from the participant. For mileage reimbursement, the

completed activity log where mileage was required satisfies the receipt requirement. In addition, case file documentation must clearly identify the supportive service provided.

The following items **do not** qualify for reimbursement:

- 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.
- Any expenditure to support employment that was obtained prior to enrollment in FAE&T Plus.

### **Plan Instructions**

- **Approval Request** – which bears the signatures of authorized Chief Elected Official(s) and the Workforce Development Board chairperson.
- **Narrative** – which describes the planned program activities and supportive services to be provided **by each organization**, as described in the plan narrative instructions.
- **Budget Information Summary (BIS)** – which includes one BIS for Program Delivery and one BIS for Supportive Services. Separate Grant Action Notices will be issued for each funding source.

### **Fiscal Information**

#### ***Documentation Required from the Plus Contractor***

For each reimbursement request, the MWA is required to have the Plus Contractor submit the official forms listed below, and follow the instructions included in the FAE&T Plus Program Guidelines PI 18-35 or replacement policy.

- FAET-200, Plus Invoice and Non-Federal Funds Certification.
- One-Stop Management Information System (OSMIS) Report, FAE&T Plus Participants for Invoice.
- OSMIS Report, FAE&T Plus Supportive Services for Invoice.

**\*\*Note:** All participants must have been eligible for FAE&T Plus at the time the cost was incurred for the Plus Contractor to qualify for reimbursement. If

the participant is found ineligible, the Plus Contractor cannot bill for the participant.

### ***MWA Requesting Reimbursement via the MARS***

The MWA must verify and approve all requests for reimbursement prior to recording the expenditures in the MARS. A completed FAET-300 Approved Non-Federal Expenditures form must remain with the invoice documentation to support each MARS draw and is subject to review by WD.

When generating a MARS Expenditure Report, the MWA should:

- Select the FY20 FAE&T PLUS PROGRAM grant.
  - Enter the **total amount** from the “Program Expenditures” column on the FAET-300 form to the “Non-Federal Funds” cost category.
  - Enter the **total amount** of the Program Delivery “Federal Reimbursement” column on the FAET-300 form to the “Program Delivery” cost category (this will be the amount of the MARS Draw).
- Select the FY20 FAE&T SUPP SERVS grant.
  - Enter the **total amount** from the “Supportive Services Expenditures” column on the FAET-300 form to the “Non-Federal Funds” cost category.
  - Enter the **total amount** of the Supportive Services “Federal Reimbursement” column on the FAET-300 form to the “Supportive Services” cost category (this will be the amount of the MARS Draw).
- Note: If Community Development Block Grant (CDBG) funds are used to provide services, follow the above procedures, except record 100 percent of costs for the CDBG expenditures in the “Other Federal Funds” cost category on the MARS expenditure report.

Additional considerations:

- The MWA is only eligible to request cash for expenditures reported in either the Supportive Services or Program Delivery cost categories.
- As detailed on the FAET-300 Plus form, when reimbursement funds are received from MARS, the MWA is eligible to retain 10 percent of the “Total Program Delivery and/or Supportive Services Expenditures” reported. The balance of the disbursement is required to be distributed to the Plus Contractor(s).
- Reimbursement payments due to the Plus Contractors must occur within 60 days of the MWA receiving an invoice and all required documentation.
- The funds the Plus Contractor receives from reimbursement may be used as a non-federal revenue source for future FAE&T Plus invoices. This is known as re-utilizing funds. If the Plus Contractor chooses this option, they must provide supporting documentation on the FAET-200 Plus Invoice and Non-Federal Funds Certification form.

All Plus Contractors accepting reimbursement funds are considered subrecipients of a federal award as defined in Code of Federal Regulations (CFR) Section 200.330.

The MWA must obtain sufficient documentation to ensure the funds reported as Non-Federal Funds Expended meet the requirements of the CFR Section 200.306 including (but not limited to) the following requirements: 1) are not included as contributions for any other Federal award; 2) are necessary and reasonable for accomplishment of project or program objectives; 3) are allowable and in compliance with the State Plan; and 4) are not paid by the Federal Government under another award. If the match was found ineligible, the Plus Contractor and the MWA may not draw the matching federal funds.

**Action:**

The MWA must process all cash requests through the MARS in accordance with the MARS Manual. The MWA must retain appropriate documentation to support each cash draw. Grantees are required to report all financial transactions on a full accrual basis. Accrued expenditures are costs incurred for goods and services but not paid during the reporting period.

All reporting of fiscal expenditures of the funds provided through this policy must be reported to the WD on a quarterly basis. All quarterly financial expenditure reports are due to the WD no later than the 20th calendar day after the end of the calendar quarter. A final close-out report is also required and is due to the WD no later than 60 days after the end of the grant period. In the event that the due date falls on a weekend or state government holiday, reports are due on the last business day prior to the due date. Submit reports in **MARS**. If there are any questions regarding cash requests or submission of expenditure reports, please call Marilyn Carey at 517-241-6742.

The MWA officials receiving funding shall prepare and submit a signed Approval Request form, a Plan Narrative, and BIS forms within 30 days of the official date of this policy to [TED-TSDIV@michigan.gov](mailto:TED-TSDIV@michigan.gov) or by hardcopy to:

Michigan Department of Labor and  
Economic Opportunity  
Workforce Development  
Targeted Services Division  
Ms. Melissa Stebbins  
201 North Washington Square, 5<sup>th</sup> Floor  
Lansing, Michigan 48913

WD will not accept documents prior to the official date of the policy.

**Inquiries:**

Questions regarding this policy should be directed to your Reemployment Services State Coordinator at 517-930-5702.

This policy is available for downloading from [WD's website](#).

WD is an equal opportunity employer program. Auxiliary aids and services are available upon request to individuals with disabilities. WD is funded by State and Federal funds, more details available on the Legal Disclaimer page at [www.michigan.gov/WDA](http://www.michigan.gov/WDA). Please contact Ms. Melissa Stebbins by telephone at 517-241-9834 or by email at [stebbinsm@michigan.gov](mailto:stebbinsm@michigan.gov) for details.

**Expiration**

**Date:** September 30, 2020

JB:LM:ms  
Attachments

SUMMARY OF APPROVED NON-FEDERAL EXPENDITURES SUBMITTED FOR 50 PERCENT  
FEDERAL REIMBURSEMENT VIA MANAGEMENT OF AWARDS TO RECIPIENTS SYSTEM  
(MARS)

FAET-300 INSTRUCTIONS

The FAET-300 form is an Excel workbook the Michigan Works! Agency (MWA) completes to support each draw from the MARS for the Food Assistance Employment & Training Plus Program (FAE&T Plus).

The form calculates the Plus Contractor Expenditures, the Requested Federal Reimbursement, the amount Retained by the MWA for Administration, and the amount Reimbursed to the Plus Contractor(s) for each invoice period.

The completed FAET-300 – Plus Approved Non-Federal Expenditures form must remain with the invoice documentation to support each MARS draw and is subject to review by the State of Michigan and/or FNS.

SECTION I – IDENTIFICATION

**“Michigan Works! Agency (MWA)”**: Enter the name of the MWA.

**MWA Contact Person, Email Address, and Phone Number**: Identify a person and provide contact information for purposes of discussing the MARS draw.

**Report Period Begin Date**: Enter the first day of the period for the MARS draw.

**Report Period End Date**: Enter the last day of the period for the MARS draw.

SECTION II – PROGRAM DELIVERY

**Contractor Name(s)**: Enter the name of each Plus Contractor that submitted an invoice requesting reimbursement for Program Delivery expenditures for the report period.

**Program Delivery Expenditures**: Enter the amount of funds each Plus Contractor reported as non-federal expenditures for program delivery on their invoice for the report period.

**Federal Reimbursement**: *The cell automatically calculates 50 percent of the program delivery expenditures entered for each Plus Contractor.*

**Retained by MWA for Administration**: *The cell automatically calculates 10 percent of the program delivery expenditures entered for each Plus Contractor.*

**Reimbursed to Contractor(s)**: *The cell automatically calculates 40 percent of the program delivery expenditures entered for each Plus Contractor.*

**Total Program Expenditures & Reimbursements**: *The cells automatically calculate the sum of program expenditures and federal reimbursement retained by the MWA for administration and reimbursed to Plus contractor(s).*

### SECTION III – SUPPORTIVE SERVICES

**Contractor Name(s):** Enter the name of each Plus Contractor that submitted an invoice requesting reimbursement for supportive service expenditures for the report period. Note: This includes MWAs that are also approved Plus Contractors.

**Supportive Service Expenditures:** Enter the amount of funds each Plus Contractor reported as non-federal expenditures for supportive services on their invoice for the report period.

**Requested Reimbursement:** *The cell automatically calculates 50 percent of the supportive service expenditures entered for each Plus Contractor.*

**Retained by MWA for Administration:** *The cell automatically calculates 10 percent of the supportive service expenditures entered for each Plus Contractor.*

**Reimbursed to Contractor(s):** *The cell automatically calculates 40 percent of the supportive service expenditures entered for each Plus Contractor.*

**Total Supportive Services Expenditures & Reimbursements:** *The cells automatically calculate the sum of Plus Contractor supportive service expenditures and requested reimbursement retained by the MWA for administration and reimbursed to Plus Contractor(s).*

**Date Processed in MARS:** Enter the date the Draw was processed in MARS.

**Food Assistance Employment and Training (FAE&T) Plus Program  
Summary of Approved Non-Federal Expenditures Submitted for 50% Federal Reimbursement via MARS**

Michigan Works! Agency (MWA)				
MWA Contact				
MWA Contact Email Address				
MWA Contact Phone Number		Report Period Begin Date		Report Period End Date

Contractor Name(s)	Program Delivery Expenditures		Disbursement of Reimbursed Funds	
	Program Expenditures (paid for with non-federal funds)	Federal Reimbursement (MARS Draw Amount)	Retained by MWA for Administration (10% of Expenditures)	Reimbursed to Contractor(s) (40% of Expenditures)
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
<b>Total Program Expenditures &amp; Reimbursements</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

Contractor Name(s)	Supportive Service Expenditures (participant reimbursements)		Disbursement of Reimbursed Funds	
	Supportive Service Expenditures (paid for with non-federal funds)	Federal Reimbursement (MARS Draw Amount)	Retained by MWA for Administration (10% of Expenditures)	Reimbursed to Contractor(s) (40% of Expenditures)
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
		\$ -	\$ -	\$ -
<b>Total Supportive Service Expenditures &amp; Reimbursements</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

				Date Processed in MARS	
FAET-300 - Plus Approved Non-Federal Expenditures (Revised 10/2/2019)					
This institution is an equal opportunity provider. Auxiliary aids and services are available upon request to individuals with disabilities.					

### ***Approval Request Form Instructions***

1. Michigan Works! Agency (MWA): Enter the name of the MWA.
2. Plan Title(s): Enter the appropriate title for the plan being submitted. "Food Assistance Employment and Training Plus" has been pre-printed.
3. Policy Issuance Number: Enter the policy issuance number. "19-26" has been pre-printed.
4. Plan Period: Enter the start and end dates of the plan period. "10/01/19 through 09/30/20" has been pre-printed.

The required signatories are designated in accordance with the Michigan Department of Labor & Economic Growth/Bureau of Workforce Programs PI 07-13 issued August 29, 2007. Signatures are required from the Workforce Development Board Chair and the Chief Elected Official(s), or their authorized designee(s).

## Approval Request Form

1. Michigan Works! Agency (MWA) Name and Number:

2. Plan Title(s):

Food Assistance Employment and Training Plus

3. Policy Issuance Number:

19-26

4. Plan Period:

October 1, 2019 through September 30, 2020

The Chief Elected Official(s) and Workforce Development Board hereby request approval of this document. Please insert the printed name for each signature provided below.

Signature of Authorized Chief Elected Official

Date:

Printed Name:

Signature of Authorized Chief Elected Official

Date:

Printed Name:

Signature of Authorized Chief Elected Official

Date:

Printed Name:

Signature of Workforce Development Board Chairperson

Date:

Printed Name:

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***Food Assistance Employment and Training Plus (FAE&T Plus)  
Plan Narrative Instructions***

A. Michigan Works! Agency (MWA) Identification Information

FAE&T Plus Contact Person: Identify the MWA contact person (including telephone number and email address) for purposes of discussing the FAE&T Plus plan contents.

B. Description of Services to be Provided

The plan narrative is to provide a description of the FAE&T Plus program design. The following elements must be included for **each organization the MWA has contracted with to deliver the approved E&T activities as a Plus Contractor.**

1. A description of the recruitment process.
2. A description of the eligibility verification process.
3. A description of the orientation process.
4. A description of the participant assessment tool.
5. A description of each of the planned FAE&T Plus activities.
6. The projected total number of participants the organization plans to serve.
7. A description of the supportive services available to participants for which the Plus Contractor will request reimbursement.
8. A description of the coordination of services between the MWA and Plus Contractor, if participants will be served by both organizations.

## **Budget Information Summary (BIS) Instructions**

### ***Food Assistance Employment and Training Plus - Program Delivery***

#### SECTION I - IDENTIFICATION

**Michigan Works! Agency (MWA) Name:** Enter the name of the MWA.

**Policy Issuance Number:** Enter the policy issuance number. "19-26" has been pre-printed.

**Grant Name:** Enter the grant name. "FY20 FAE&T PLUS PROGRAM" has been pre-printed.

**Project Name:** Enter the project name. "Plus Program" has been pre-printed.

**Plan Period:** Enter the start and end dates of the plan period. "10/01/19 through 09/30/20" has been pre-printed.

**Catalog of Federal Domestic Assistance (CFDA):** Enter the CFDA number associated with the Program. "10.561" has been pre-printed.

#### SECTION II - TOTAL FUNDS AVAILABLE

**Beginning Allocation:** Enter the amount of the beginning allocation.

**Additional Allocation:** Enter the amount of the additional allocation, if applicable.

**De-obligation:** Enter the de-obligation amount, if applicable.

**Total Funds Available:** *This cell will automatically calculate the sum of Section II.*

#### SECTION III – PLANNED EXPENDITURES

**Program Delivery:** *This cell will automatically equal the total funds available.*

**Note:** The Program Delivery BIS form titled "19-26\_BIS-Program.xlsx" is attached to this policy email.

**Budget Information Summary (BIS) Instructions**  
**Food Assistance Employment and Training Plus – Supportive Services**

SECTION I – IDENTIFICATION

**Michigan Works! Agency (MWA) Name:** Enter the name of the MWA.

**Policy Issuance Number:** Enter the policy issuance number. “19-26” has been pre-printed.

**Grant Name:** Enter the grant name. “FY20 FAE&T PLUS SUPP SERVS” has been pre-printed.

**Project Name:** Enter the project name. “Plus Supp Servs” has been pre-printed.

**Plan Period:** Enter the start and end dates of the plan period. “10/01/19 through 09/30/20” has been pre-printed.

**Catalog of Federal Domestic Assistance (CFDA):** Enter the CFDA number associated with the Program. “10.561” has been pre-printed.

SECTION II – TOTAL FUNDS AVAILABLE

**Beginning Allocation:** Enter the amount of the beginning allocation.

**Additional Allocation:** Enter the additional allocation, if applicable.

**De-obligation:** Enter the de-obligation amount, if applicable.

**Total Funds Available:** *This cell will automatically calculate the sum of section II.*

SECTION III – PLANNED EXPENDITURES

**Supportive Services:** *This cell will automatically equal the total funds available.*

**Note:** The Supportive Services BIS form titled “19-26\_BIS-Supp-Servs.xlsx” is attached to this policy email.

Food Assistance Employment and Training Plus Allocation for Reimbursement  
Fiscal Year 2020, PI 19-26

<b>Michigan Works! Agency</b>	<b>Allocation for Approved Reimbursement Funds for Program Delivery</b>	<b>Allocation for Approved Reimbursement Funds for Supportive Services</b>
	(\$)	(\$)
ACSET dba West MI Works!	280,023.00	10,173.00
Detroit Employment Solutions Corporation	919,537.00	40,813.00
<b>Total</b>	<b>1,199,560.00</b>	<b>50,986.00</b>