



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY  
LANSING

JEFF DONOFRIO  
DIRECTOR

**OFFICIAL  
Policy Issuance (PI): 20-02**

**Date:** February 6, 2020

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

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

**Subject:** Partnership.Accountability.Training.Hope. (PATH) Statewide High School Completion or Equivalency (HSC/HSE) Pilot

**Programs Affected:** PATH

**Rescissions:** None

**References:** Reauthorization of the Temporary Assistance for Needy Families (TANF) Program, Final Rule, 45 Code of Federal Regulation Parts 261, 262, 263, and 265

PI 19-28, Fiscal Year 2020 PATH Plan Instructions, issued October 17, 2019, and subsequent changes

PATH Program Manual issued November 14, 2014; updated January 8, 2020

**Background:** The recent and sustained success of Michigan's PATH program has substantially reduced the liability of not meeting the federally imposed 50 percent work participation rate (WPR) and all associated penalties. Additionally, the enforcement of the 48-month lifetime limit for cash assistance has allowed for the modification of some of the goals designed into PATH. In our current environment, Michigan has the ability to expand and extend the opportunity for PATH participants to pursue high school completion, or equivalency, without facing the adverse effects of not meeting the individual federal minimum work participation requirement.

With this policy, Michigan is investing in the success of PATH participants by supporting them as they obtain the education necessary to expand their job opportunities and assume the challenges of sustaining family self-sufficiency. In addition, participants who increase their education level will be better prepared for a future economic downturn.

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The PATH program delivery will benefit by focusing on removing barriers to employment, resulting in positive outcomes and spending less time and resources on tracking the triage adjudication process associated with not meeting work requirements. In addition, by allowing and encouraging this population to work toward high school completion or equivalency, Michigan will be taking an initial step toward the Governor’s Sixty by 30 proposal of upskilling the state’s workforce and attracting employers by offering a better educated, more qualified pool of candidates.

**Policy:**

In response to the MWA’s expressed desire to improve the PATH program and its impact on the conditions of participants, The Michigan Department of Labor and Economic Development – Workforce Development (LEO-WD) is allowing a greater percentage of individuals the opportunity to increase their educational level. Effective January 1, 2020, the HSC/HSE pilot allows WD to count actual hours in high school completion or equivalency activities as core hours when determining if a PATH participant met the work participation requirement.

**Program Design**

For the purposes of this pilot, the MWA should consider participation in “*Satisfactory Attendance at a Secondary School or in a Course of Study Leading to a Certificate of General Equivalence*” as a **Core Activity**.

The activity consists of regular attendance at a secondary school, in accordance with the requirements of the secondary school, at and adult education program, in accordance with the requirements of the adult education program, or in a course of study leading to a certificate of general equivalence. The HSE certificate, also known as the HSE credential may be obtained through participation with adult education, credit recovery programs, and distance learning online courses or independent study. The goal will be to successfully complete one of the following:

- High School Diploma.
- General Educational Development (GED).
- High School Equivalency Test (HiSET).
- Testing Assessing Secondary Completion (TASC).

*The activity compliments and does not replace the Deeming for 18 & 19-Year-Olds activity as defined in the PATH Manual.*

The participant must complete the minimum required hours of participation determined for the family size without concern for meeting work participation based on the core and non-core hours requirement.

Family Type	Minimum Average Hours Required Per Week	Average Core Hours Required Per Week	Remaining Average Hours Required Per Week (Core and Non-Core)
Single parent with a child under six	20	20	None
Single parent without a child under six	30	20	10
Two parents without federally funded childcare	35	30	5
Two parents with federally funded childcare	55	50	5

The following examples describe how the work requirement can be met when treating secondary education activities as core. The activity names in the examples align with the available options in the *One Stop Management Information System (OSMIS)*. The *General Equivalency Diploma* activity includes *HiSET* and *TASC*.

**Example 1:** A *PATH* participant with a 20-hour weekly requirement has the following participation documented in the *OSMIS* for each week of the month.

5 hours = *Unsubsidized Employment* activity  
15 hours = *General Equivalency Diploma* activity  
20 hours = 5 Core hours and 15 Non-Core hours

The participant does not meet the official work participation requirement due to insufficient core hours but does meet the work participation requirement as part of the *HSC/HSE* pilot.

**Example 2:** A *PATH* participant with a 30-hour weekly requirement has the following participation documented in the *OSMIS* for each week of the month.

30 hours = *General Equivalency Diploma* activity – all Non-Core hours

The participant does not meet the official work participation requirement due to insufficient core hours but does meet the work participation requirement as part of the *HSC/HSE* pilot.

**Example 3:** A *PATH* participant with a 30-hour weekly requirement has the following participation documented in the *OSMIS* for each week of the month.

5 hours = *Community Service Programs* activity  
25 hours = *General Equivalency Diploma* activity  
30 hours = 5 Core hours and 25 Non-Core hours

The participant does not meet the official work participation requirement due to insufficient core hours but does meet the work participation requirement as part of the *HSC/HSE* pilot.

**Example 4:** During a four-week month, a *PATH* participant with a 30-hour weekly requirement is enrolled in a class for 20 hours per week to complete their secondary education and job searches 10 hours per week. Since the participant does not have enough core hours and will not meet the official work participation requirement, the job search and job readiness (*JSJR*) hours are recorded as other non-countable hours (*ONCH*) in the *OSMIS* as described below:

10 hours = *JSJR* activity recorded as *ONCH* each week  
20 hours = *General Equivalency Diploma* activity each week  
30 hours = 10 *ONCH* hours and 20 Non-Core hours (120 actual monthly hours)

The work participation requirement can be met as part of the *HSC/HSE* pilot if the restrictions on *JSJR* hours are not violated, which includes the 240/360 12-month limit and not job searching for more than four consecutive weeks. To comply the participant would only job search, or preferably engage in job readiness activities, for

a few weeks each month and hours would be entered in the OSMIS as described below.

20 hours = JSJR activity completed and entered in weeks 2 & 3 only  
20 hours = General Equivalency Diploma activity entered each week  
120 hours for the month broken down as 40 Core and 80 Non-Core

This scenario is only applicable if JSJR hours are countable.

**Example 5:** During a four-week month, a two-parent family with a 35-hour weekly requirement (140 monthly requirement) has the following participation documented in OSMIS for each week of the month.

25 hours = General Equivalency Diploma activity (parent #1)  
10 hours = Community Service Programs activity (parent #2)  
35 hours = 10 Core hours and 25 Non-Core hours

The household does not meet the work participation requirement due to insufficient core hours but does meet the work participation requirement as part of the HSC/HSE pilot.

**Example 6:** During a four-week month, a two-parent family with a 35-hour weekly requirement (140 monthly requirement) has the following participation documented in OSMIS for each week of the month.

35 hours = General Equivalency Diploma activity (parent #1)  
0 hours = Non-Participating Parent – Two-Parent activity (parent #2)  
35 hours = 35 Non-Core hours

The household does not meet the work participation requirement due to insufficient core hours but does meet the work participation requirement as part of the HSC/HSE pilot.

### **Identifying Eligible Participants**

For the duration of the pilot, MWAs should identify participants 20 years of age and older that have not completed high school or received an HSE credential and offer information on the HSC/HSE pilot. Participants interested in pursuing a “*Course of Study Leading to a Certificate of General Equivalence*” must complete the appropriate assessment tests necessary for enrollment in such program. Those enrolled in federally- and state-funded adult education programs must be pre-tested in accordance with the State of Michigan [Adult Education Assessment policy](#), dated July 1, 2019.

The MWA must also review action plans for participants currently working to complete their secondary education and adjust scheduled activities to align with the intent of the pilot.

**Example:** A PATH participant is engaged in an adult education program to complete their secondary education while job searching and/or active in a community service program. The MWA should review the scheduled hours and consult with the

*participant to reduce or place on hold the job search and/or community service participation while the participant completes their education.*

Participation in basic skills education does not qualify for involvement in the HSC/HSE pilot as hours would be counted in the “Job Skills Training Directly Related to Employment” activity or the “Education Directly Related to Employment” activity in the OSMIS.

### **Activity Requirements**

In accordance with the PATH Manual, the following applies to the HSC/HSE pilot:

Participation in educational activities may be performed at the educational institution or through distance learning. Independent study is a form of distance learning. Participants in educational activities must be supervised on an ongoing basis at least once each day in which the individual is scheduled to participate.

A standard for measuring progress should be developed by the educational institution in order to monitor participants’ progress. Progress should be judged by mediums such as progress reports, report cards, grade point average, or a time frame within which a participant is expected to complete such education. The MWA is responsible for monitoring progress for those engaged in an independent study program.

Hours counted for participation through distance learning may not exceed the hours required or advised by the educational institution. Study time may count toward participation requirements for educational activities as long as the MWA obtains documentation from the educational institution stating the homework/study expectations of the program. Study time can include both supervised and unsupervised time. Additional requirements are listed below under documenting participation.

### **Documenting Participation**

In accordance with the PATH Manual, all hours of participation reported as actual hours in the OSMIS must be verified every two weeks with documentation which meets the requirements below:

The Education Log (WR-212, WR-213, WR-214, or WR-215) is to be used to document education and training performed at an educational institution or through distance learning. If the educational institution has their own record keeping method such as timecards, attendance records, electronic records, computer log-in/log-out times, or other official verification it may be used in place of the education log, if it fulfills the documentation requirements below:

- Participant’s name.
- Actual hours and dates of participation.
- Name of educational provider.
- Name, signature, and contact information of the verifying individual.

*Note: If computer log-in/log-out times are used as documentation, the periods must be verifiable by the educational institution as periods in which progress was made. Also, electronic signatures are acceptable.*

### Study Time

In order to count study time, the participant's case file must contain documentation of the educational institution's homework/study time expectations. Total study time hours (supervised plus unsupervised) may not exceed the homework/study time expectations of the educational institution. In addition, the following limitations apply:

- Unsupervised study time entered may not exceed the actual time spent in classroom (seat time).
- Supervised study time must occur in a formal study hall at the MWA or the educational institution, where an MWA staff person or appropriate representative of the educational institution can verify the participant's hours of study on the education log.

### Alternative Documentation Process for Distance Learning

If the educational institution will not sign the participant's education log and the institution does not have its own record keeping method for attendance for distance learning programs that meets the criteria above, the following process may be followed:

If the MWA chooses to participate in the alternative documentation process, the participant must provide evidence of work completed and progress made to the MWA at least every two weeks; however, the MWA may request information earlier. This evidence may be feedback from the distance-learning program or copies of work completed. The MWA must monitor the participant's progress and compliance by reviewing information submitted by the participant and/or contacting the school. In addition, the MWA must be available on a daily basis to the participant by telephone, email, or face-to-face for any needed guidance or oversight. The MWA will also sign the education log as the individual verifying the information.

Independent study programs are a form of distance learning and the MWA must follow the above alternative documentation process.

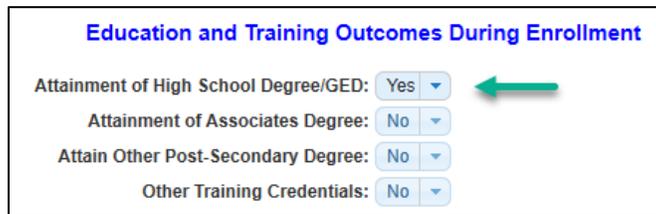
### Case Management and the OSMIS Data Entry

An integral part of the pilot will be setting goals, identifying barriers to progress, and providing supportive services to assist the participant through the completion of their secondary education. **The individual service strategy action plan within the OSMIS must include "non-high school graduate" as a "barrier/skill needed"**. An OSMIS case note must be entered for each participant which indicates they are following the HSC/HSE pilot guidelines. Additional case notes are required monthly to reflect the participant's progress. Case management should be designed to allow the participant to focus on secondary education activities and completion of hours in other activities is only necessary when needed to meet the monthly work requirement.

The MWA must record actual hours of participation in the OSMIS within the High School Completion or General Equivalency Diploma activity. Upon successful completion, the “Credential Received” field within the educational activity must be updated to reflect “High School Diploma” or “HSE”.



Also, the OSMIS registration screen must be updated to reflect the participant earned the credential.



**Goals, Measurement Tools, and Outcomes**

The goal of the pilot is to increase the number of PATH participants who earn a high school diploma (HSD) or HSE credential as a result of participating in the program. Calendar Year (CY) 2019 participant data is being used as a base year for measuring the success of the pilot. The following report provides the number of participants, enrollments in educational activities, and HSD or HSE credential attainments during CY 2019. A similar report will be available in the OSMIS with modifiable date ranges.

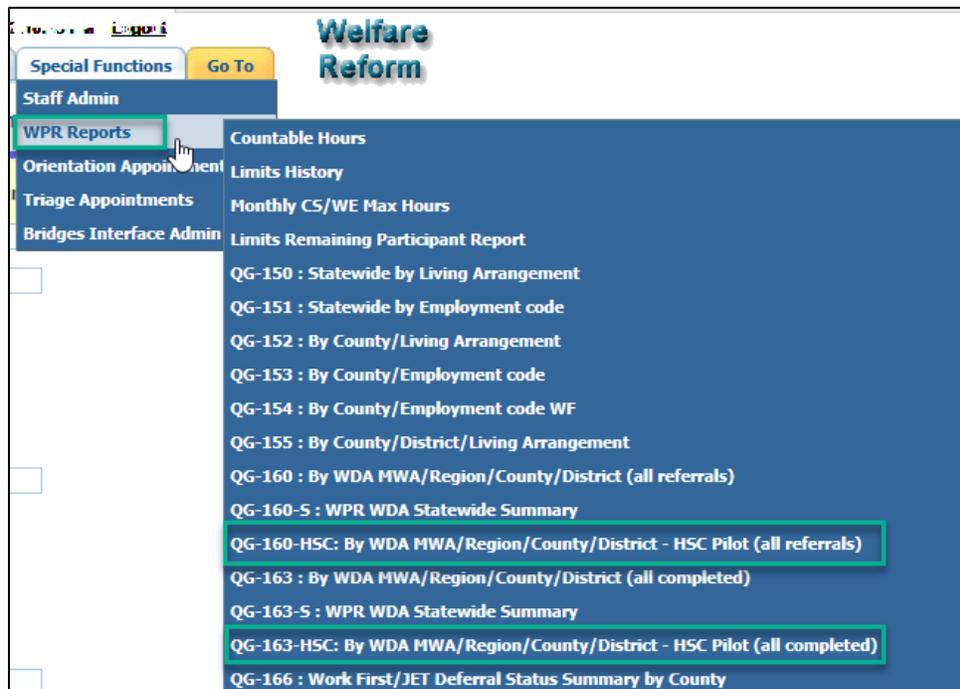
High School Completion (HSC) or General Equivalency Diploma (GED) [including High School Equivalency (HSE)]						
Activities and Attainment of High School Diploma (HSD) or HSE Credential						
Michigan Works! Agency	PATH Participants	Participants without a HSD/HSE at Registration	Participants in High School Completion	Participants in General Equivalency Diploma	Participants in High School GED for 18/19 Years Olds	Participants who Attained HSD/HSE
Berrien/Cass/Van Buren	293	61	0	1	1	0
Capital Area	404	91	1	46	0	1
Detroit Emp Solutions	3502	930	3	26	7	1
GST Michigan Works	1657	344	3	9	11	4
Great Lakes Bay	873	192	5	35	7	3
Macomb/St. Clair	707	117	1	1	2	0
Northeast	91	18	0	4	0	0
Northwest	163	34	0	7	1	0
Oakland County	388	73	0	0	1	0
Region 7B	198	43	4	0	2	1
Southeast	661	114	0	12	2	1
SEMCA	1143	259	2	1	3	1
Southwest	536	142	5	4	5	3
UPWARD Talent Council	175	22	0	2	0	0
West Central	141	28	0	1	2	0
West Michigan Works	1221	258	8	16	8	2
State Total	12052	2704	32	165	52	17

Supplemental information related to the report:

- The “State Total” will be less than or equal to the sum of individual MWAs as active participants may have changed MWAs during the reporting period.
- Participants without an HSD/HSE is based on an educational level less than 12 as recorded on the registration page.
- Attainment of an HSD/HSE includes those with High School Diploma or HSE selected for the “Credential Received” within one of the activities.
- The data will hyperlink to participant listings for each MWA. Availability of the hyperlink detail is limited to the requestor’s MWA.

The first objective will be to increase the number of enrollments in high school completion activities and then to promote continued engagement and progress. The individualized case management the MWA provides, including supportive services, should be designed to increase the likelihood of participants accomplishing the educational milestone.

New WPR reports labeled QG-160-HSC and QG-163-HSC are available in the OSMIS and include a column that reflects the participants who met the work participation requirement based on HSC/HSE pilot guidelines.



Report Criteria															
Data captured through: Jan 07, 2020 @ 06:00 PM			Report Month: January 2020		MWA: 02 - Region 7B		Living Arrangement: Single Parent								
MWA Overall WPR Stats:			# Participants	# Participants that Meet Goal			WPR %								
			28	2			7.1								
WPR Statistics															
<a href="#">Show WPR Stats</a> <a href="#">Hide WPR Stats</a>															
Detailed Listing of Participants															
<a href="#">Print Detailed Listing of Participants</a> <a href="#">Print Entire Report</a>															
Filter Columns By:															
DHS MWA	MIS Region	DHS County	DHS District	Empl Code	Case No.	Refugee	Client/ Rec Id	Recipient Name	Required Hours	Actual Hours	Countable Hours (*)	Remaining Hours	Meet Goal?	HSC/HSE	
02	0204	losco	31032	WF		N			150	150	150	150	100	N	Y

Meeting the HSC/HSE pilot work participation requirement will be based on the following criteria:

- The participant did not meet the goal on the QG-160/QG-163 reports.
- The participant has actual hours in the OSMIS High School Completion or General Equivalency Diploma activity.
- The participant's countable hours equal or exceed their required hours.

If all three statements are true, the individual will meet work participation as part of the HSC/HSE pilot.

The first time an individual meets the HSC/HSE pilot work participation goal, the HSC/HSE indicator will be changed from 'No' to 'Yes' by the OSMIS and displayed on the Welfare Reform registration screen within the 'Special Initiative Indicators' section.

**Special Initiative Indicators**

Regional Skills Alliance Participant:

Business Resource Network Participant:

Skilled Trades Training Fund Participant Indicator:

Navigator Referred:

HSC/HSE: No

**Special Initiative Indicators**

Regional Skills Alliance Participant:

Business Resource Network Participant:

Skilled Trades Training Fund Participant Indicator:

Navigator Referred:

HSC/HSE: Yes

The HSC/HSE indicator cannot be modified by an OSMIS user and remains until the registration is terminated in the OSMIS.

The pilot will also be measured by the QG-160-HSC and the QG-163-HSC monthly WPR summary reports that represent the WPR, adjusted for pilot guidelines. Below is a sample of a QG-163 summary report which has not been adjusted for those meeting the work participation requirement through the pilot.

WD PATH Work Participation Rate Report QG-163													
By DHHS MWA Code													
Issued February 28, 2020													
	1	2	3	4	5	6	7	8	9	10	11	12	
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	FYTD
Michigan Works! Agency	2019	2019	2019	2020	2020	2020	2020	2020	2020	2020	2020	2020	
2 - Region 7B	52.4%	51.2%	43.2%	38.3%									46.3%
4 - Great Lakes Bay	57.5%	64.2%	62.3%	53.3%									59.3%
5 - Berrien/Cass/Van Buren	65.5%	71.4%	59.6%	50.9%									61.9%
6 - UPWARD Talent Council	40.8%	46.7%	44.0%	28.6%									40.0%
7 - Detroit Emp Solutions	58.6%	61.2%	63.9%	58.6%									60.6%
13 - GST Michigan Works	48.2%	55.4%	58.2%	49.7%									52.9%
14 - Southwest	53.4%	58.3%	55.3%	57.0%									56.0%
16 - West Central	61.8%	73.9%	54.5%	50.0%									60.1%
17 - Capital Area	50.7%	54.8%	62.5%	62.1%									57.5%
19 - Macomb/St. Clair	54.0%	58.6%	58.2%	50.3%									55.3%
21 - Northeast	50.0%	55.0%	57.9%	42.1%									51.3%
22 - Northwest	23.5%	37.5%	50.0%	41.7%									38.2%
23 - Oakland County	47.8%	50.5%	45.8%	34.2%									44.6%
30 - SE Michigan Consortium	55.0%	61.0%	66.5%	64.1%									61.7%
31 - SEMCA	44.6%	55.5%	57.3%	47.8%									51.3%
33 - West Michigan Works	43.1%	49.1%	49.5%	36.7%									44.6%
Statewide	50.4%	56.5%	55.5%	51.8%									53.6%

The following sample QG-163-HSC/HSE summary report has been adjusted for those meeting the work participation requirement through the pilot.

WD PATH Work Participation Rate Report QG-163-HSC/HSE													
By DHHS MWA Code													
Work Participation Rate Adjusted for the High School Completion or Equivalency Pilot													
Issued February 28, 2020													
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	FYTD
Michigan Works! Agency	2019	2019	2019	2020	2020	2020	2020	2020	2020	2020	2020	2020	
2 - Region 7B				46.2%									46.2%
4 - Great Lakes Bay				62.5%									62.5%
5 - Berrien/Cass/Van Buren				59.6%									59.6%
6 - UPWARD Talent Council				35.6%									35.6%
7 - Detroit Emp Solutions				71.3%									71.3%
13 - GST Michigan Works				57.3%									57.3%
14 - Southwest				67.0%									67.0%
16 - West Central				68.2%									68.2%
17 - Capital Area				76.1%									76.1%
19 - Macomb/St. Clair				66.7%									66.7%
21 - Northeast				50.0%									50.0%
22 - Northwest				52.6%									52.6%
23 - Oakland County				50.0%									50.0%
30 - SE Michigan Consortium				72.5%									72.5%
31 - SEMCA				64.6%									64.6%
33 - West Michigan Works				45.1%									45.1%
Statewide				63.4%									63.4%

Based on DHHS coding of participants as 'WF' or 'WL'. Includes all referred (even those who do not show for orientation), Run by MWA Code assigned by DHHS.

Work Participation Rate is based on Countable Hours

WD - Run February 28, 2020

Fiscal YTD is October 2019 to current month

Legend: 0 - 29.9% 30-39.9% 40-49.9% 50-59.9% 60-69.9% 70-79.9% 80%+

For the duration of the pilot, the MWAs should use the report adjusted for the HSC/HSE pilot as their WPR measurement.

Please note the QG reports available to the Michigan Department of Health and Human Services staff in Business Objects, the countable hours report available in the OSMIS, and the official TANF WPR calculated for the federal government will not be adjusted for the HSC/HSE pilot.

Electronic surveys will be distributed to the MWAs in July 2020 to gather feedback on the implementation and initial results of the pilot at the local level. The MWAs will be asked to share what has worked well and where improvements can be made to positively impact the duration of the pilot or to extend the pilot.

### **Plan Narrative**

The plan narrative should briefly explain how the HSC/HSE pilot will be implemented throughout the MWA service delivery area relative to the topics in Attachment A.

### **Allocations**

No additional funding will be provided for this pilot. MWAs must use the funding allocated in policy issuance 19-28 and subsequent changes regarding PATH Fiscal Year 2020 Plan Instructions.

**Action:** The MWA officials shall submit a plan narrative via email within 30 calendar days from the official date of this policy to [TED-TSDIV@michigan.gov](mailto:TED-TSDIV@michigan.gov).

*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 by phone at 517-335-5858.

This policy issuance 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. Please contact Ms. Melissa Stebbins by telephone at 517-241-9834 or by email at [StebbinsM@michigan.gov](mailto:StebbinsM@michigan.gov) for details.

WD is funded by State and Federal funds. More details are available on the Legal Disclaimer page at [www.michigan.gov/WDA](http://www.michigan.gov/WDA).

**Expiration  
Date:**

December 31, 2020

JB:LM:ms  
Attachment

**Statewide High School Completion or Equivalency (HSC/HSE) Pilot  
Plan Narrative**

A. Michigan Works! Agency (MWA) Identification Information

HSC/HSE Plan Contact Person: Identify the MWA contact person (including telephone number and email address) for purposes of discussing the plan contents.

B. Address the following topics in a brief narrative

- Identification of the Partnership.Accountability.Training.Hope. population that does not have a high school diploma or high school equivalent credential.
- Marketing the pilot opportunity.
- MWA educational assessment policy.
- Availability of adult education partners throughout the MWA service delivery area.
- The MWA's plan for supporting the independent study option.
- Anticipated types of supportive services to be provided.
- Any additional program delivery strategies designed to support the pilot.