DEPARTMENT POLICY

FIP Only

Dependent children are expected to attend school full-time, and graduate from high school or a high school equivalency program, in order to enhance their potential to obtain future employment leading to self-sufficiency.

Dependent children ages 6 through 17 must attend school full-time.

Age 6 to 15

A dependent child age 6 through 15 must attend school full-time. If a dependent child age 6 through 15 is not attending school full-time, the entire Family Independence Program (FIP) group is not eligible to receive FIP.

Note: A child may be 6 years old and not enrolled in school if the child's sixth birthday falls after the enrollment deadline for the current school year.

Age 16 or 17

A dependent child age 16 or 17 who is not attending high school full-time is disqualified from the FIP group in Bridges.

A dependent child age 16 or 17 who has graduated from high school is **not** required to participate in the Partnership. Accountability. Training. Hope. (PATH) program; see

Minor Parent

Minor parents under age 18 must attend high school full-time; see BEM 201, Minor Parents. Refer a minor parent to PATH once they graduate high school; see BEM 230A.

FAP Only

A person enrolled in a post-secondary education program may be in student status, as defined in this item. A person in student status must meet certain criteria in order to be eligible for assistance.

DEFINITIONS

FIP Only

MDE

Michigan Department of Education.

ISD

Intermediate school district.

High school

A course of study leading to the attainment of a high school diploma, or its equivalency. The following programs are considered to meet the definition of high school equivalency:

- Adult basic education (ABE).
- Alternative education.
- Charter school.
- General education development (GED).
- Home school.
- Non-public school.
- Vocational or technical training.

FIP and FAP

School means a:

- Public school.
- Nonpublic school registered with the MDE.
- Home school.

SCHOOL ATTENDANCE

Dependent Children

FIP Only

Dependent children ages 6 through 18 must meet one of the conditions described below:

- A child age 6 through 17 must be a full-time student.
- A child age 18 must attend high school full-time until either the child graduates from high school or turns 19, whichever occurs first.

A dependent child must be enrolled in and attending a school as defined in this item. Courses which are not administered by a school do **not** meet the requirement of school attendance. Correspondence or web-based courses administered by a school or used as part of a home school curriculum are acceptable.

Consider a dependent child as still meeting the school attendance requirement during official school vacations or periods of extended illness, unless information is provided by the client that the dependent child does **not** intend to return to school.

Note: If a refugee or dependent child with equivalent immigration status has resettled in Michigan during a school year or a summer month and the school will not allow enrollment for the dependent child until the start of the next school term/year, email the FIP-SDA-RCA policy mailbox for a policy exception: see BEM 100, Introduction, for a policy exception.See BEM 630, Refugee Assistance Program for equivalent immigration status.

Minor Parents

FIP Only

A minor parent must attend school full-time. If a minor parent fails to comply with this requirement, the minor parent and the minor parent's child(ren) are not eligible for FIP; see BEM 201.

STUDENT STATUS

RCA and RMA Only

A full-time student in post-secondary education is **not** eligible for Refugee Cash Assistance (RCA) or Refugee Medical Assistance (RMA); see BEM 630. The school determines full-time enrollment and attendance.

FAP Only

A person is in student status if they are enrolled half-time or more in a:

- Vocational, trade, business, or technical school that normally requires a high school diploma or an equivalency certificate.

- Regular curriculum at a college or university that offers degree programs **regardless** of whether a diploma is required.

In order for a person in student status to be eligible, they must meet one of the following criteria:

- Age 17 or younger or age 50 or older.
- Receiving FIP.
- Enrolled in an institution of higher education as a result of participation in:
  - A Job Training Partnership Act (JTPA) program.
  - A program under section 236 of the Trade Readjustment Act of 1974 us 19 USC 2341, et. seq.
  - Enrolled in a FAE&T or FAE&T plus, in a component or components that are either:
    - Part of a program of career and technical education as defined under the Perkins Strengthening Career and Technical Education Act (Perkins V) and a course of study that will lead to employment.
    - Are limited to remedial courses, basic adult education, literacy, or English as a second language.
- An employment and training program for low-income households operated by state and local government where one or more of the components of such program is at least equivalent to an acceptable FAP employment and training program component. This includes a program under the Carl D. Perkins Career and Technical Education Improvement act of 2006, administered by one of the 35 participating colleges that will lead to employment.

  Note: Some examples of career and technical programs offering certificate or diploma that will lead to employment are data entry occupations, medical and health care careers, HVAC and refrigeration, hospitality and tourism management.
- Another state or local government employment and training program.

- Physically or mentally unfit for employment.
- Employed for at least an average of 20 hours per week and paid for such employment.
- Self-employed for at least an average of 20 hours per week and earning an average weekly income at least equivalent to the federal minimum wage multiplied by 20 hours.
- Participating in an on-the-job training program. A person is considered to be participating in an on-the-job training program only during the period of time the person is being trained by the employer.
- Participating in a state or federally-funded work study program (funded in full or in part under Title IV-C of the Higher Education Act of 1965, as amended) during the regular school year.

  To qualify under this provision the student must be approved for work study during the school term and anticipate actually working during that time. The exemption:

  - Starts the month the school term begins or the month work study is approved, whichever is later.
  - Continues until the end of the month in which the school term ends, or when the local office becomes aware that the student has refused a work-study assignment.
  - Remains between terms or semesters when the break is less than a full month, or the student is still participating in work study during the break.
- Providing more than half of the physical care of a group member under the age of six.
- Providing more than half of the physical care of a group member age six through eleven and the local office has determined adequate child care is not available to:
  - Enable the person to attend class and work at least 20 hours per week.
  - Participate in a state or federally-financed work study program during the regular school year.

- A single parent enrolled full-time in an institution of higher education who cares for a dependent under age 12. This includes a person who does not live with their spouse, who has parental control over a child who does **not** live with their natural, adoptive or stepparent.

For the care of a child under age six, consider the student to be providing physical care as long as they claim primary responsibility for such care, even though another adult may be in the Food Assistance Program (FAP) group.

When determining the availability of adequate child care for a child six through 11, another person in the home, over 18, need not be a FAP group member to provide care.

The person remains in student status while attending classes regularly. Student status continues during official school vacations and periods of extended illness. Student status does not continue if the student is suspended or does not intend to register for the next school term (excluding summer term).

HOURS OF ENROLLMENT AND ATTENDANCE

FIP and FAP

Schools determine:

- The level of enrollment (such as full-time, half-time, or part-time).
- Attendance compliance.
- Suspensions (such as reasons for/duration).

Note: Consider dependent children attending half-day kindergarten as attending full-time.

HOME SCHOOLING

FIP and FAP

Parents and legal guardians must direct and oversee the home schooling of their dependent child in an *organized educational program*. The parent or legal guardian is responsible for assigning

homework, giving tests and grading tests. If home schooling continues through grade 12, the parent or legal guardian issues a high school diploma to the graduate. The organized educational program must include the subject areas of reading, spelling, mathematics, science, history, civics, literature, writing, and English grammar. Home school families may purchase the textbooks and instructional material of their choice. Parents or legal guardians are encouraged to maintain student records of progress throughout the year. There are no required tests for a home school student, but the parent or legal guardian is responsible for administering tests based upon the curriculum they use.

The annual registration of a home school with the MDE is voluntary. It is not required unless the student has special needs and is requesting special education services from the local public school or intermediate school district. A list of registered home schools is provided to intermediate school district superintendents each year. A parent or legal guardian may register a home school with the MDE by using the SM-4325, Nonpublic School Membership Report. Completion of the form is important. A home school student may be eligible to receive auxiliary services through their local public school district or ISD.

It is not required that a parent or legal guardian inform their local school of the decision to home school. However, if the parent or legal guardian does not inform their local school, this may result in the student being marked absent and the involvement of the truancy officer. Notification may be a phone call or a written note to the district.

CHILDREN NOT ENROLLED IN SCHOOL/HOME SCHOOL

FIP Only

A referral must be made to the local Intermediate School District's attendance officer if it is verified a dependent child age 6 to 17 is not enrolled/attending a public school or is not participating in an organized education program. Document in *Case Comments* in Bridges that a referral to the attendance officer has been made.

A referral may be made to Children's Protective Services if it is verified a dependent child age 6 to 17 is not enrolled/attending a public school or is not participating in an organized education program

and the case worker suspects other forms of child abuse and neglect.

ATTENDANCE COMPLIANCE TEST

FIP Only

If verification is returned that a dependent child or minor parent **receiving** FIP is not attending school full-time, an attendance compliance test is required **before** taking appropriate action regarding the FIP group.

The attendance compliance test requires the dependent child or minor parent to attend **all** school days for 21 consecutive calendar days.

Initiating the Attendance Compliance Test

In order for a dependent child or minor parent to complete the attendance compliance test, do the following:

- Generate the MDHHS-5443, FIP Student Attendance Compliance Test, and send to the FIP group. The MDHHS-5443 explains to the head of household that a dependent child or minor parent has been verified as not enrolled or not attending school full-time. In order for the FIP group and/or dependent child age 16 or 17 to continue to receive FIP, the dependent child or minor parent must complete a 21 day attendance compliance test. In order for FIP benefits to continue, the DHS-3380, Verification of Student Information, must be returned in 31 days verifying full-time attendance.
- Generate the DHS-3380 and send to the FIP group with the 21 Day Compliance Test box checked. The DHS-3380 must be sent with the DHS-3503-F, Verification Checklist, to be returned in 31 days.

If any day in the mandatory 21 calendar day attendance compliance test is during summer break, verify the dependent child or minor parent's enrollment. Once the new school year has started, initiate the attendance compliance test. Create a manual task and reminder in Bridges to complete the attendance compliance test at the start of the new school year.

Results of the Attendance Compliance Test

If the DHS-3380 is returned stating the dependent child or minor parent has attended all the school days in the past 21 calendar days, FIP eligibility continues for the FIP group and/or the dependent child age 16 or 17.

If the DHS-3380 is returned stating the dependent child or minor parent has not attended all the school days in the past 21 calendar days, take appropriate action regarding the FIP group based on department policy in this item.

If the DHS-3380 is not returned; see Bridges Administrative Manual (BAM) 130, Verification and Collateral Contact, and initiate FIP group closure for failure to return requested verification.

Client Assistance

If the client contacts the department and requests an interview to resolve school attendance issues and/or barriers, one must be provided before taking appropriate action on the FIP group. If the client requests assistance removing current barriers for their child(ren) to complete the attendance compliance test or to attend school full-time, assist the client with barrier removal if possible; see BEM 232, Direct Supportive Services.

Note: Any barriers identified should be added to the head of household's Family Self-Sufficiency Plan (FSSP). If barriers are identified and entered into the FSSP and a dependent child or minor parent does not complete the attendance compliance test, do **not** impose an additional employment and training/FSSP sanction. Only take action on the FIP group based on department policy in this item.

REGAINING FIP ELIGIBILITY AFTER PREVIOUSLY FAILING STUDENT ENROLLMENT/ ATTENDANCE REQUIREMENT

FIP Only

Full-time school attendance is mandatory for 21 consecutive calendar days **before** regaining FIP eligibility if any of the following occurred previously:

- A dependent child age 6 to 15 failed to attend school full-time and the FIP group lost eligibility.
- A dependent child age 16 or 17 failed to attend high school full-time and the child was disqualified from the FIP group.
- A minor parent failed to attend school full-time and was denied FIP benefits at application or was a disqualified dependent child on a FIP group.

Dependent children or a minor parent listed above must attend all school days in the 21 consecutive calendar days.

If any day in the mandatory 21 calendar day attendance requirement is during summer break, verify school enrollment for the following school year prior to certifying FIP eligibility during the summer break. Once the new school year has started, verify the dependent child is attending school full-time. Create a manual task and reminder in Bridges to verify full-time attendance after school starts. Once the school year has started and it is verified the minor parent or dependent child is **not** attending school full time, take appropriate action regarding the FIP group based on department policy in this item.

Example: Ted would start the mandatory 21 calendar day attendance requirement on May 28. Since summer break starts June 7, verify Ted is enrolled in school for the following school year for the application processing. Create a manual task and reminder in Bridges for the start of the new school year.

For a new FIP application, it is possible a previously noncompliant child has attended the past 21 calendar days in school. The past 21 day attendance is sufficient verification to satisfy the compliance

requirement. Do not require the additional completion of 21 days from the application date.

Example: Mary's FIP closed in January for her daughter Jane not attending school full-time. Jane starts attending school full-time again in April. On Nov. 30, Mary applies for FIP. It is required to verify Jane's full-time attendance for 21 consecutive calendar days before FIP eligibility can be approved. It is verified Jane has been attending full-time since April, the 21 days before the Nov. 30 application date satisfies the 21 day attendance requirement at application.

VERIFICATION REQUIREMENTS

FIP Only

Accept the client's statement that a 6 year old is enrolled and attending school full-time unless questionable.

Verify school enrollment and attendance at application and redetermination beginning with age 7.

Verify school enrollment and attendance at application, redetermination and at each birthday beginning with age 16.

Verify school enrollment and attendance for minor parents at application, redetermination and at each birthday.

Verify the completion and results of the attendance compliance test for dependent children or minor parents receiving FIP.

Verify the completion and results of the 21 day attendance requirement for dependent children or minor parents at FIP application.

FAP Only

If a home school has not voluntarily registered with MDE, accept the client's statement.

FIP Only

School enrollment and attendance:

- DHS-3380, Verification of Student Information. At each birthday a child has beginning with age 16, Bridges automatically sends the DHS-3380.

- For home schools, verification of the organized educational program used, curriculum agenda, instruction materials or student records may be used. The SM-4325, Nonpublic School Membership Report, may also be used, but completion of this form is voluntary for home schools.

- Telephone contact with the school.

- Other acceptable documentation that is on official business letterhead.

Attendance compliance test or 21 day attendance requirement:

- DHS-3380, Verification of Student Information.
- Telephone contact with the school.
- Other acceptable documentation that is on official business letterhead.

FAP Only

Hours of employment:

- Pay check stubs.
- Written, signed statement from employer.

Self-Employment Earnings and Hours:

- Primary source - Income tax return provided:
    - The client hasn't started or ended self-employment, or received an increase/decrease in income, etc.
    - The tax return is still representative of future income.
    - The client filed a tax return.
- Secondary source - DHS-431, Self-Employment Statement, with all income receipts to support claimed income.
- Third Source - DHS-431, Self-Employment Statement, without receipts

Physically or Mentally Unfit for Employment:

- Award letter or other verification of eligibility for Retirement, Survivors, and Disability Insurance (RSDI) or Supplemental Security Income (SSI) on the basis of disability.

- Award letter or other verification of eligibility for disability benefits issued by government or private sources.
- Statement from an M.D. or D.O.
- Statement from a psychologist.

Perkins Program:

- Enrollment letter stating the individual is enrolled in the Perkins Program.
- DHHS-3380, Verification of Student Information.
- MDHHS - 5857, Michigan Community College Verification Form.
- Collateral contact with the community college via the Employment and Training mailbox: Policy-employment@michigan.gov

LEGAL BASE

FIP

42 USC 619
MCL 380.10
MCL 380.1561-1599
MCL 400.57 et seq.
MCL 712A.2 et seq.

RCA/RMA

45 CFR 400.53

FAP

7CFR 273.5
Food and Nutrition Act of 2008, as amended, Sec. 5. 7 U.S.C. 2014