

+-----+
| LOCAL COMMISSIONERS MEMORANDUM |
+-----+

Transmittal No: 92 LCM-60

Date: April 9, 1992

Division: Income Maintenance

TO: Local District Commissioners

SUBJECT: JOBS Participation Rate as it Relates to Homework

ATTACHMENTS: None

The purpose of this memorandum is to clarify the counting of homework in the calculation of the Job Opportunities and Basic Skills Training (JOBS) participation rate. Homework is the study time or other out-of-class preparation time in addition to the scheduled class hours for educational training, job skills training, or post-secondary education activities.

Federal JOBS regulations require states to meet an annual participation rate to qualify for enhanced federal reimbursement. The participation rate is based upon the number of individuals whose participation in JOBS activities averages 20 hours a week for any given month.

Local districts have expressed concerns on their ability to meet mandated participation rates, because many schools or training providers define full time attendance as fewer than 20 hours a week. Individuals enrolled in such educational or training activities could not be included in the participation calculation. Districts have wanted to count these individual's homework time as part of their weekly schedule. However, federal regulations specifically excludes unscheduled homework from an individual's scheduled hours. A 20 hour schedule must consist of activities that are scheduled, structured and supervised. Recent federal policy interpretation formally recognizes supervised homework as part of a schedule of activities, if certain criteria are met.

JOBS does not limit the number of hours to be included for participation purposes to the number of credit hours assigned by the school. JOBS allows any scheduled part of an assigned educational activity to be counted as participation, as long as the individual has attended at least 75 percent of the monthly hours scheduled.

Unscheduled homework, study time, and other out-of-class preparation time cannot be counted in an individual's hours of participation. The federal JOBS regulations do not give credit for homework as a JOBS activity because of the great variation among educational program with respect to out-of-class preparation time and the difficulty in accounting for this administratively.

Supervised homework (which may include study time or other out-of-class preparation) can be counted in calculating the JOBS participation rate, if it meets the following criteria, which render it comparable to the on-site classroom structure associated with an educational or training program:

- (1) The homework time scheduled for the participant is determined to be directly correlated both to the class time scheduled for the participant's current course work and the demands of that course work for out-of-class preparation;
- (2) The homework time is scheduled and the schedule is maintained on a weekly basis;
- (3) The individual is under supervision of the educational/training institution, or the local district; and
- (4) The individual is "satisfactorily participating" in the component activity (which consists of both the on-site educational activity and the supervised homework time) as required by Department Regulation 385.2(h).

Supervised homework in and of itself may not be identified as a component activity. For participation purposes, such out-of-class, supervised preparation must be an integral part of an on-site educational/training activity and all of the criteria for supervised homework specified above must be met. Since supervised homework time is considered part of the component activity to determine satisfactory participation, the individual must have attended at least 75 percent of the sum of the scheduled class hours and supervised homework time. Local districts must approve the educational or training activity and include it in the individual's employability plan.

Hours of study time may not be granted automatically merely to bring an individual's participation up to the 20 hours per week standard. The supervised homework time must be directed toward completion of a classroom course of study. The preparation outside of class should be expected/recommended by the institution as an adjunct to the individual's particular course of study. Districts should discuss with their education and training providers what policies they have established which correlates the number of hours of out-of-class preparation with scheduled class time for a particular course of study.

Date April 9, 1992

Trans. No. 92 LCM-60

Page No. 3

The need for supervised homework must be determined on an individual basis. Both the demands of the out-of-class preparation and the institution's policy (on the ratio of hours of out-of-class preparation per hour to scheduled class time) should be considered when the determination is made as to whether scheduled out-of-class preparation is appropriate for the individual. If supervised homework is determined to be appropriate, the number of hours per week actually scheduled for the individuals must reflect their needs, and be consistent with the district consideration of the demands of out-of-class preparation and the particular institution's policy.

Should you have questions or require further information, please call the Bureau of Employment Programs at 1-800-342-4100, extension 3-8377 (OA Userid AV3070).

This information will be included in the next Employment Manual update.

Oscar R. Best, Jr.
Deputy Commissioner
Division of Income Maintenance