



**PROMISE JOBS POLICY MEMO**

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**FROM:** Ann Wiebers, Administrator, Division of Financial, Health and Work Supports

**SUBJECT: PROMISE JOBS MEMO #164**

**DATE: November 3, 2008**

**Summary:**

This policy memo implements revised policies and procedures for:

- ◆ **Work Experience Placement (WEPs) and Unpaid Community Service (UCS).**
  - Limits the required number of monthly hours of participation:
    - **Single parent family with child under 6** = Maximum hours per month equal the amount of the family's monthly FIP grant and food assistance divided by the minimum wage.
    - **Not a single parent family with a child under 6** = Maximum hours equal the amount of the family's monthly FIP grant divided by the minimum wage.
    - The limit applies to the entire family if more than one member is participating in WEP or UCS.
  - Removes job search *requirement* for WEP participants who are not in classroom training to allow more flexibility. Participants can continue to combine WEP and UCS with job search when appropriate but can also combine WEP and UCS with other FIA activities if more appropriate.
  - Requires the UCS work site to verify hours of participation on form 470-2617, *Time and Attendance*.
  - Clarifies reporting procedures when person is participating in WEP or UCS, including when participating in another FIA activity at the same time.

- ◆ **Self-Employment.**
  - Removes requirement to verify earnings and hours of employment monthly.
  - Staff will review progress at least once every six-months.
  - Informs staff that DHS will begin using the net self-employment income entered by the IM worker for federal reporting of a self-employed person's hours of employment.
  - PROMISE JOBS staff can see the calculation of hours based on FIP income in PJCase.
  
- ◆ **Education.**
  - New requirements for verifying and reporting actual hours of participation.
  - New limits and requirements for reporting study time.
  - Informs staff of new DHS reporting procedure for persons participating in a BA/BS training program.
  - Clarifies that PROMISE JOBS cannot deny a participant's request for training from a particular education facility in Iowa due to distance or because there is a nearer facility offering the same program as there is not administrative rule support to do so.

**Effective Date:**

November 3, 2008

Please make this information available to PROMISE JOBS staff in each Service Delivery Region as quickly as possible. If you have questions, please contact Shari Seivert by e-mail at [sseiver@dhs.state.ia.us](mailto:sseiver@dhs.state.ia.us) or by calling (515) 281-0703 or Janet Shoeman by e-mail at [jshoema@dhs.state.ia.us](mailto:jshoema@dhs.state.ia.us) or by calling (515) 281-6082.

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## **WORK EXPERIENCE PLACEMENT (WEP) AND UNPAID COMMUNITY SERVICE (UCS)**

### **Current Policy**

#### *Hours of Participation*

Participants using WEP as an FIA activity are assigned to a work site with a schedule that uses a maximum of eight hours per day and four days per week, or 32 hours per week.

Participants using unpaid community service as an FIA activity are responsible for locating and making arrangements with the work site, including the establishment of days, hours, tasks, etc. Participants can be required to participate at a level that is equivalent to full-time employment.

#### *Required Job Search for WEP Participants*

WEP participants must participate in job-seeking activities one day per week unless they are also participating in classroom training activities. Job-seeking activities include a minimum of five employer contacts per week, unless fewer are appropriate due to individual circumstances.

#### *Verifying Hours of Participation*

WEP sponsors complete Time and Attendance, form 470-2617, to verify the hours of participation for a given month by the 10<sup>th</sup> calendar day of the next month.

UCS work sites complete Unpaid Community Service Monthly Report, form 470-3097, to verify if the participant is carrying out the terms of the agreement between the work site and participant, and if the participant's performance is satisfactory.

#### *Reporting Hours of Participation*

The PROMISE JOBS Provider Manual instructs staff to "follow the procedures as specified by your agency and approved by DHS to meet federal reporting requirements".

## New Policy

**Legal Reference: 441 IAC 93.115(239B), 93.121(239B), 93.135(239B)**

### *Maximum Hours of Participation*

#### WEP/UCS Subject to the FLSA

A person who is considered an "employee" under the Department of Labor's Fair Labor Standards Act (FLSA) must be compensated at the federal or state minimum wage, whichever is higher. When participants in WEP and UCS arrangements perform work tasks or services while at the worksite, the time spent completing work tasks and services is subject to the FLSA and they must be compensated as previously described.

Consider the family's monthly FIP grant as compensation. If the family is a single parent family with a child under 6, consider the family's monthly FIP grant plus food assistance as compensation.

When a participant in WEP or UCS will be participating in activities that are subject to the Fair Labor Standards Act, limit the number of hours of participation in work tasks and services as follows:

- ◆ **Single parent family with child under 6:** Maximum monthly hours equal the total amount of the family's monthly FIP grant plus food assistance, divided by the federal or state minimum wage, whichever is higher. See *Exception to Participation Requirements for Single Parents With a Child Under 6* for more information.
- ◆ **Not a single parent family with a child under 6:** Maximum monthly hours equal the family's monthly FIP grant divided by the federal or state minimum wage, whichever is higher.

DHS' PJCcase system automatically calculates and displays the maximum monthly hours for each referred participant in the *WEP/CS Hours Limit* field of the PJCcase PERSON screen. The calculation includes the FIP grant and food assistance for single parent families with a child under 6. PJCcase updates the limit at ABC cut-off to reflect any changes in amount of the family's monthly grant, and food assistance, if applicable.

#### WEP/UCS Not Subject to the FLSA

Hours of participation in court-ordered community service are not subject to the FLSA and not subject to the above limits. Additionally, any hours spent at a WEP or UCS site not completing an actual task or service comparable to employment is not subject to the FLSA and not subject to the above limits.

**Example:** Participant appears at the WEP or UCS site and spends 6 hours following another employee or volunteer and observing the employee or volunteer complete tasks or services.

Contact your PROMISE JOBS Coordinator at IWD with questions regarding whether or not a particular WEP or UCS assignment is subject to the FLSA.

### *Using WEPs and UCS as an FIA Activity*

Continue to consider a family's individual circumstances when determining a participant's expected level of participation in WEP and UCS.

Due to the above limits, many participants who are able to participate at a level that is equivalent to full-time employment will not be able to meet their FIA obligations using WEP and UCS alone.

Combine WEP and UCS with other activities, such as individual job search or classroom training, to bring the participant up to a level that is equivalent to full-time employment. Expect a lesser level of participation when the participant is unable to participate full-time due to problems or barriers to participation.

Policy no longer *requires* that WEP clients participate in job-seeking activities unless they are also participating in classroom training. Under new policy, participants can continue to combine WEP and UCS with job search activities when appropriate but can also combine WEP and UCS with other FIA activities when more appropriate. Consider individual participant circumstances when determining other activities that are appropriate.

Continue to combine job-seeking activities with WEP or UCS when appropriate due to participant circumstances. Use the "individual job search" activity in this situation.

### **Exception to Participation Requirements for Single Parents With a Child Under 6:**

A single parent with a child under 6 must participate an average of 20 hours per week to meet federal work participation rates. Other parents must participate an average of 30 hours per week to meet rates. For federal reporting purposes, a single parent participating in WEP or UCS the maximum number of hours allowed by the limits above is considered to be meeting the rate, even if not participating the required 20 hours. Consider this exception when determining the expected level of participation for a single parent family with a child under 6.

### **Work Experience Placement (WEP):**

- ◆ When WEP is the current FIA activity, and you have matched the participant with a potential sponsor, determine expected hours of participation at the time you schedule the WEP interview.
- ◆ When referring a participant for a WEP interview, enter the expected **monthly** hours of participation at the WEP site when completing form 470-0810, *Referral for Work Experience*.
  - ◆ Adjust the form to say “hours per month” rather than “hours per week”.
  - ◆ Enter no more than the maximum **monthly** hours as displayed in PJCCase.
- ◆ Notify the participant in writing of the WEP participation expectations by including the specific expectations in the FIA, in a *Notice of Appointment or Participation*, or other written notification.

### **Unpaid Community Service (UCS):**

- ◆ When UCS is the current FIA activity, the participant is responsible for locating and making arrangements with the work site, including establishing the days, hours, and tasks. Assist with this process, such as providing the participant with potential work sites.
- ◆ Determine expected hours of participation at the time you notify the participant in writing of the participation expectations, either by including the expectations in the FIA, in a *Notice of Appointment or Participation*, or other written notification. Require no more than the maximum monthly hours as displayed in PJCCase, unless the community service is court-ordered.

If two or more FIA-responsible members of the same FIP family will participate in WEP or UCS activities that are subject to the FLSA, the **total** required hours of participation for all FIA-responsible members for these two activities **cannot** exceed the maximum limits for monthly hours. PJCCase displays the family's maximum limit for each FIA-responsible person.

#### *Adjusting Hours of Participation in WEP and UCS*

When reviewing hours of participation in WEP or UCS for the prior month, check PJCCase and scheduled hours of participation to determine if the participant's maximum hours have changed and if required hours of participation need to be adjusted for the next month.

If maximum hours of participation for WEP and UCS have changed, this means the amount of the grant, or food assistance if applicable, has changed. Determine the reason for the change by reviewing the following:

- ◆ IWorks for the current FIP and food assistance amounts, if applicable,
- ◆ PJCase Client Data Application for a change in earnings or other income and/or,
- ◆ ETS for a change in family members.

Contact the IM worker if you cannot determine the reason for changed benefits.

If the participant has obtained employment, send a written request for verification of actual hours of employment unless you have adequate verification from another source. See **PROMISE JOBS Memo 162** for more information.

Schedule the participant to discuss renegotiation of the FIA when appropriate.

If participation in WEP or UCS needs to be terminated, or if the participant's schedule needs to be changed:

- ◆ Notify the WEP sponsor or UCS work site and participant in writing of:
  - The termination, or
  - The participant's new maximum limit and the need to change monthly scheduled hours of participation.
  - Change or terminate WEP or UCS as of the 1<sup>st</sup> of the next calendar month.

If the participant is receiving child care or transportation for participation in WEP or UCS, and the amount of transportation or the number of approved child care units will change or if eligibility will end, send a timely notice as described at **Notice of Decision: Child Care Assistance** and **Written Notification to Client, Notice of Decision**.

### *Verifying Hours of Participation*

Continue to require WEP sponsors to complete *Time and Attendance*, form 470-2617, to verify the hours of participation for a given month by the 10<sup>th</sup> calendar day of the next month.

Require unpaid community service work sites to complete *Time and Attendance*, form 470-2617, to verify the hours of participation for a given month by the 10<sup>th</sup> calendar day of the next month.

### *Reporting Hours of Participation*

Report actual hours of participation in WEP or UCS through entry in IWorks by the 20<sup>th</sup> calendar day of the month following the month of participation. WEP and UCS



are listed as separate "services" in IWorks. Enter the hours for each activity under the applicable "service".

When WEP or UCS is combined with another FIA activity, report hours of participation for the other activity in the applicable "service" in IWorks. Do **not** combine the hours from the other activity with the WEP or UCS hours to report under WEP or UCS.

## **Implementation**

### *Maximum Hours of Participation*

For participants beginning participation in WEP or UCS on or after November 3, 2008, limit hours of participation according to the new policy if the WEP/UCS activities are subject to the FLSA.

For participants enrolled in WEP or UCS as of November 3, 2008, determine if the participant's hours of participation need to be adjusted when reviewing the participant's hours of participation and progress for the month of October 2008. Compare the maximum WEP/UCS hours in PJCase for the month of December with current scheduled hours of participation. If needed, adjust the hours of participation for December as described at *Adjusting Hours of Participation in WEP and UCS*.

### *Required Job Search for WEP Participants*

Begin applying the additional flexibility of the revised policy as appropriate on or after November 3, 2008.

### *Verifying Hours of Participation*

For participants beginning UCS on or after November 3, 2008, provide the director (or designee) of the work site with form 470-2617, *Time and Attendance*. Ask the director (or designee) to complete the form to verify hours of participation for each month and return to PROMISE JOBS by the 10<sup>th</sup> calendar day of the next month.

For participants enrolled in UCS as of November 3, 2008, when reviewing the participant's hours of participation and progress for the month of October 2008, provide the director (or designee) of the work site with form 470-2617, *Time and Attendance*. Ask the director (or designee) to begin using the *Time and Attendance* form rather than the *Unpaid Community Service Monthly Report* form to verify the participant's attendance for November and thereafter. Ask the director (or designee) to complete and return the *Time and Attendance* form for each month by the 10<sup>th</sup> calendar day of the next month.

### *Reporting Hours of Participation*

Apply the new policy to hours of participation that occur on or after November 3, 2008.

## **SELF-EMPLOYMENT**

### **Current Policy**

#### *Verifying Self-Employment Hours*

PROMISE JOBS requires self-employed participants to provide verification monthly of:

- ◆ Actual hours of self-employment and,
- ◆ Gross earnings received from self-employment.

PROMISE JOBS conducts a progress review every six months and uses the verification to determine if the participant is making satisfactory progress towards the FIA goal of self-sufficiency. If the verification indicates the participant is not making satisfactory progress, PROMISE JOBS determines if the FIA should be renegotiated to include other activities, or if the participant has chosen an LBP.

#### *Federal Reporting of Self-Employment Hours*

- ◆ PROMISE JOBS enters average weekly hours based upon actual hours of self-employment in IWorks.
- ◆ IWD sends DHS an "employment file" monthly that includes self-employment hours entered by PROMISE JOBS.
- ◆ DHS uses the hours from the "employment file" to complete the federal TANF Data Report.

### **New Policy**

**Legal Reference: 441 IAC 93.109(239B), 93.113(239B), 93.135(239B)**

#### *Verifying Self-Employment Hours*

Beginning November 3, 2008:

Require self-employed participants to verify gross earnings and business expenses received in the last 30 days and actual hours of employment at least once every 6 months. Discontinue requiring participants to verify monthly.

Follow the procedures for verifying hours of employment described in **PROMISE JOBS Memo 163**, dated October 18, 2007. (Note: The procedures for projecting hours of employment do not apply to self-employment. See the new policy for *Federal Reporting of Self-Employment Income* below).

Continue to conduct a progress review every six months and use the verification to determine if the participant is making satisfactory progress towards the FIA goal of self-sufficiency. Only consider the participant's actual hours of participation in self-employment to determine satisfactory progress:

- ◆ If the participant is working 30 or more actual hours per week in self-employment, consider the participant to be meeting FIA requirements.
- ◆ If the participant is working less than 30 hours per week, determine if the FIA should be renegotiated to include other activities, or if the participant has chosen an LBP.

As you review monthly verification of self-employment hours and income, establish a six-month FIA Progress Review. Follow the procedures in **PROMISE JOBS Memo 163**, dated September 9, 2008.

#### *Federal Reporting of Self-Employment Hours*

Federal regulations limit the reported hours of participation for self-employment to the number calculated by dividing the self-employed person's net income (gross income less business expenses) by the federal minimum wage.

The federal Health and Human Services, Administration for Children and Families has advised Iowa to use the same method to determine the net-income for FIP benefits and for calculating self-employment hours for federal reporting purposes.

To comply, Iowa has changed its federal reporting method for self-employment income.

Beginning with the report month of October 2008:

- ◆ DHS will use the net-income entered in ABC by the DHS IM worker for federal reporting purposes.
- ◆ PJCcase will apply the calculation of dividing the net-income by the federal minimum wage to determine hours of self-employment.
- ◆ DHS will not use hours of self-employment entered by PROMISE JOBS in IWorks for federal reporting purposes.
- ◆ DHS will display the hours of self-employment calculated by PJCcase with the Preliminary Work Participation Reports for October participation that will be provided to IWD shortly after November 20<sup>th</sup>.

PJCase displays the calculated hours of self-employment for PROMISE JOBS:

- ◆ Access the self-employed person's *PJCase Person* screen.
- ◆ Select the *Self-Emp Income* button.
- ◆ PJCase will either:
  - Display the Self-Employment Income screen or
  - Give you a message that the person does not have current self-employment or any self-employment history.

The *PJCase Self-Employment Income* screen displays:

- ◆ Referred person's State ID, case number, SSN, and name.
- ◆ Benefit Month = the month that the self-employment income was used to calculate FIP.
- ◆ Amount = the amount of net self-employment income entered by IM for the benefit month.
- ◆ Weekly Hours = the amount divided by the federal minimum wage (\$7.25) and then divided by the number of Fridays in the month. Weekly hours are rounded to the nearest whole hour.
- ◆ Start Date: First working day of the month that the referred person received FIP with self-employment income or IM entered self-employment income.
- ◆ End Date: The last day of the month that FIP ended or IM zeroed out self-employment income.

As you review monthly verification of hours and income for September and received in October, enter the calculated weekly self-employment hours from PJCase into IWorks.

**Important!!** Continue to use actual hours worked in self-employment to determine if a participant is making progress towards self-sufficiency. Do not use the self-employment hours calculated by PJCase to determine progress.

## **EDUCATION**

### **Current Policy:**

#### *Verifying Hours of Participation*

Most participants in approvable postsecondary training and basic education activities provide monthly verification of actual hours of attendance and supervised study time on *Time and Attendance*, form 470-2617, signed by the training provider and the participant.

DHS has clarified that comparable verification cannot be used.

Participants in non-approvable training that is included in the FIA, as it is reasonably expected to lead to self-sufficiency, are not required to provide monthly verification of actual hours of attendance. Instead, participants provide documentation of credit hours upon enrollment for a new term.

PROMISE JOBS does not verify hours of attendance for non-approvable training that is not included in the FIA.

### *Reporting Hours of Participation, Including Study Time*

- *For approved postsecondary training*, PROMISE JOBS assumes that for each hour of class or lab, a student must study two additional hours. To determine weekly hours of participation for reporting purposes, PROMISE JOBS multiplies the number of actual weekly hours by 3.
- *For non-approvable postsecondary training included in the FIA (reasonably expected to lead to self-sufficiency)*, PROMISE JOBS assumes that hours of attendance equate to credit hours. To determine weekly hours of participation for reporting purposes, PROMISE JOBS multiplies the number of anticipated weekly credit hours by 3.
- *For basic education*, PROMISE JOBS enters actual weekly hours of attendance based on the verification.

PROMISE JOBS reports weekly hours of participation through entry in I-Works for all of the above. Hours of participation in non-approvable training that is not included in the FIA is not verified and not reported in I-Works.

Two members of the same household attending the same activity with identical schedules do not need two transportation allowances. However, an academic need for different schedules or child care transportation problems might warrant an allowance for each participant. If parents are able to avoid the need for child care payments by using different schedules, two transportation allowances would be appropriate.

### *Training at the Nearest Facility*

Transportation policy says it is appropriate for PROMISE JOBS to deny a request for training at a distant site if the same program is available at a location closer to the participant's home. However, our administrative rules do not give PROMISE JOBS the authority to deny a training plan for this reason.

## *Federal Reporting Procedures for BA/BS Programs*

Due to interim federal regulations, DHS does not include hours of participation in BA/BS in the federal activity of "Vocational Education", one of the "core" federal activities. As a result, participants in BA/BS programs do not meet federal work participation rates, unless also participating at least 20 hours per week in a "core" activity, such as employment.

### **New Policy:**

**Legal Reference: 441 IAC 93.114(239B), 93.135(239B)**

### *Verifying Hours of Participation*

Require all participants with educational activities included in the FIA to provide monthly verification of actual hours of attendance, including those in non-approvable training and basic education (high school, GED, ABE, and ESL). Verification of credit hours or anticipated hours is not sufficient.

Continue to use *Time and Attendance*, form 470-2617, signed by the training provider, to verify hours of attendance. Providers can use comparable verification as long as:

- ◆ The verification includes all of the elements of *Time and Attendance* and,
- ◆ The provider signs and attaches a *Time and Attendance* form.

**Exception:** If the participant is under age 20 and in high school or GED, the participant can verify the hours by completing and submitting the *PROMISE JOBS Time and Attendance Report* monthly. The training provider or representative does not need to sign the form. PROMISE JOBS needs to contact the training provider (with proper authorization from the participant) if information provided by the participant is questionable.

### *Reporting Hours of Participation, Including Study Time*

**Report actual hours of participation** in class and labs as verified by the provider **for all participants with educational activities included in the FIA**. This applies to basic education activities (high school, GED, ABE, and ESL) and non-approvable training included in the FIA.

### Study Time:

- Report **supervised study time** when verified by the training provider or another appropriate individual on the *Time and Attendance* form, such as a librarian or PROMISE JOBS staff person.
- Report up to one hour of **unsupervised study time** homework for each hour of scheduled class time.
- The total number of hours spent in supervised and unsupervised study may not exceed the number of hours required or advised by the educational program.
- Find out the study time requirements for the program of study from the educational facility and document the appropriate study time requirements in the case file.

### Example One:

Person is taking 3 classes:

- ◆ Two meet 3 hours per week.
- ◆ One meets 5 hours per week.

Total weekly class hours:  $3+3+5=11$ .

#### Total Study Time Limit:

Educational provider says the program requires 2 hours of study time for each hour of class time to maintain good grades.  $2 \times 11 = 22$  hours per week.

#### Supervised study time:

The educational provider verifies 11 hours of supervised study time per week on the *Time and Attendance* form provided by the participant.

#### Unsupervised homework study time:

Up to an additional 11 hours of unsupervised homework study time can be reported:  $22$  hours required for program  $-11$  supervised  $=11$  unsupervised.

### Example Two:

Person has the same class schedule as example one. Total weekly class hours:  $3+3+5=11$ .

#### Total Study Time Limit:

Educational provider says the program requires 1 hour of study time for each hour of class time to maintain good grades, or 11 hours per week.

Supervised study time:

The educational provider verifies 5 hours of supervised study time per week on the *Time and Attendance* form provided by the participant.

Unsupervised homework study time:

Up to an additional 6 hours of unsupervised homework study time can be reported: 11 hours required for program – 5 supervised = 6 unsupervised.

Report weekly hours of attendance as described above through entry in I-Works for all educational activities included in the FIA.

*Training at the Nearest Facility*

When a participant requests training from a particular education facility in Iowa and another facility offers the same program at a location that is closer to the participant's home, approve the training plan if the plan meets the criteria described in the PROMISE JOBS Provider Manual, **POSTSECONDARY TRAINING, Types of Approvable Training**. Do not deny a participant's request for training from a particular education facility in Iowa due to distance or because there is a nearer facility offering the same program as there is not administrative rule support to do so.

Consider all circumstances when helping the participant decide which educational facility to attend when there is more than one option for a particular program. Encourage the participant to take the training at the nearest facility unless taking the training at the farther facility will allow the participant to reach self-sufficiency at an earlier date or there are other reasons, such as access to child care, that would justify the participant's attendance at the farther facility.

Authorize child care and transportation to the farther facility when the reason for attending the farther facility is within PROMISE JOBS program goals. Limit child care and transportation assistance to the amount that would be required to attend the nearest facility when the participant chooses to enroll at the farther facility for a reason that is not within PROMISE JOBS program goals.

For example, a participant who wants training as a licensed practical nurse can enroll in the training at a facility near the participant's home, however the program has a waiting list. The participant can enroll immediately in the program at a facility that is farther away. The participant's enrollment at the farther facility is within PROMISE JOBS program goals as the participant may reach self-sufficiency at an earlier date. PROMISE JOBS can provide any additional child care and transportation assistance needed for the participant to attend the farther facility.



## *Federal Reporting Procedures for BA/BS Programs*

Final federal regulations allow states to include hours of participation in BA/BS in the federal activity of "Vocational Education".

With the report month of October 2008, DHS will again report hours of participation in BA/BS degrees in the federal activity of "Vocational Education".

### **Implementation**

#### *Verifying Hours of Participation*

*For non-approved postsecondary training included in the FIA, require the participant to begin providing monthly verification on form 470-2617, Time and Attendance, for October 2008:*

- Contact the participant to renegotiate the FIA to include the new verification requirement. The participant needs to provide verification of actual hours of participation for the month of October in November 2008.
- Schedule an appointment that does not conflict with the participant's training schedule, or negotiate a new FIA over the phone and mail the FIA to the participant for signature. Provide the participant with an adequate supply of *Time and Attendance* forms.

#### *Reporting Hours of Participation, Including Study Time*

With hours of participation in all educational activities that occur on or after October 1, 2008, report hours of participation, including study time, as described above.

#### *Training at the Nearest Facility*

As of November 3, 2008, do not deny a participant's request for training from a particular education facility in Iowa due to distance or because there is a nearer facility offering the same program as there is not administrative rule support to do so.

If you have denied a participant's request for training from a particular education facility in Iowa due to distance or because there is a nearer facility offering the same program, schedule the participant to discuss the participant's request for training and renegotiation of the FIA as soon as possible. Consider the decision to deny the training for this reason to be invalid.

Determine if the participant's training plan meets the criteria described in the PROMISE JOBS Provider Manual, **POSTSECONDARY TRAINING, Types of Approvable Training** or **Nonapprovable Training**. Approve or deny the training plan accordingly. Do not consider that the training is not provided at the nearest facility when making this decision. Renegotiate the FIA if needed.

If the participant's training plan is approvable, consider the participant's reasons for attending the farther facility to determine if child care and transportation assistance should be limited to the amount needed to attend the nearest facility as described above.

*Federal Reporting Procedures for BA/BS Programs*

This is for your information only. No action is required.