



Distance Learning Can Help Low-Income Parents Attend School: TANF Agencies Should Adopt Supportive Policies

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As the number of people with access to computers and the Internet grows, distance learning is becoming an increasingly popular way to attend school. Distance learning programs are particularly attractive to many nontraditional students, including low-income parents, who often must fit their classes around work and family responsibilities.

However, in the wake of the interim rules implementing the Deficit Reduction Act of 2005 (DRA), several states expressed concerns about whether it was possible for distance learning programs to meet the work verification requirements established by the US Department of Health and Human Services (HHS) under the Temporary Assistance for Needy Families (TANF) program. On February 5, 2008, in the final rule implementing the DRA changes, HHS explicitly said that states can count distance learning coursework as a work activity under the vocational educational training classification.¹ Indeed, states have always had the ability to count distance learning hours. Prior to issuing the final rule, HHS had already approved many work verification plans that include distance learning as a countable work activity.

Because states must follow the definitions of work activities included in their work verification plans, some states may be denying TANF recipients access to distance learning programs. Other states may be imposing unnecessary obstacles to participation, such as requiring students to use computer labs where their physical presence can be monitored. This paper identifies language from *HHS-approved* work verification plans that other states can adopt in order to maximize access to distance learning and raise work participation rates. It also highlights some restrictive and burdensome language that should be dropped from work verification plans.

¹ 73 *Federal Register* 6772-6828.

Why distance learning?

Distance learning is formal training (as opposed to self-study) during which the student is not in the same physical location as the instructor. Most often, the student uses a computer and course software to participate in class. With Internet access, students can have direct interaction with teachers and other students. Classes can be taught either entirely by distance learning, or through a combination of in-person and remote activities.

Distance learning programs have the potential to raise state participation rates and improve access to education and training, which in turn increase participant's earnings and employment rates.

Distance learning programs have become popular, in part because they are a better fit for non-traditional students' schedules. Kentucky data indicate that more than 30 percent of the students enrolled in the state's Ready to Work program in Fall 2006 (prior to the DRA rules taking effect) took a class that was at least partially online.² Adults who work and have families may not have the opportunity to take classes on-campus at a set time, but could participate at home or work at their convenience. Use of distance learning can also cut down on long commute times, which cannot be claimed as hours of participation under HHS guidelines.

Distance learning could also boost TANF work participation rates. While the national work participation rate in FY 2006 (the most recent year for which data are available) was just 32.5 percent, many more recipients participated in work activities, but for too few hours to count toward the participation rate. Many of these individuals were in unsubsidized jobs, and more hours of work were not available to them. By connecting these individuals to education and training activities, states could increase their participation rates significantly. Because these individuals must schedule their hours of participation around their work hours (which often shift from week to week), they may not have the ability to attend a regularly scheduled class, but might be able to participate in a distance learning course.

While distance learning is not for everyone, it can be a valuable educational activity for those who have the literacy and computer skills to participate. A Texas TANF Workforce Commission study found that students in a distance learning program were three times more likely to gain employment in the first quarter after they had left the program, and earned an average of \$1,118 per quarter more than TANF clients in other programs.³ Low-income single mothers increased their earnings by 14 percent after participating in a New Jersey program that

² Personal communication with Shauna King-Simms, director of College and Career Transitions, Kentucky Community and Technical College System.

³ Texas Workforce Commission, "Major Projects at a Glance," October/November 2004, available at http://www.itwd.rutgers.edu/PDF/MajorProjectsGlanceOctNov_04.pdf.

loaned them laptop computers with Internet access.⁴ For states looking to improve the productivity of their workforce and increase earnings of people near the bottom of the income ladder, distance learning programs are a worthy investment.

Monitoring of participation in distance learning

Some states have expressed concerns that they will not be able to monitor participation in distance learning to the level required by HHS. However, HHS has approved several states' work verification plans that include specific references to distance learning. A number of these (in California, Hawaii, Massachusetts, Montana, South Carolina, Oregon, Louisiana, Florida) state that they will monitor distance learning participation by giving providers the responsibility to keep track of participation hours and progress reports.

Most distance learning systems include the capacity to record the hours that a participant has logged online. There are many different types of distance learning monitoring systems, and states can design a system that addresses their concerns about client participation.⁵ The provider itself can verify that the registered student is the one completing the coursework both through instructor reports and through demonstrated mastery of the course material. Electronic systems also reduce the paperwork burden on state agencies, participants, and instructors. While some states have been uncertain whether this approach meets HHS standards, HHS has approved work verification plans (Washington, Hawaii, Massachusetts, Pennsylvania, Montana, Oregon, Massachusetts, South Carolina) that incorporate this approach.

Hawaii's plan was typical:

In cases where the WEI [participant] is participating in a distance learning program, via Internet or video conferencing, the Department will accept the documentation issued by the distance learning institution verifying that the student attended the sessions. It may include the attendance records or log-in and log-out records available on-line or in an electronic format.⁶

It is also worth noting that under the new final rule, students enrolled in distance learning programs can, like their peers in traditional courses, receive credit for one hour of *unsupervised* homework time for each hour of classroom participation. Thus, a student who participates in five hours a week of online courses may receive credit for five hours a week of unsupervised offline homework, such as reading or working on an essay. In addition, online study halls could be used to provide supervision for additional hours outside of class time for students in both

⁴ Mary Gatta, "Findings From the Field: Early Findings of the New Jersey Online Learning Project for Single Working-Poor Mothers," December 2003, available at <http://www.itwd.rutgers.edu/PDF/FindingsfromField.pdf>.

⁵ For more details about course monitoring software and what it is capable of, see "Distance Learning for Workforce Development, Tracking: What happens on the Computers in Participant Homes," available online at http://www.itwd.rutgers.edu/PDF/Best%20Practices_%20Tracking.pdf.

⁶ TANF Work Verification Plan: State of Hawaii. 19. September 4, 2007, available at http://www.acf.hhs.gov/programs/ofa/verification/wvp/15_092507.pdf.

online and traditional courses, up to the number of hours expected of students by the educational institution.

Unnecessary restrictions limit access to distance learning

Some states' work verification plans impose excessive supervisory standards and unnecessarily limit access to distance learning programs. Some plans only count distance learning if unusual conditions pertain. Both Pennsylvania and Washington participants do not count distance learning if the same coursework is being offered at a local college campus. South Carolina only allows 10 hours of distance learning-based vocational education per week, with some exceptions. These limitations are not required to obtain HHS approval, and unnecessarily limit recipients' options.

Excessive supervisory standards are also included in some state plans and in local settings. The Texas plan explicitly requires that distance learning be monitored in person. TANF participants in Port Townsend, Washington must take distance learning classes at a supervised study center.⁷ And South Carolina's plan exceeds the supervisory standards that apply to students in traditional classes, directing caseworkers to check whether participants are completing homework on time.

Mechanisms for verifying and documenting actual hours of supervised participation may include online tracking of time participating in the educational activity, combined with intermittent review of work assigned to and completed by the student or reasonable approximations of the time required to complete work packets as determined by the education provider and approved by DSS. Detailed records of the instruction provided, dates when student packets were sent out and received, performance on the assigned work as well as the assignments completed by all students on the roster must be maintained.⁸

High standards may be the result of concerns that monitoring software will inadequately document a participant's coursework. Yet states and businesses have installed course monitoring systems that they believe document participation. These systems record the hours that a participant logs in and off the course software, much as an instructor would when they take attendance in class.⁹ If states are concerned that students are not paying enough attention while logged on, it should be reassuring that distance learning programs are still subject to the same documentation standards as other classes.

Furthermore, these standards may discourage or prevent students from taking vocational education courses. Distance learning that must be supervised in person seems to run contrary to its purpose of ensuring that training is provided in a flexible and convenient format. Burdensome

⁷US Department of Health and Human Services, "Welfare Peer Technical Assistance Network: Interactive Q & A," available online at <http://www.peerta.acf.hhs.gov/qa/responses.cfm?comID=48#1388>.

⁸ South Carolina TANF Work Verification Plan. 22. August 14, 2007, available at http://www.acf.hhs.gov/programs/ofa/verification/wvp/45_091207.pdf.

⁹ Kimberly Bunting, "Distance Learning for Workforce Development, Tracking: What Happens on the Computers in Participant Homes," available at http://www.itwd.rutgers.edu/PDF/Best%20Practices_%20Tracking.pdf.

reporting may discourage students and will create additional obligations for state governments, which must expend limited resources to keep track of monitoring documentation.

Conclusion

Distance learning can be an important means for TANF clients to get the skills they need to enter or move up in the workforce. For clients who are already juggling work and caring for their families, distance learning can be the difference between succeeding in an educational opportunity or failing. For clients who live in remote places where taking classes on-campus was never an option, or who could not afford the transportation costs to and from a campus, distance learning opens new doors. Allowing TANF recipients to engage in distance learning helps them achieve their educational goals and enables states to meet the participation rate requirements.

Now that HHS has clarified the rules regarding distance learning, states should not be uncertain about whether it is acceptable to help TANF participants take these classes. States that have led the way with less burdensome and restrictive plans provide positive examples that can be adopted by states that want to make distance learning a larger part of their TANF program.