IMPLEMENTATION TIPS:
Reporting and Counting Hours

Now that your program is not meeting in person, you may wish to figure out how to capture the hours learners spend learning online. This is especially important for WIOA Title II funded programs, though OCTAE has said that it will not penalize programs for reduced enrollment during the COVID 19 crisis. Nevertheless, **consider this time of rapidly expanding distance education programming an impetus to figure out how you might monitor and report student effort and progress.**

The National Reporting System defines Distance Education as follows:

Formal learning activity where students and instructors are separated by geography, time, or both for the majority of the instructional period. Distance learning materials are delivered through a variety of media, including but not limited to, print, audio recording, videotape, broadcasts, computer software, Web-based programs, and other online technology. Teachers support distance learners through communication by mail, telephone, e-mail, or online technologies and software. (NRS TA Guide, 2019. See section titled Program Enrollment Type)

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NRS allows states to use "Proxy Contact Hours (PCHs)", time spent learning at a distance, as a measure of time between post tests that qualify for Measurable Skill Gain. Learners who study at a distance must have 12 hours contact with the program before they can be counted for Federal reporting purposes. This "contact" need not be in person; "...actual contact and contact through telephone, video, teleconference, or online communication, where participant and program staff can interact and through which participant identity is verifiable" are all allowed (*NRS TA Guide, 2019*. See section titled Measuring Contact Hours for Participants in Distance Education) .

Reporting of Proxy Contact Hours

Usually if a state wants to measure and report PCHs for distance learners it must develop a distance education policy that includes: allowed curricula; the way PCHs will be counted for the curricula, and the actual hours assigned. During the COVID19 crisis, OCTAE will allow all states to implement distance education and count time - even if they do not yet have a distance education policy.

So, how are PCHs counted? There are three approved models:
- Clock Time Model: "assigns contact hours based on the elapsed time that a participant is connected to, or engaged in, an online or stand-alone software program that tracks time"
- Teacher Verification Model: "assigns a fixed number of hours of credit for each assignment based on teacher determination of the extent to which a participant engaged in, or completed, the assignment"
- Learner Mastery Model: "assigns a fixed number of hours of credit based on the participant passing a test on the content of each lesson. … A high percentage of correct answers (typically 70%–80%) earns the credit hours attached to the material.

Proxy Contact Hours for Teacher Created Curricula

Because programs may not have access to licensed curriculum provided by publishers or software developers, they may be asking teachers to create their own learning materials. There are ways to go about this that will lead to the possibility of eventually reporting PHC in NRS tables. We'll share practice in two states that are leading the way in this work.

New Hampshire allows teachers to decide on a fixed number of instructional hours for assignments that they create. Using teacher created instructional materials or resources from publishers, teachers craft lessons and assign time based on their past experiences with students completing the same or similar tasks in the classroom. These distance learning assignments might be in paper or digital form. When students return the work, teachers evaluate and provide feedback to the student and assess whether the student completed the assignment sufficiently. Time is then recorded in the state data management system. Sometimes teachers have students work with more open-ended self practice websites that do not track time on task. In these situations, hours can still be tracked by goal setting with students ahead of time, choosing a paper or electronic tracking method for the student to self-report time on task and learning activities completed. Then the teacher will assess the goal/tracking form to determine if the student completed the assignment sufficiently and will record hours.

One teacher in New Hampshire, Tiffany Brand, creates lessons in HyperDocs housed on her class web site. These HyperDoc lessons mirror her face to face in-class lessons, with video recordings providing the lesson content rather than direct instruction. Students watch the videos while completing guided notes documents to facilitate engagement. Then they complete the same assignments that face to face students would complete and submit them electronically. Tiffany then assesses the guided notes and assignments, provides feedback to the students, and assigns PCHs if the assignments are completed sufficiently.

In Arizona, instructors who have passed a required Teacher Verification Model training may use curricula that instructors themselves have created. The training is available online as a self-paced course created by state staff. Teachers earn 4 hours of professional development credit after successful completion. As a capstone for the course, teachers submit an actual Resource Evaluation Form that gets evaluated (sometimes resubmission is necessary). Once the form is completed satisfactorily, teachers are instructed to use the same level of detail for future submissions (which do not require a formal evaluation, desk monitoring is done on them). Teachers use their professional judgment and prior experience to determine the time required for students, on average, to complete assigned online work (if the assigned work does not have its own means to track time). The estimated hours to complete the assigned work will be recorded as PCHs in the state data management system. Instructors need to be able to prove they have completed the required training (via a certificate of completion) and submit a resource evaluation form for the specific digital resource(s) assigned to the student(s). The evaluation must be kept on file for a minimum of 5 years. In addition to creating their own, teachers may select from existing resource evaluations via a search tool that shows state-wide submissions.

One teacher in Arizona, Kate Redmon, creates courses using Canvas. Kate brings in relevant learning resources from sites like Khan Academy and YouTube and materials that she created herself. By using Canvas and these free resources, Kate is able to personalize learning - providing supplemental learning to complement the online learning curriculum that the State of Arizona provides for all programs. Before TVM, none of the time spent completing the personalized learning material was counted by her program, Yavapai College ABE/ASE. Read more about how Kate structures her courses and documents activity completion in this EdTechCenter Blog post.

Actually Tracking the Hours

You will need to have a means of recording the hours that you track. Programs might choose to create shared Google Sheets that list learners, learning activities, and hours awarded. Here's a copy of the spreadsheet that the Texas Workforce Commission is asking Texas ABE programs to use. Some states have affordances for this built into their database systems - where teachers can directly log these hours.

OTHER USEFUL RESOURCES

- EdTech Center@ World Education - **Essential Tips for Starting Distance Learning**
- EdTech Center@World Education - **Instruction and Assessment Blog post**
- NRS - **Technical Assistance Guide for Performance Accountability under the WIOA**
- Program Memorandum OCTAE 20-3 - **Adult Education and Family Literacy Act and COVID-19 FAQ**
- EdTech Center Blog by Kate Redmon - **Enriching Distance Learning through TVM**