



Statewide Email

DATE SENT: 04/01/2020

FROM: Carrie E. Henderson, Ph.D.

TO: Council on Instructional Affairs
Council on Workforce Education

Via: FCS Listserves

SUBJECT: Two Important COVID-19 Updates

The Florida Department of Education released [DOE Order No. 2020-EO-01](#) and the attached frequently asked questions (FAQ) document to provide Florida College System institutions and school district career centers with additional guidance and information related to institutional responses to COVID-19. FLDOE has received a few questions that are directly addressed in the FAQ document, and we encourage you to continue to ask questions, as guidance and assistance in additional areas will be forthcoming. We are providing the following to call your attention to specific items, and encourage you to review both documents in entirety.

In particular, we want to draw your attention to:

- FAQ Q3 regarding dual enrollment articulation agreements. Recognizing districts and institutions may need flexibility in serving dual enrollment students, existing dual enrollment articulation agreements and associated policies may need to be modified. Because these are local agreements, districts and institutions should collaborate on any necessary modifications.
- FAQ Q4 regarding the deadline for career pathways articulation agreements being extended to June 30, 2020.
- FAQ Q6 regarding when the standard-setting process for the Next Generation ACCUPLACER assessment will take place. Colleges may continue to use the interim passing scores in State Board of Education Rule 6A-10.0315, F.A.C., for placement purposes.
- FAQ Q7 regarding instructional delivery modality reporting. Colleges should continue to report course instructional delivery method based on how the course was intended to be delivered at the beginning of the winter/spring 2020 term.
- FAQ Q8 regarding modifications to 2019-2020 academic calendars. Colleges have the discretion to modify Department-approved 2019-2020 academic calendars if such modifications would assist the institution in better meeting the needs of students. The division will be surveying colleges for catalog adjustments to academic calendars.

- FAQ Q9 regarding the deadlines for 2020-2021 academic calendars being extended to June 30, 2020. Additionally, if an institution has already submitted its academic calendar for the 2020-2021 year and changes need to be made, an updated version of the calendar can be resubmitted with the modified dates using this [survey link](#).
- FAQ Q10 regarding the 45-day posting requirement of textbooks and materials. This FAQ offers guidance on how FCS institutions may proceed with the posting requirement.
- FAQ Q11 regarding planning for commencement ceremonies. Institutions should adhere to the CDC's guidelines for mass gatherings and community events, and monitor updates from the CDC, the Florida Department of Health, and other authorities.
- FAQ Q14 regarding circumstances under which students and staff should return to campuses.
- FAQ Q20 regarding deadlines for the career and technical education audit being extended to June 30, 2020.

We hope this information is helpful as your college continues to support students during this time. We recommend that you visit <http://www.fldoe.org/em-response/> for updated information and resources.

Thanks,
Carrie

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Carrie E. Henderson, Ph.D.

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Florida Department of Education (FDOE) Q&A Guidance

The purpose of this Q&A document is to provide additional information and clarification regarding the Department's guidance to school districts and Florida College System (FCS) institutions with career, technical, and adult education programs related to COVID-19 closures. This guidance is aimed to ensure all Florida students have the opportunity to continue their education as we work together to mitigate the spread of COVID-19.

Florida College System

1. Q: What kinds of operational and learning support functions are permissible for the remainder of the spring 2020 semester as colleges transition to remote learning?

A: Florida College System institutions are strongly recommended to deploy all available resources to operate virtually or through distance learning for the remainder of the 2020 spring semester. Institutions should adhere to [the CDC's guidelines for mass gatherings and community events](#) when continuing operations that support remote student learning, including delivery of educational and student services and resources.

2. Q: Are District Boards of Trustees allowed to meet virtually or telephonically during this term?

A: Yes. [Executive Order 20-69](#) authorizes local governmental bodies to meet virtually, including video conferencing or via telephone. The order also suspends any statute that requires a quorum to be present in person and suspends any statute requiring a meeting to be held at a specific location in order to conduct business. However, all other requirements for public meetings, as found in [chapter 286](#), which include the ability of the public to access and participate in public meetings, must be followed.

Through June 30, 2020, District Boards of Trustees are encouraged to meet virtually when the college president, in consultation with the board chair, determines such meeting to be in the best interests of education and the public. The public must be given notice of any such meetings through colleges' websites, along with other reasonable means, to advise the public of the time, purpose, and the method by which the meeting is conducted. The public can monitor and participate remotely via web cast, text, email, telephone, or other means.

3. Q: May colleges and districts modify existing terms of dual enrollment agreements if such modifications assist the parties in better meeting the needs of dual enrollment students?

A: Yes. Dual enrollment articulation agreements are local agreements, and colleges and districts should work together to support student learning and course completion during this time. The

Department will not request the submission of 2020-2021 agreements until the regular submission deadline in August 2020.

4. Q: Will the deadline in section 1007.233, Florida Statutes, be extended for colleges and career centers to submit their Regional Career Pathways Agreements?

A: Yes. The May 1, 2020, deadline to submit career pathways agreements has been extended until June 30, 2020. Instructions for submitting these agreements will be provided no later than April 10, 2020.

5. Q: Will the deadline in section 1012.86(2)(a), Florida Statutes, be extended for colleges to submit their Employment Equity Accountability Program Report?

A: The specific deadline in this statute for each college to submit its Employment Equity Accountability Program Report remains May 1, 2020. The deadline for colleges to submit the remaining components of the College Annual Equity Update has been extended to June 30, 2020.

6. Q: When will the standard-setting process for the ACCUPLACER assessment take place?

A: The State Board of Education approved revisions to Rule 6A-10.0315, F.A.C., on August 21, 2019. The impetus for this rule revision was the College Board's creation of the Next-generation ACCUPLACER, which replaced the Classic ACCUPLACER. The standard-setting process for ACCUPLACER has been postponed until fall 2020. Colleges may continue to use the interim passing scores in State Board of Education Rule 6A-10.0315, F.A.C., for placement purposes. More information regarding the standard-setting process will be provided at a later date.

7. Q: Will colleges be required to change their reporting of course sections' instructional delivery methods due to the transition to distance learning?

A: Colleges should continue to report course instructional delivery methods based on how the course was *intended* to be delivered at the *beginning* of the spring 2020 semester.

8. Q: Are colleges permitted to modify their 2019-2020 approved academic calendars?

A: Colleges have the discretion to modify Department-approved 2019-2020 academic calendars, if the modifications would assist the institution in better meeting the needs of students.

9. Q: Will the deadline be extended for colleges to submit 2020-21 academic calendars?

A: Yes. The deadline for each college to submit a 2020-21 academic calendar has been extended from May 15, 2020, until June 30, 2020. Colleges that submitted academic calendars early may resubmit if the dates have changed.

10. Q: Is there guidance for colleges around the 45-day posting requirement for textbooks and instructional materials found in section 1004.085(5), Florida Statutes, for course sections that are migrating from a face-to-face to online format?

A: Colleges should make every effort to comply with the 45-day posting requirement. In cases where posting before the 45-day window is not feasible, colleges should post the textbooks and instructional materials as soon as possible so that students know the costs relating to their materials.

11. Q: Are colleges permitted to hold commencement ceremonies as scheduled for the spring 2020 term?

A: Institutions should adhere to the [CDC's guidelines for mass gatherings and community events](#), and monitor updates from the CDC, the Florida Department of Health and local authorities. Some colleges have already preemptively canceled, rescheduled or are exploring virtual options for commencement ceremonies out of an abundance of caution.

12. Q: How can colleges ensure their instructional continuity plans and modality adjustments comply with SACSCOC guidelines?

A: Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) has a website for guidance on institutional responses to COVID-19: <https://sacscoc.org/coronavirus-and-the-commission/>.

All Postsecondary Career, Technical, and Adult Education Programs

General Questions

13. Q: What does it mean for school districts and their technical colleges and centers to be closed until May 1st?

A: The Florida Department of Education is reviewing recommended guidance every 15 days pursuant to [CDC guidelines](#). School district technical colleges and career centers are recommended to operate virtually or through distance learning means to implement the continuity of instruction plan. As we approach May 1st, additional guidance will be provided. Directors are encouraged to be in close contact with their respective superintendent's office about any local decisions that may be in effect.

14. Q: Are there any circumstances under which students may return to a technical college or FCS campus while campuses are closed in response to COVID-19?

A: Yes, based on [current CDC guidelines](#), as long as groups are limited to 10 or fewer people, including the educator, in a single occupied space. Space must allow for the appropriate social distancing. This includes taking an assessment, an industry certification, or engaging in a practicum related to specific CTE course requirements, and/or assessments related to adult education. **Note:** Your county leadership and local community may have additional restrictions. Please consult all appropriate entities to ensure compliance with local requirements.

15. Q: Are you aware of any free resources and training that are available to provide assistance or guidance on the transition from face-to-face instruction to online?

A: The Florida Association for Career and Technical Education (FACTE) has established resource repositories through Google drive to share information for both secondary CTE and all postsecondary CTE partners, including FCS institutions. You do not need a Google account to access these sites. They may be accessed as follows:

K-12 Secondary CTE Information:

<https://drive.google.com/open?id=1ZvWC8vCwPkuo1Wu5sGJcNDfhchJ5Vn7M>

District Postsecondary and FCS CTE Information:

<https://drive.google.com/open?id=1nMp6vozvHDka59NmTRRehvhYw4xZ-XU2>

16. Q: As our programs move online, how do we address access for students who do not have internet access or devices at home?

A: Many internet providers are providing free internet access and hotspots as a result of school campus closures. Districts and FCS institutions should include procedures in their instructional/academic continuity plans that assist with the transition to online or distance learning for individuals without access to computers or internet service.

Additional resources can be found on the FDOE website at <http://cdn.FDOE.org/em-response/resources-families.stml>

Note: You may use federal grant funds to support distance education. If you need to make a change to your grant budget, please contact your grant manager to file a budget amendment. These requests will be expedited.

Clinical and Other Program Specific Requirements

17. Q: Many of our health science programs require clinical hours for program completion (practical nursing, CNA, etc.). What guidance is being provided through the Board of Nursing (BON) or through the Department to assist in modifications to these requirements? Is the use of simulation authorized to meet these requirements?

A: The Department of Health has issued [Emergency Order 20-003](#), which allows remote simulation of nursing clinicals, "...with the approval of the dean/program director/program chair/program coordinator, substitute supervised remote live video-conferencing for didactic hours and simulation for all supervised clinical instruction hours required by any statute or rule."

The BON has noticed a meeting for April 2 at 1:30 pm (Eastern) and additional information may be found at <https://floridasnursing.gov/meeting-information/upcoming-meetings>.

In addition, the Department of Health issued [Emergency Order 20-002 - FLHealthSource](#), on March 16, 2020, which addresses Emergency Management Services (EMS) programs such as EMT (emergency medical technician) and Paramedic.

Questions can be directed to Rickey Stone, EMS Operations Administrator, Bureau of Emergency Medical Oversight at the Florida Department of Health, by phone at 850-245-4704 or via email at rickey.stone@flhealth.gov.

Aviation Program-Specific Requirements

18. Q: Is there flexibility for distance learning to be utilized in aviation programs?

A: Yes. Generally, ground school instruction (private pilot, commercial pilot, instruments) require face-to-face instruction under Federal Aviation Administration (FAA) Part 141 (title 14) regulations. The FAA has been contacted and does have an option, see: [Guidance Related to](#)

[COVID-19](#). This option can be approved by the local FAA representative and allows aviation programs to continue instruction for ground school through online instruction.

FAA approval requires submission of the following:

- A detailed description of the distance learning technology to be utilized;
- Description as to how the distance learning program would be administered;
- Procedures to ensure the distance learning course records are kept in compliance with the approved curriculum; and
- 141 Part schools must establish a time frame for the distance learning delivery.

If you have any difficulty or questions, please contact the state education supervisor for the aviation career cluster, Bob Blevins at robert.blevins@fldoe.org.

CTE Program Basic Skills Requirements

19. Q: Can the FDOE waive basic skills testing requirements in Rule 6A-10.040, F.A.C. for students in clock hour programs of 450 hours or more?

A: For the 2019-20 school year, programs are authorized to assess basic skills by any reasonable means and are not limited to the assessments listed in [Rule 6A-10.040, F.A.C.](#) or bound by the time limits set forth in order to exit a student who meets all other criteria for completion of a clock hour certificate program that is 450 hours or greater.

CTE Audit Deadlines

20. Q: Will there be an extension of deadlines associated with the CTE audit?

A: Yes. The deadline for colleges, school districts, and district technical colleges/centers to submit CTE Audit Program Status Templates and Track B Market Demand Templates has been extended from April 15, 2020, to June 30, 2020.

Federal Grants – Perkins and WIOA-Adult Education

21. Q: Will the release of the grant requests for proposals (RFPs) for Workforce Innovation and Opportunity Act (WIOA)-Adult Education and requests for applications (RFAs) for Perkins V be delayed?

A: The Department is evaluating all deadlines for grant applications and proposals for federal and state funds. Most Perkins grant applications are entitlement programs that will require an RFA. An eligible recipient for 2020-2021 Perkins V funds must submit their application no later than June 30, 2020, in order to have a project award date of July 1, 2020. The Department will release the proposals in accordance with competitive procurement guidelines for Perkins V grants and WIOA-Adult Education grants that require an RFP.

22. Q: Are provisions being made for the enrollment targets in our WIOA-Adult Education grants since this will significantly impact our ability to accept new students? Do you anticipate the waiver request letter due March 20, 2020, will also have an extension?

A: The Department will be modifying the process for the waiver of 2018-19 and 2019-20 fiscal performance requirements which are based on adult education enrollment targets set by your agency. A streamlined process will be released to request a waiver of the 2018-19 and 2019-20 Enrollment Target requirements for these grants.

When notified, your agency will submit a one-page waiver form to your designated grant manager:

- Request a waiver for 2018-19 and 2019-20; and,
- Describe how your agency will be using federal grant funds to provide support services to students and transition to distance learning modalities for the current fiscal year.

23. Q: Do you foresee any changes to the deadlines for current year (2019-2020) Perkins and Adult Education grant deadlines?

A: Agencies may contact their grant managers until September 1, 2020 to request a no-cost extension of their grant award. Funds must be obligated, liquidated, and the final disbursement reports must be submitted by September 21, 2020.

Note: Agencies *must* request the no-cost extension for each project number, and a new FDOE 200 Award Notification Letter will be issued with the new date of September 1, 2020. Please submit your request via email to your DOE program manager.

Financial Aid

24. Q: Has the Department of Veterans Affairs (DVA) relaxed any guidelines for financial aid?

A: Congress just passed [S. 3503](#). The bill gives the DVA the authority to continue GI Bill payments uninterrupted in the event of national emergencies. The new law allows the VA to pay education benefits to veteran students whose programs have changed from resident training to online training. Student veterans will continue to receive the same monthly housing allowance payments received for resident training until December 21, 2020 or until the school resumes normal operations of resident training. The VA is working to immediately implement the new changes. If you have questions about specific circumstances, please contact the U.S. Department of Veterans Affairs Education Call Center at: 1-888-442-4551 between 8 AM and 7 PM Eastern Time, Monday-Friday.

25. Q: Where can I find the “relaxed” guidelines for CTE online delivery as it relates to financial aid? Do you think the Federal USDOE waiver for online will be extended?

A: The Department consulted with the USDOE Office Federal Financial Aid regarding the potential effect of campus closures on students enrolled in clock hour certificate programs. We were provided the following guidance:

- Institutions that have robust learning management systems that are capable of delivering the content required for successful acquisition of the technical skills required for the clock hour program may do so on a temporary basis.
- Institutions may be required to provide evidence of student engagement or participation in the learning management system.

- Online participation or engagement need not be accounted for by synchronous measures.
- This guidance may not apply to licensure programs if the licensure body does not accept distance learning modalities.

In addition, the USDOE is working on blended/hybrid learning regulations that intend to address issues related to distance learning delivery of clock hour instructional programs. FDOE will notify you when public comment is available for the negotiated rule.

Council on Occupational Education (COE) requirements for Distance Learning (for Technical Colleges Only)

26. Q: What process must districts follow to transition programs or courses to online offerings? Do we need a letter of approval from the Council on Occupational Education (COE) to offer courses through distance learning or online?

A: The Department contacted COE last week and below is a summary of information provided:

As stated in the [March 5th memorandum](#), the US Department of Education (ED) has permitted the recognized accrediting organizations to waive distance education (DE) review requirements for institutions working to accommodate students whose enrollment is otherwise interrupted as a result of the COVID-19 virus. This waiver is for students who were already in attendance at the institution as of March 5, 2020. It is not intended for use by students who have yet to enroll at your institutions. (For institutions that wish to seek approval for distance education delivery on a permanent basis, the standard COE approval process will be required.) One other thing to note: as mentioned in the ED memorandum, the waiver of accreditation requirements to allow immediate student access to distance education options is not available for clock-hour programs that lead to licensure if the licensure body will not accept distance education courses or hours or give credit for them toward the number of hours a student must complete. Please check with your state board(s) to determine if distance education is a viable option for your students preparing to sit for state licensure exams.

Friday, March 20, the USDOE indicated the temporary approval for distance education is now valid for students who are enrolled or will be enrolled in affected programs during payment periods that start “on or before June 1, 2020.” It is important to note that the temporary distance education approval letter from COE does not have a specific expiration date. Over the next few weeks, should the Department consider further revisions to their original memorandum the Council will comply with the Department’s latest considerations. Please bear in mind, however, that the Department’s original memorandum does state that these allowances (that is, special accreditation approvals for temporary distance education) are designed to cover the period when schools may be closed due to concerns about the spread of COVID-19. If a school is interested in permanent distance education options for its programs, it may use the Council’s standard distance education approval process.

Online Offerings/Transition to Online for CTE Programs

27. Q: Can we transition students to online/hybrid instruction without updating the modality information?

A: Yes. Courses that did not begin the term as distance learning should not update the instructional delivery method in data reporting.

28. Q: Can any rules that do not permit online or hybrid in CTE instruction be waived?

A: The Department does not have any rules regarding permission to offer online or hybrid CTE instruction. Licensed or regulated programs may have requirements. In addition, question #26 above regarding COE accreditation requirements.

29. Q: Are funds available for a special allocation of adult and postsecondary education technology costs to get online?

A: You may use federal Perkins grant funds to support distance education solutions for CTE programs and WIOA Title II Adult Education and Family Literacy grant funds to support distance education solutions for adult education. If you need to make a change to your grant budget, please contact your grant manager to file a budget amendment. These requests will be expedited.

Adult Education Online

30. Q: We have an adult high school program where we utilize an online platform for curriculum delivery. If we are able to get a distance/online plan together, is there anything that would keep us from starting earlier than March 30, 2020?

A: No. You may transition to online at any time.

31. Q: Can we enroll new students in an online program, even if they have not been pre-tested for placement?

A: Yes. [Rule 6A-6.014 \(4\)\(a\)1, F.A.C.](#) has been waived, allowing you to enroll students in adult education without pre-testing. Agencies will have to use local discretion on which programs to enroll students. As soon as testing becomes available, agencies will need to pre-test students to determine an appropriate initial educational functioning level with which to report the student.

32. Q: Is prior content authorization necessary or, given the circumstances, is a move toward distance education acceptable for students who have the technology support/literacy to continue with their coursework?

A: No. Prior authorization from FDOE to change instructional delivery methods is not required.

Adult High School

33. Q: Does the waiver of state assessments (FSA, EOCs) apply to adult high school as well?

A: Yes. This waiver only applies to students currently enrolled in adult high school during the 2019-2020 school year. If an individual in adult high school meets all other credit requirements at the end of this semester, the student may qualify for an adult high school diploma without passing the required state assessments.

34. Q: Does the waiver of state testing requirements (FSA, EOC) apply to students who left without obtaining a diploma or passing required exams?

A: No. The waiver only applies to currently enrolled students.

Reporting Data/Performance

35. Q: Is the Department extending survey update periods to allow extra time to test students and report data?

A: At this time, there have not been any changes to the survey dates. The closures will be taken into consideration when evaluating performance accountability for adult education.

36. Q: What will be the expectations on attendance documentation while online or hybrid?

A: Agencies are still required to document attendance for in-person classes; however, based on a waiver of 6A-10.0381 (9), students with more than six consecutive absences are not required to be procedurally withdrawn. For asynchronous online courses, the attendance hours reported would be based on the actual time spent engaged with the online content. This can also include hours based on teacher-to-student communications. Additionally, a waiver of 6A-10.0381 (10)(b), allows agencies to combine hours from online and classroom-based activities in the same course. Agencies are no longer required to separate the activity into separate courses.

37. Q: For adult education instructional hour reporting, does Rule 6A-10.0381, Sections 13 and 14 continue to apply?

A: According to [Rule 6A-10.0381\(13\)](#), if a facility is closed due to an emergency, scheduled classroom and scheduled laboratory hours for those days may still be reported.

38. Q: Will we be required to extend the end dates of our programs to accommodate lost instructional hours or will that be a local decision?

A: The FDOE is refraining from making any decisions related to missed instructional hours until long-term impacts can be realized. As a reminder, districts do not need the state's approval to use available calendar days to remain in compliance with the minimum instructional hours required in law.

Testing Issues

39. Q: Virtual instruction can be facilitated fairly easily, but what about testing for industry and/or adult education? Do you have any suggestions on how students can test especially with all assessment centers closed?

A: [Rule 6A-6.014 \(4\)\(a\)1](#) has been waived, allowing you to enroll students in adult education without pre-testing. Agencies will have to use local discretion on which programs to enroll students. As soon as testing becomes available, agencies will need to pre-test students to determine an appropriate initial educational functioning level with which to report the student.

For industry certification testing, districts may consider the need for non-instructional activities to occur on campus while following [the most recent CDC guidelines](#).

40. Q: Has the FDOE waived the initial adult education testing requirements to place new students?

A: Yes. Required pre-testing for adult general education programs are waived for participants enrolling in Adult General Education courses (Rule 6A-6.014 (4)(a)1, F.A.C.)

41. Q: Can you please advise if the spring term will be extended, thus providing more time to post-test our Adult Basic Education (ABE) and English as a second language (ESOL) students?

A: There are no current plans to change the survey dates, however we are removing the requirement that testing occur within seven days of a course exit in order to report a Literacy Completion Point (LCP). This will allow you to report learning gains once you are able to begin retesting students. In addition, the closures will be taken into consideration when evaluating performance accountability for adult education.

42. Q: With schools closing, is there any direction on how to post-test students after 70 hours for our adult general education (AGE) programs? Many are transitioning to virtual and distance instruction.

A: We do not currently have the ability to offer proctoring for our AGE assessments online. Agencies should continue to provide instruction until they are able to open for testing. To facilitate the reporting of learning gains once you are able to post-test, we are removing the requirement that testing occur within seven days of a course exit in order to report an LCP. In addition, the closures will be taken into consideration when evaluating performance accountability for adult education.

Secondary CTE

43. Q: For secondary CTE courses, could credit for a course be given to a student who passes the related Industry Certification Exam?

A: Math and Science credit toward diploma requirements may be awarded under provisions in s. [1003.4282\(3\)](#). Specifically, the following is authorized:

- A student who earns an industry certification for which there is a statewide college credit articulation agreement approved by the State Board of Education may substitute the certification for one mathematics credit. Substitution may occur for up to two mathematics credits, except for Algebra I and Geometry.
- A student who earns an industry certification for which there is a statewide college credit articulation agreement approved by the State Board of Education may substitute the certification for one science credit, except for Biology I.