

COVID-19 Community Forum Q & A

Q1: Is NACCAS now allowing us to enroll in programs through June 2020?

A1. Yes, you are also allowed to enroll students who are to begin classes in June. You want to be sure that you keep those enrollments going. You do not need to get ED's approval for your temporary distance ed program, but it's simple courtesy to notify them. You can send them an email and say that you are now doing temporary distance ed and you've been approved by state and accrediting. That way you're just staying in contact with them so they know that you're doing something during these times.

Q2: If we have a clock hour program that includes clinicals but the students are unable to attend clinicals, can we provide distance learning for just the theory portion and have them complete clinicals at a later time?

A2. Yes, the clinicals can be done later. Put the student on a LOA if that is all that is left and the student can't attend a clinic site.

Q3: What about LOAs for students that exceed 180 days or their max time frames?

A3. No, there is no guidance that says that you can extend an LOA for more than 180 days. So you would have to drop your student and perform an R2T4 calculation. I don't believe you'd have to return the money because right now they're saying that you don't have return funds if you think the student is going to come back and had every indication that they were coming back. If they want to extend their leave, that's one of the areas where the LOA is statutory and written in the HEA. The leave of absence can't extend beyond 180 days.

If the student is currently on a shorter LOA, they can extend the LOA up to 180 days, but that request has to be in writing and approved ASAP.

Q4: If a student has exhausted 180 days on their LOA and requires additional LOA due to COVID-19, will the department grant leniency in allowing more than 180 days in a 12 month period of time?

A4. No, there is no guidance that says that you can extend an LOA for more than 180 days. So you would have to drop your student and perform an R2T4 calculation. I don't believe you'd have to return the money because right now they're saying that you don't have return funds if you think the student is going to come back and if the student had every indication that they were coming back. But again, the LOA max is 180 days. If the

student has already been on an LOA and wants to extend the LOA, it isn't possible. This is one of the areas where the LOA is statutory and written in the HEA that a leave of absence can't extend beyond 180 days.

Q5: If we choose to use TDE is it all or nothing? Meaning if we have students that choose not to participate must they be dropped or put on an LOA?

A5. Either you offer class at the campus, or you have TDE approval and offer it through distance education. You cannot offer both at one location. IF you have students who do not want to or can't do TDE, they must be dropped or put on a LOA.

Q6: If our current LOA policy accounts for 60 days only, are we able to extend to the 180 ED max without changing our policy?

A6. The school must follow the current LOA policy, if the current policy does not allow for anything past 60 days the school cannot break its policy. If the school is accredited by NACCAS and the school would like to change their LOA policy you must email NACCAS and include the school reference number and submit the LOA change to NACCAS for approval.

Q7: Can we use electronic signatures for leave of absence forms?

A7. Yes, if the school has the ability to electronically do this. That is fine for NACCAS and ED but again not all schools are prepared to do this. So, unfortunately if you don't have a method for them to come in and sign it then as you said they'll have to wait until they come back. You can send the request through email, but the form would have to be returned by snail mail, or on the mobile app.

Q8: Will Dept of Ed, NACCAS, etc allow DocuSign for signatures by remote students?

A8. Yes, if the school has the ability to electronically do this. That is fine for NACCAS and ED, but again not all schools are prepared to do this. So, unfortunately if you don't have a method for an electronic signature then they have to come in and sign it then as you said they'll have to wait until they come back. Email signatures for LOA's are not valid unless you have the mobile app or a secure student portal.

Q9: If a student has exhausted 180 days on their LOA and requires additional LOA due to COVID-19, will the department grant leniency in allowing more than 180 days in a 12 month period of time?

A9. The LOA is statutory and written in the HEA The leave of absence can't at this time extend beyond 180 days.

Q10: If I understand correctly, if we have been approved for distance learning by state and NACCAS and we offer LOA, anyone who does not participate should be placed on LOA until we are back in the brick and mortar setting extending the LOA with new form if date is passed with closures?

A10. Please follow your school's LOA policy, That's really important and if you want to change your LOA policy even temporarily for just Covid-19 issues, you must submit something to NACCAS in order to get an approval. The school must have a reasonable expectation that the student will return.

Q11: Do we have to get the State approval prior to actually doing TDE?

A11. Yes, almost always you have to have state approval before you have accreditation. There are a few States like the State of Florida that approval is automatic if approved by accrediting. You can apply to them and send them the very same paperwork that you send to your accrediting agency because they approve through accrediting. There's a few States like that, but you would fill out the paperwork for both at the same time and get approved. However, there are some states that it's State first and accrediting second and there's no loopholes in between so if you don't have it then accrediting obviously you can't proceed.

Q12: We only contact ED if we are closing completely temporarily? Either on campus or via DE? If we are already approved to provide DE do we still need to contact?

A12. Yes, as a courtesy, send an email to the region and make sure that you indicate that you are closing temporarily, and will reopen as soon as the state allows and it is safe for students and the staff. Also let them know that if you now have temporary distance education approval from the state and accrediting.

Q13: Do I have to notify FAME that we have TDE approvals?

A13. Yes, please send ED and state approvals to FAME, Nancy McCallum at nmccallum@Fameinc.com. FAME sent a reminder to all our schools that we will continue to send funds unless you had notified us to hold TIV funds because of temporary closures.

Q14: Can students we enrolled for our April and June starts and the schools are temporarily closed can they start with distance learning?

A14. Yes, Once you become temporarily approved all students can start getting paid under distance education without ever attending the brick-and-mortar campus first. If you get approved for distance ed and the state limits the number of hours that you can teach, you must stick to the state requirement. Remember to receive loans, the student must be attending at least half time. 12 hours a week for clock hour programs. If you already certified the loan and they drop below half time, it isn't a problem for the current payment period. If it is a credit hour program, half time is at least 6 credits per payment period. There could be a problem if the students are taking less than half time.

If the student is less than half time for the following term, the loan could not be processed for that term. They would not be eligible for loans until you got back into brick and mortar. You can still get them but not while they are less than half time. So enrollment status plays a big part in loan certification and subsequent payments.

Q15: How do we let the Department of Education know we are temporarily closed and providing TDE? Is there a specific person or email notification?

A15. You can notify your contact at ED that assisted with the school certification. The notice should include the date the school plans on closing temporarily and reopening. Make sure ED has the correct current contacts, and valid phone numbers, so they can stay in touch with you. But if your school is open, because you're now offering TDE then you're no longer closed just not physically at that campus.

Q16: What if a student doesn't want to participate in distance education but they're not sick or, not taking care of somebody or, not being quarantined?

A16. Then you would either use an LOA or you would drop them. The student would be expected to attend via TDE, unless they are ill, family member is ill, no day care, or can't access the internet or doesn't have the necessary equipment to participate.

Q18: For the students who go missing in action and do not respond to doing TDE or the request to LOA are we required to drop them after 14 days?

A18. Yes, but it would be 14 days from the time that you realize what was going on. So say you temporarily closed for a week while you were getting your approval for distance education. Then you contact everybody and tell them that DE is now available

and you don't get any response. You don't have any contact with them; you would have to withdraw them starting that day TDE was scheduled to start. That would be the DOD but your LDA would still be your last date of attendance. But your 14 day clock would start at the point you knew that the student didn't come in and you were unable to reach them.

Q19: Would they need documentation for the LOA proving they are not just wanting to be with their kids?

A19. You're back to what does your school require for LOA documentation? Some schools just allow the student to say they want an LOA because they have a personal problem with work or they don't have daycare or whatever. Does your school require documentation for that? If you require documentation you want documentation. Otherwise, you need to change your leave of absence policy not requiring documentation. So you still want to document that you're placing the student on a leave and why but if you say they have to give you back up then you're going to have to have some type of backup. Again very important, the school must follow your school's LOA policy. If you want to change your school's LOA policy even temporarily for just COVID-19 issues then the school must submit something to NACCAS (or your respective accrediting body) in order to get that approved.

Q20: We have informed students they need to stay with the same "Scheduled hours" not necessarily the same schedule...we have some students wanting to do some makeup time which is within our policy in normal conditions. Is this allowed now?

A20. So again, be careful with a Schedule and students wanting to make up hours. The school can allow for makeup time, just make sure that it is documented and supervised. Whatever you normally do even with temporary distance education.

**Q21: Can you use a digital software for E-signing like Hellosign or DocuSign?
Rephrased - Can you use a digital software for student signature like HelloSign or DocuSign?**

A21. Yes, the Department of Ed and NACCAS allow electronic signatures by students. However, the platform should be safe and secure and you can recreate the signature. This can be performed through the mobile app. You can update student contracts and have the student submit or sign an LOA, if the school has the ability to electronically do

this. But again not all schools are prepared to do that. So, unfortunately if you don't have a method for them to come in and sign it then they'll have to wait until they come back.

Q22: What about Adobe to sign if it's password protected?

A22. Yes, the Department of Ed and NACCAS allow electronic signatures by students. However, the platform should be safe and secure and you can recreate the signature. This can be performed through the mobile app. You can update student contracts and have the student submit or sign an LOA, if the school has the ability to electronically do this. But again not all schools are prepared to do that. So, unfortunately if you don't have a method for them to come in and sign it then they'll have to wait until they come back.

Q23: Any options available for entrance testing since we have gone to temporary distance learning?

A23. Sure entrance counseling can be done online and you can get a copy from NSLDS that they completed the counseling. Just send the student to the website just like they may do in your office. They go in there and be sure they select loan entrance testing, not something else, like financial literacy information or general information. Once they've completed it, you can access COD and the school can reprint counseling results (Entrance and Exit counseling).

Q24: What about new students needing to come and pick up their books and kits? Can they come clock in just to pick up their kit? (if we can't do both)

A24. No, the student can't just clock in to pick up your kits/books. It is not allowed. The student can only clock in and out to do some type of instructional activity or educational activity.

Q25: If a school is doing TDE we should continue to award and disburse FA correct? If the school is closing temporarily and not doing TDE we should halt cash...?

A25. In either case, you should inform FAME. If you've closed and you're not currently doing distance ed because you don't have your approvals and Fame is your third party servicer for drawing your funds, you have to let us know not to order cash. Please send an email to Nancy McCallum at nmccallum@Fameinc.com. A notice was sent to all of

our schools that we process, so you should have been aware of that. But that's just a reminder then once you have your distance education approvals for the temporary time, you need to send both state and ED approvals to FAME. That will turn your cash back on, if you had previously asked us to not draw down funds.

Q26: Can you give more detail on the 50 minute requirement? Documenting?

A26. You do not have to teach a clock hour program synchronously, but the school has to document that the student was actively involved for 50-60 minutes. The Electronic Announcement [EA030520](#) indicated you need more than just an email sending the requirements out to the student. You can send the course work out to the student by email, but after that you need to have some ongoing activity or attendance tracking whether it's a group chat, email discussion back and forth between the instructor and a group of students, partner tracking platforms, etc. Substantive interaction with your students is a requirement for all distance education programs.

Q27: Did you say NACCAS will not allow online education?

A27. No, NACCAS has approved schools accredited by them to participate in TDE, but you need to submit this to NACCAS along with your state approval. Include the school number. You can submit a petition for a variance for changing your schedule or LOA policy. Email it to Dr. Mirando or upload the request into the owner portal like you did for your TD application and it will be processed as soon as possible.

Q28: If our state allows theory only through DE and our students will only be part-time, how do we accommodate it if we are only approved for full-time attendance?

A28. Just change the students schedule on the enrollment contact, until they're back into the normal classroom. If you contracted the student for a full-time schedule and you're saying that you don't want to or you can't do anything other than a part-time schedule, the contract dates and schedule has to be revised to accommodate what is actually happening. Do what you say and say what you do and usually you're in pretty good shape. For clock hour schools as long as you are no less than 12 hours a week, you're still at least half time. That does not affect your payment schedule. If your payment amounts are always paid on full-time and if the student started at least half time, and now are less than half time, it isn't a problem for the rest of the payment period.

Q29: We only contact the Dept if we are closing completely temporarily? Either on campus or via DE?

A29. No, you should contact ED (any change within 10 days) as courtesy and you need to contact NACCAS in accordance with 5.3 of NACCAS rules. You have an obligation to let them know the school is temporarily closed via email. The school's email to NACCAS should include your reference number, and identify the date of the temporary closure and the date you anticipate opening.

Q30: If we are already approved to provide DE do we still need to contact?

A30. You do not need to get ED's approval for your temporary distance ed program, but it's simple courtesy to notify them. You can send them an email and say that you are now doing temporary distance ed and you've been approved by state and accrediting. That way you're just staying in contact with them and they know that you're doing something in case someone goes by the school and realizes you haven't just closed the door.

Q31: We have informed students they need to stay with the same "Scheduled hours" not necessarily the same schedule; we have some students wanting to do some makeup time which is within our policy in normal conditions. Is this allowed now?

A31. I assume you mean as it refers to temporary distance ed. I would say that the school should follow what your school would normally do also with distance ed even though it is temporary. It's exactly the same as if you were doing it in your brick and mortar campus.

Q32: 1. If the school is considered open due to offering TDE, does the school have to offer the number of hours equal to their contracted hours?

2. What about their SAP dropping if the same # aren't hours offered through distance education?

3. What about the minimum number of hours to receive Title IV funds?

A32. 1. The students contract would have to be adjusted and still teach the total number of contracted hours.

2. SAP progress only looks at qualitative component, which is grades, and quantitative component, which is amount of work completed, and max time frame. Attendance is not part of the equation.

3. In a clock hour program at least half time attendance of 12 hours a week is required to certify a new loan or to disburse loan funds in any payment period. Credit hour programs require students to be taking at least 6 credits per term to be half time and

eligible for loans. If the student isn't attending at least 6 credits one of the terms in the loan period, they can't be paid for that term when less than half time, but still eligible for the max loan amount that was certified. So there are some things to be mindful of concerning enrollment status. The enrollment status doesn't change after they've started until the beginning of the next payment period, during this crisis, students continue to be reported to NSLDS as in the same enrollment status as before.