March 13, 2020

TO:   ALL PRIVATE CAREER SCHOOLS
FROM:  PRIVATE CAREER SCHOOL LICENSING UNIT

RE:   GUIDANCE CONCERNING COVID-19 PANDEMIC

In response to the COVID-19 emergency, Governor Kate Brown’s recent executive orders and the overall growing concern across our population, the Oregon Higher Education Coordinating Commission is issuing the following guidance for all licensed private career schools (Schools). We issue this guidance to help our schools provide safe learning environments for your staff and students and in some cases customers due to COVID-19 interruptions.

Effectively immediately:

1. TEMPORARY SUSPENSION OF OPERATIONS

   • Schools may choose to suspend educational activities temporarily thru April 1, 2020.
   • For temporary suspension of operations, schools shall:
     ✓ Notify your HECC specialist in writing (email) of suspension of operations.
     ✓ Notify your students in writing (email) of the temporary suspension of operations and cc your HECC specialist on the notice that is sent to students.
     ✓ Follow any guidance or requirements of your accreditor, USDOE or other regulating body.
   • Schools on temporary suspension of operations must makeup missed content (as operations resume), and extend the enrollment contact, as needed, at no financial cost to the student.
   • HECC will re-evaluate this option prior to April 1, 2020 to determine if an extension is necessary or other provisions need to be implemented.

2. TEMPORARY DISTANCE LEARNING OPTIONS

   Schools may choose to implement distance learning options for currently enrolled students who have started their educational program. This option is recommended, whenever feasible, where physical, face-to-face instruction is inadvisable due to social distancing guidelines.

   • Approval is temporary thru April 1, 2020. This will be re-evaluated prior to April 1, 2020 and additional guidance may be issued.

   • Approval applies only to theory portions of educational programs, not practical or work demonstrations done in close proximity to others.
For approval of temporary distance learning, schools shall:

✓ Notify your HECC specialist in writing (email) of your intent to offer distance learning
✓ Notify your students in writing (email) of your intent to offer distance learning and cc your HECC specialist on the notice that is sent to students.
✓ Follow any guidance or requirements of your accreditor, USDOE or other regulating body.

For all schools, HECC recommends following the March 5, 2020 guidance from the USDOE Federal Financial Aid Office for minimum expectations of what distance learning can look like. We recognize some Schools may be better equipped than others to offer programs in a distance learning format. Therefore, although not all Schools are approved for federal financial aid, the HECC finds these guidelines to be clear and allow the most flexibility for schools to provide this option. The guidelines are:

- Distance learning does not require the use of sophisticated learning management systems or online platforms, though accreditors may have additional standards included in their review of distance learning programs.
- A School should communicate to students through one of several types of technology – including email.
- Instructors must initiate substantive communication with students, either individually or collectively, on a regular basis. For example, an instructor could use email to provide instructional materials to students enrolled in his or her class, use chat features to communicate with students, set up conference calls to facilitate group conversations, engage in email exchanges or require students to submit work electronically that the instructor will evaluate.

Should you have students who do not have access to participate in your distance learning delivery model, please work with those students to access their needs and make any reasonable accommodation you can.

STUDENTS

- If a student chooses not to participate in one of the options your school offers and decides to not continue and drops from your program, your regular approved refund policy will apply.
- However, HECC encourages Schools to work with students whenever possible to make acceptable alternate arrangements.
- Schools can choose to offer refunds on a more generous policy that is more beneficial to the student.

GENERAL

The HECC encourages Schools to utilize maximum flexibility (wherever possible) for students who have concerns about completing their education during this COVID-19 interruption.
HECC recommends that Schools not enroll any new students and not begin programs for students already enrolled but who have not started their program during this COVID-19 interruption.

Please make every effort to provide a safe environment for learning following the guidance of your State and Federal regulatory agencies and government.

HECC recommends a deep cleaning of all school facilities, especially prior to bringing students into the school environment.

Stay informed, as new developments are happening very quickly. HECC will post resources and updates as quickly as possible to our webpages, specifically www.oregon.gov/highered/about/Pages/COVID-19.aspx.

You can also access from the front page of the HECC website at www.oregon.gov/highered. The link is on the upper right-hand side under “What's New.”

SUMMARY

Should you have questions, please contact your school specialist. The measures and options outlined here are temporary and will be re-evaluated and additional guidance provided, as necessary.

Please take the steps you feel are most appropriate for your School, provide the notifications outlined above, and follow CDC and health official guidelines.

Follow guidelines and provide appropriate notification to your other regulators.

The HECC intends to apply maximum flexibility to help each School and the students you are teaching.

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