



# Oregon

Kate Brown, Governor

Higher Education Coordinating Commission

Office of Academic Policy and Authorization

Private Career Schools Licensing Unit

3225 25th Street SE

Salem, OR 97302

[www.oregon.gov/HigherEd](http://www.oregon.gov/HigherEd)

## ***DRAFT GUIDANCE FOR DISCUSSION ONLY***

*PRIVATE CAREER SCHOOL ADVISORY COMMITTEE*

*March 17, 2022*

### **GUIDANCE FOR PRIVATE CAREER SCHOOLS COVID 19 EMERGENCY DECLARATION (EO 20-03) LIFTED, EFFECTIVE April 1, 2022**

Governor Kate Brown's Executive Order 20-09, suspending in-person instruction, was issued March 18, 2020, and applied to all public and private degree granting institutions within the state of Oregon. Oregon Private Career Schools were not specifically included within the Executive Order. The mandates included:

- Move all instruction online from March 21, 2020 through April 28, 2020 (paragraph 2). Exceptions to this Order were as follows:
  - o clinical, laboratory, or other in-person instruction associated with courses required for the completion of a health care-related certificate, license, or degree, or other certificates, licenses, or degrees that are essential to emergency response and resiliency efforts, where no remote or online alternative is practicable
- Limiting on-campus operations only to critical functions [during the effective period] and shall employ social distancing measures, consistent with guidance from the Oregon Health Authority, for all on-campus employees and residents. Critical functions may include, but are not limited to, the operation of dormitories, dining services, general administrative services, safety programs, childcare centers, research, medical facilities, and other activities critical to emergency response and resiliency efforts.

In response to Kate Brown's Executive Order 20-09, although the Order did not apply to private career school, the HECC Office of Private Career Schools (PCS) issued the following general guidance in 2020 to help PCS schools operate during the pandemic:

- Oregon private career schools were not included in the Governor's Executive Order. Oregon private career schools were strongly urged to follow the Executive Order issued March 18, 2020 to the best of their ability.

- Follow the guidance you receive from your accreditor, US Department of Education, Oregon Health Authority, and other regulatory agencies as applicable.
- HECC PCS carried out regulatory functions as normally as possible and within the Governor's guidelines. This includes, but is not limited to, sending out and processing license renewals, teacher registrations, responding to schools and students, etc. Should your school license renew during COVID-19 interruptions and you need to request a delay or extension of licensure fee payment, HECC will grant those on a case by case basis. Schools may also request division of annual license fees into as many as three installments. Again, this will be granted on request on a case by case basis.
- Those programs that are high-risk or high-contact were strongly urged to cease all in person teaching and procedures that require person to person contact.

### **New General Guidance**

Governor Brown's Executive Order 20-03, declaring a state-of-emergency due to the COVID-19 pandemic, is being rescinded as of April 1, 2022. With the rescinding of EO 20-03, most of the COVID-19 related mandates will be lifted. Additionally, the statewide mask mandate has been lifted, effective March 12, 2022 (with limited situations / circumstances still requiring masking), and the Vaccine mandate for Executive Branch employees and workers, [Executive Order 21-29](#) has been rescinded, effective April 1<sup>st</sup>.

### **What Does this Mean for PCS Schools?**

- Requirements under EO 20-12 Stay Home, Save Lives:
  - Online instruction: For schools who have temporarily switched to an online delivery model (due to the pandemic), in full or in part, HECC is offering schools a one-time window of time to make that program delivery model permanent, without a new program fee. Schools must submit to their assigned specialist the following Post-COVID-19 Program Change Forms:
    - a) Program Outcome Summary
    - b) Program Map
    - c) Syllabus

Schools will have until **July 1, 2022**, to submit the forms and request a permanent change to the delivery of their approved program(s).

- Any changes submitted after July 1, 2022, will be evaluated on how much of the program will be changed. HECC will apply a standard of 25% or more of the program being changed to determine whether a new program fee will be charged. For example, for an approved resident program of 100 hours, changes to 25 hours or more would be considered a new program.

- Distance Learning: For schools that made a temporary change to distance learning and that intend to go back to their regular resident delivery model, HECC is considering a window of time for schools to make the transition back to the regular delivery mode.

HECC seeks input from the Advisory Committee for how long schools should have to transition back. Would 6 months be enough? Do schools need longer? What are the school's experience with transitioning students?

Several factors need to be considered as schools move away from temporary distance learning and back to regular resident instruction.

- a) HECC encourages schools to offer maximum flexibility for students who may not be able to continue. What will schools do to accommodate these students?
  - b) If currently enrolled students are to change to the new delivery model, the school should seek written agreement from the student that they agree to the changes and understand the new schedule and expectations.
  - c) Staff who have now been essentially teaching from home may also have issues or need time to plan for a return to the school campus.
- Masks: Follow the guidelines on the Governor's website from Oregon Health Authority (OHA) for businesses in general or your sector in particular (Personal Care for cosmetology, tattoo, massage, etc.)
    - For schools no longer requiring masks or social distancing, there may be students who still feel safer or want to continue wearing a mask because they have high-risk family members. Schools should exercise flexibility and students and staff should continue to foster a supportive learning environment for all students.
  - Vaccines: Please refer to the Bureau of Labor and Industry guidance over vaccine requirements: <https://www.oregon.gov/boli/workers/Pages/covid-vaccine.aspx>

## Start Planning Now

Because the state-of-emergency due to the COVID-19 pandemic, is being rescinded as of April 1, 2022, schools need to start planning for any changes now. Once the school knows how they will proceed – in terms of delivery of programs, masking or not - HECC encourages schools to start communicating with students early. The best documentation is in writing with the student signing off on any changes. Schools may

want to start with staff, then meet with cohorts together and then with students individually to determine any issues or needs.

Schools need to also be prepared for changes, should the Governor determine that certain mandates need to be re-implemented. This will most likely be based on increases in numbers and hospitalizations. Should requirements be re-implemented, schools should follow any new guidance from the Oregon Health Authority and local jurisdictions.

[Coronavirus.oregon.gov](https://coronavirus.oregon.gov) : [Building a Safe & Strong Oregon](#) : [Homepage](#) : [State of Oregon](#)

Please continue to monitor the HECC COVID-19 website for updates and new information.

Thank you for continuing to offer education to Oregonians.

Karyn Chambers (Education Specialist) [karyn.chambers@hecc.oregon.gov](mailto:karyn.chambers@hecc.oregon.gov)

Peter Gertenrich (Education Specialist) [peter.gertenrich@hecc.oregon.gov](mailto:peter.gertenrich@hecc.oregon.gov)

Monika Peterson (Compliance Specialist) [monika.peterson@HECC.OREGON.GOV](mailto:monika.peterson@HECC.OREGON.GOV)

Kia Sorensen (Interim Deputy Director) [kia.sorensen@hecc.oregon.gov](mailto:kia.sorensen@hecc.oregon.gov)