Ocean County Vocational Technical School Pandemic Management Plan

March, 2020 Update, May 19, 2020 NJDOH guidance identifies school closure as a potential strategy to limit transmission within a community. In the event a board of education is provided a written directive by either the NJDOH or the health officer of the jurisdiction to institute a public health-related closure, the board of education may utilize home instruction to provide instructional services to enrolled students. The provision of home instruction services should be guided by N.J.A.C. 6A:16-10.1 and may include direct services, online instruction, services provided through contract with another district board of education, or any other means developed by the district to meet the needs of its students. Any day in which students impacted by a public health-related closure have access to home instruction services provided consistent with the guidance in this memo will count as a day in which the board of education has provided public school facilities toward its compliance with the 180-day requirement in accordance with N.J.S.A. 18A:7F-9.

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Pandemic Management Plan For Ocean County Vocational Technical School District

Information on COVID-19

The Center for Disease Control (CDC) is presently responding to the outbreak of a respiratory disease caused by a novel coronavirus that originated in China and has now been detected internationally, including the United States. The actual name of the virus is SARS-CoV-2 and has been named "coronavirus disease 2019".

Coronaviruses are one of many viruses that are common in people and certain species of animals as well. It is rare that an animal coronavirus can infect people and then spread between people but the coronavirus is one that spreads in this manner. MERS-CoV and SARS-CoV are two viruses that are similar in their potential of spreading from animal to people. All three of these viruses are believed to originate in bats.

The outbreak began in Wuhan, Hubei Providence, China where there is linkage to a seafood and live animal market, suggesting animal-to-person spread. Later, a growing number of patients became ill with the virus leading to the determination of person-to-person spread of the disease. The virus continued to spread outside Hubei Providence as well as countries outside of China including the United States. The COVID-19 became an apparent community spread as those people infected do not know where they were exposed.

The coronavirus is spread mainly from person-to-person between people who are in close contact with another person, approximately 6 feet. When an infected person sneezes or coughs, respiratory droplets can enter the mouths or noses of nearby people which can be inhaled into the lungs. Those that are ill are at their most contagious when they are the sickest but some spread before the symptoms occur.

A person can also become infected with COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose or eyes. Prevention strategies to include washing hands, covering noses and mouths when sneezing with a tissue or sleeve and conducting frequently sanitizing are implementations to create a healthy school environment

Purpose:

Throughout the last century, pandemics resulted in disease and loss of life within the United States, with even greater consequences in other countries. An epidemic is an outbreak of an illness in a specific area. A pandemic is a worldwide outbreak of an illness. During a pandemic, most infected persons are young and otherwise healthy individuals. The Center for Disease Control (CDC)

anticipates the probability of a future event that could infect 200,000,000 people and result in 100,000 to 200,000 deaths.

Schools are a primary site for transmission of influenza and disease because children are the primary occupants who tend to transmit disease more rapidly. Children lack the ability to contain the disease because of their close proximity and inability to control the disease carrying droplets found in coughs and sneezes. Prolonged exposure to germs and extended length of illness often lead to high and extensive absences.

The coronavirus is capable of infecting a large number of people and subsequently stressing the health care system. The community itself is subject to disruption of essential services related to high absenteeism in necessary services such as law enforcement, communication, education, fire and emergency services, and public transportation.

Planning and implementation for the Pandemic Management Plan focuses on the following goals:

- Limiting the number of illnesses and deaths
- Preserve continuity of essential school services
- Minimize educational and social disruption
- Minimize academic and economic losses.

Planning Assumptions

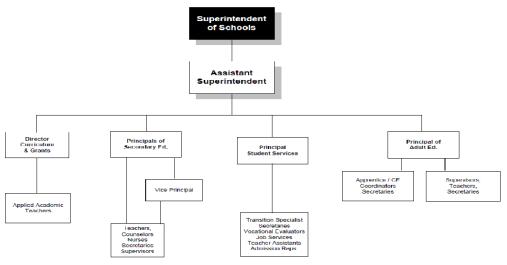
Constructing a cohesive school disaster plan requires a strong focus on the demographics of the population of the district. The underpinnings of the plan rely on several assumptions regarding the pandemic and the school-aged population. The first assumption is that the coronavirus will last for several weeks or even several months. The second assumption is that at least 30% of the population will contract the virus. Next, young school-aged children are more vulnerable to disease than older children are and are more apt to transfer the disease. Young children fail to contain the droplets transferred in coughs and sneezes. Each infected individual transmits the disease to two more individuals. The district, as employers, prepares to function with a 30-40% reduction of its workforce due to absenteeism resulting from the pandemic.

Planning for a pandemic disease assumes the coordinated effort to minimize disease, identify specific roles and promote the coordination and communication of the services. At the same time, it is incumbent to realize that a pandemic virus is worldwide and other communities suffer the same crisis. Critical surveillance of outbreaks throughout the world remains paramount throughout the planning stages. During a pandemic, it remains possible that communities must remain self-reliant due to the potential impact on other communities, states, and federal agencies.

Minimizing disease transmission through healthy hygiene practices is the hallmark of prevention. Health maintenance through antiviral medication administration will most likely be compromised. A lag in development time and high demand contributes to an anticipated lack of antiviral medication. Vulnerable populations receive the first doses; children are the most vulnerable. Community resources such as law enforcement, healthcare providers, public service utilities, and transportation suffer the same disruptions as other community systems. Reduction of disease transmission depends on social distancing. Social distancing includes closing schools, cancelling social gatherings and sports events, and postponing some public gatherings. To provide effective planning the municipality, schools, healthcare facilities, public services, and civic leaders collaborate on a disaster plan to protect the entire community.

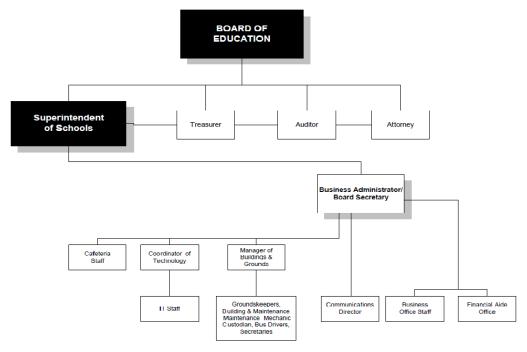
OCEAN COUNTY VOCATIONAL TECHNICAL SCHOOL

Administrative Organization Chart (A)



OCEAN COUNTY VOCATIONAL TECHNICAL SCHOOL

Administrative Organization Chart (B)



The Superintendent assigns the appropriate school administrators in the following positions;

- The Assistant Superintendent is responsible for the curriculum and development of lesson plans and supervising the individual building administration during all phases of the pandemic outbreak.
- The building principals and vice principals are directly responsible for the supervision and continuity of the operations of the learning environment during the pandemic outbreak phases 1-6.
- The Curriculum Supervisor is responsible for supervising faculty and curriculum plans and report to the Assistant Superintendent.
- The Coordinator of Technology supervises the communication needs of the district through the internet and technology.
- The Business Administrator supervises the vendor services, support services, transportation services, and business offices.

Prevention

Each school nurse will disseminate messages about preventive hygiene and conduct respiratory etiquette programs (cough in your sleeve).

The manager of Buildings and Grounds will ensure that all building bathrooms are continually stocked with soap and paper towels.

The manager of Buildings and Grounds will insure that all student contact spaces are sanitized on a frequent and regular basis.

Teachers, building staff and administrators will remind students to cover their coughs and sneezes.

Preparedness

The CSA will provide updates and the latest research information to staff, students, and parents via the district website, robo calls and email.

Building principals will cancel and announce cancellation of all large group activities including sporting events if directed to do so by the NJ Health Department and/or County Superintendent's office as needed.

Student seating will reflect social distancing to the fullest extent possible; student desks will be separated if directed to do so by the NJ Health Department and/or County Superintendent's office.

Each school nurse will disseminate messages about preventive hygiene and conduct respiratory etiquette programs (cough in your sleeve). Dissemination techniques will include, but not be limited to, classroom presentations, press releases, school-wide posters, videos and training to

staff via in-services or faculty meetings, hand washing signs in all bathrooms. Teachers will be trained in pandemic related symptom identification.

The Supervisor of Buildings and Grounds will ensure that all building lavatories are continually stocked with soap and paper towels.

The Supervisor of Buildings and Grounds will ensure that all student contact spaces are sanitized on a daily basis; hand washing signs will be posted.

Teachers will prepare on-line lessons for all classes presently instructing.

Informational literature will be sent home identifying the protocols parents should use to keep students home.

Building administration will remind staff to review this plan.

Update to School Closure Plan

Delivery of Virtual and Remote Instruction

Students will be provided instruction using a variety of remote platforms. Assignments, participation, and effort will constitute grades in all classes. Ample time will be provided to complete assignments with consideration of individual needs of all students. Differentiated instruction to meet the needs of all learners will continue.

Students that attend the academies that do not have access to technology, the Ocean County Vocational Technical School District (OCVTS) will provide Chrome Books or lap tops during the closure. For students without internet, packets will be mailed home with return envelopes, collected and disseminated to the appropriate instructors. Shared time students will be provided with technology by their sending districts if they do not have access to units at home.

Attendance

Attendance is taken daily and is determined by remote participation and assignment completion. All instructors are required to reach out to students, parents, guidance counselors and their building principal should a student not participate or complete assignments. In shared time programs, guidance counselors from the sending districts will be contacted. OCVTS guidance counselors will be involved if students are not communicating, participating or completing assignments.

Students with Disabilities

Students with disabilities prescribed accommodations will be followed in all 504s and IEPs. Special Education instructors will continue to work with these students as usual, by attending remote classes and working with students individually. All documentation can be found in Real Time. Our Special Education Specialist provides support to guidance counselors and instructors

as needed to support those students with accommodations. IEP and 504 meetings with the principals, guidance counselors, parents, instructors and students are done remotely.

Safe Delivery of Meals

Meals on Wheels provides lunch for our qualified students. This will continue through the end of the current pandemic related closure.

Facilities

All OCVTS buildings have been cleaned, sanitized and disinfected after the closure. The buildings continue to be maintained as staff members enter the buildings either daily or on alternate days. All Heating and Air Conditioning systems were professionally cleaned right after the closure to ensure all areas of contagions have been decontaminated.

English Language Learners

There are no identified English Language Learners in the Ocean County Vocational Technical School District at this time.

Summer Programming

Summer programs would be coordinated by our sending districts.

Communication

Communications with the public and health care providers will be one of the most critical strategies for containing the spread of the virus and for managing the utilization of health care services. This plan's communications goals are to:

- a. Provide accurate, consistent, and comprehensive information about the pandemic including case definitions, treatment options, infection control measures, and reporting requirements.
- b. Instill and maintain public confidence in the school and our ability to respond to and manage a pandemic.
- c. Ensure an efficient mechanism for managing information between OCHD and the Ocean County Vocational Technical School.
- d. Contribute to maintaining order, minimizing public panic and fear, and facilitating public compliance by providing accurate, rapid, and complete information.
- e. Address rumors, inaccuracies, and misperceptions as quickly as possible, and prevent the stigmatization of affected group
- f. Under the direction of the Ocean County Superintendent of Schools, the administration will assess the needs of the schools.

- i. Assess the information needs of the school community.
- ii. Intensify public education efforts about a pandemic and steps that can be taken to reduce exposure to infection. Information may be disseminated via web site postings, parent letters, or school newsletters, television and radio broadcasts.

Mitigation

Mitigation activities are taken in advance of a pandemic to prevent or temper its impact. Mitigation efforts will occur primarily during the early pandemic phases. The Ocean County Vocational Technical School:

- Plans, exercises and revisits the Pandemic Management Plan
- Trains and updates staff to assure competencies and capabilities needed to respond to a pandemic outbreak.
- Educates the students and parents about a potential pandemic.
- Stockpiles necessary equipment and supplies needed to respond to a pandemic.

Social Distancing Strategies

Social distancing strategies are non-medical measures intended to reduce the spread of disease from person-to-person by discouraging or preventing people from coming in close contact with each other. These strategies could include: closing schools and closing all public assemblies or after school activities.

Students and staff will be surveyed for technology capabilities (internet/form of technology) in the home.

Student learning activities will be provided to all students via the use of the internet.

Both electronic and paper based daily assignment will be provided to all students.

E-mail addresses from all students will provide instructors the ability to continue and reinforce skills.

Daily participation between the students and the instructors will provide verification that the students are present for the school day.

Recovery

Ocean County Vocational Technical School will update and maintain continuity of operations plans and protocols that address the unique consequences of a pandemic.

Ocean County Vocational School will follow best practice guidelines for return to work after a pandemic illness. Because experts do not know whether the mode of transmission, incubation period, or contagious period of pandemic strains of the virus will be similar to those of seasonal influenza (recurring yearly), Ocean County Vocational Technical School will update and follow specific recommendations from the Ocean County Health Department during a pandemic. Upon returning to the school environment, students and staff should continue to follow cough etiquette and hand washing protocols.

In conjunction with OCHD, the District will educate central administration and the school community that provide essential services about the need for continuity of operations planning in advance of a pandemic.

School recovery from a pandemic will begin when school officials determine that normal supplies, resources and response systems can manage ongoing school activities.

Ocean County Vocational Technical School will assess the educational impact of the pandemic.

Recovery plans will depend on the severity and duration of the pandemic but will include recovery plans to mitigate education as well as emotional recovery plans.

OCHD will recommend specific actions to be taken to return schools and district offices to preevent status including environmental sanitation.

Ocean County Vocational School will conduct an after-action evaluation of the pandemic response. The evaluation will include recommendations for amendments to the Pandemic Management Plan.

OCVTS Pandemic Management Plan State and County Contact Numbers

State

Office of the Governor: Phil Murphy	
Office of Emergency Management (OEMM): New Je	ersey State Police:
Major Dennis McNulty	(609)882-2000 x6932
Department of Health: Judith Persichilli	(609) 292-7837
Public Information Officer: Carmon Cuido	(609) 376-9072
Department of Education: Commissioner Lamont Rep	pollet(609) 376-3500

County

Office of Emergency Management: Ocean County Sheriff's Office, Captain				
Valerie Hill, Director	(732) 341-3451			
EMS Director: Harold Morris	1-800-723-2088			
Public Health Coordinator: Daniel Regenye	(732) 341-9700 x7515			
County Health Investigators: Mukesh Roy	(732) 341-9700 x7288			
County Public Information Officer: Donna Flynn	(732) 929-2089			
County Superintendent: Kevin Ahearn	(732) 929-2078			

OCVTS Pandemic Management Plan Local District Contact Numbers

OCVTS SCHOOL CRISIS TEAMS

DISTRICT

	NAME	WORK PHONE	E-MAIL
Superintendent	Karen Homiek	732-240-6414	khomiek@
		x3317 x3333	mail.ocvts.org
Asst.	Dr. Michael	732-240-6414	mmaschi@
Superintendent	Maschi	x3318 x3332	mail.ocvts.org
Business	Frank Frazee	732-240-6414	ffrazee@
Administrator		x3315 x3331	mail.ocvts.org
Principal of	Alison Carroll	732-473-3100	acarroll@
Student Services		x4001	mail.ocvts.org
Director of	Ed Crawford	732-473-3100	ecrawford@
Buildings &		x3112	mail.ocvts.org
Grounds			
Director of	Greg Lasky	732-473-3100	glasky@
Technology	·	x3127	mail.ocvts.org
Director of	Gary MacDonald	732-240-6414	gmacdonald@
Curriculum/Grants		x3330	mail.ocvts.org

BRICK CENTER

	NAME	WORK PHONE	E-MAIL
Principal	Lynn Sauer	732-286-5670 x3214	lsauer@mail.ocvts.org
Vice Principal	Tiffany Seeley	732-286-5670 X4145	tseeley@mail.ocvts.org
Counselor	Brett Mekles	732-286-5670 X3163	bmekles@mail.ocvs.org
Nurse	Theresa Pulvano	732-286-5670 x3413	tpulvano@mail.ocvts.org
Custodian	Roman Khariv	732-286-5670 x3219	rkhariv@mail.ocvts.org

CUISINE ON THE GREEN

	NAME	WORK PHONE	E-MAIL
Principal	Gary MacDonald	732-240-6414 X3330	gmacdonald@mail.ocvts. org
Head Teacher	Bruce VanSickle	609-296-2137	bvansickle@ mail.ocvts.org
Custodian	Jeff Portizo	609-296-2137	jportizo@mail.ocvts.org
Back-up #1	Sandi Beattie	609-296-2137	sbeattie@ mail.ocvts.org

JACKSON CENTER

	NAME	WORK PHONE	E-MAIL
Principal	Kevin Dineen	732-286-5665	kdineen@
		x3123	mail.ocvts.org
Head Teacher	Robert Gonsalves	732-286-5665	rgonsalves@
		x3417	mail.ocvts.org
Counselor	Mike Carlo	732-286-5660	mcarlo@
		X3414	mail.ocvts.org
Nurse	Joann Linderoth	732-286-5665	jlinderoth@
		x3215	mail.ocvts.org
Custodian	John McCarthy	732-286-5665	jmccarthy@
		x3421	mail.ocvts.org

MATES

	NAME	WORK PHONE	HOME PHONE	E-MAIL
Principal	John Biscardi	609-978- 8439 x3237	n/a	jbiscardi@ mail.ocvts.org
Supervisor	John Wnek	609-978- 8439 x4002	n/a	jwnek@ mail.ocvts.org
Counselor	Kate Conway	609-978- 8439 x4013	n/a	kconway@ mail.ocvts.org
Nurse	Gail Meehan	609-978- 8439 x4012	609-693- 6447	gmeehan@ mail.ocvts.org
Custodian	Dave Morgan	609-978- 8439 X3219	n/a	dmorgan@ mail.ocvts.org

PERFORMING ARTS ACADEMY

	NAME	WORK PHONE	E-MAIL
Principal	Christine Santasieri	732-286-5678 x4105	csantasieri@mail.ocvts.org
Vice Principal	Tierney Meeker	732-286-5678	
Counselor	Sandra Stout	732-286-5678 x4151	sstout@mail.ocvts.org;
Nurse	Karen Haber	732-286-5678 x4109	khaber@mail.ocvts.org
Custodian	John Sweeney	732-286-5678 x4107	JSweeney@mail.ocvts.org

STUDENT SERVICES/SPECIAL SERVICES

	NAME	WORK PHONE	E-MAIL
Principal	Alison Carroll	732-473-3100 x4001	acarroll@ mail.ocvts.org
Admissions Rep	Nicole Wallner	732-473-3100 x3122	nwallner@ mail.ocvts.org
Secretary	Jen Stanton	732-473-3100 x3125	jstanton@ mail.ocvts.org
Secretary	Patricia Colasurdo	732-473-3100 x3326	pcolasurdo@ mail.ocvts.org
Special Services Counselor	Jen Etzkorn	732-473-3100 X3241	jetzkorn@ mail.ocvts.org

TOMS RIVER CENTER

	NAME	WORK PHONE	E-MAIL
Principal	Lillian Zavattieri	732-473-3100 x3512	lzavattieri@ mail.ocvts.org
Vice Principal	Mike Tash	732-473-3100 x3208	mtash@ mail.ocvts.org
Counselor	Cheryl Mulrooney	732-473-3100 X3422	Cmulrooney@ mail.ocvts.org
Nurse	Cyndi Daullary	732-473-3100 x3106	cdaullary@ mail.ocvts.org
Custodian	David Mihalko	732-473-3100 x3075	dmihalko@ mail.ocvts.org

WARETOWN CENTER/ACADEMY OF LAW AND PUBLIC SAFETY

	NAME	WORK	E-MAIL
		PHONE	
Principal	Tom McInerney	732-286-5660	tmcinerney@
		x3412	mail.ocvts.org
Head Teacher	Lou Gauvian	732-286-5660	lgauvain@
		X3533	mail.ocvts.org
Counselor	Alison	732-286-5660	aprendeville@
	Prendeville	x x4029	mail.ocvts.org
Nurse	Dana Nosti	732-286-5660	dnosti@
		x3514	mail.ocvts.org
Custodian	Bob Quist	732-286-5660	bobquist@
		x3519	mail.ocvts.org

OCVTS's Educational Capabilities

The CSA supervises the delegated responsibilities promulgated in the policy of the Pandemic Management Plan. In the event school is closed, the twelve-month staff will continue to meet their job related responsibilities as stated in their job description.

- The AS oversees the curricula needs of the students. The AS collaborates with the Principals to provide instruction and supervision to teachers regarding lessons and plan.
- The AS communicates with the Principals to initiate review of lesson plans on a class and grade level.
- The CSA, AS, and Principals choose the formats for distribution of the lesson plans and assignments. This could include internet broadcasts and/or paper assignments.
- The Principals communicate daily with the faculty via email.
- The Principals assist the Vice Principal and Supervisors in reviewing and collecting faculty lessons.
- The Principal delegate cross-training of office personnel to assist the parents and students in receiving academic assignments.
- The office personnel receive specific assignments. The administrative secretaries continues the flow of work required to operate the school.

The CSA approves the dissemination of information under the supervision of the Coordinator of Technology.

The BA delegates the cross training of responsibilities to maintain continuity of district business. The BA consults with vendor services to meet contract needs during an extended school year. The BA insures that the district has the materials to continue providing academic support to the students throughout the Pandemic closure.

Pandemic Procedures to Date: March, 2020

Administrators were all informed of the plan for preparedness necessary should our district have to close due to Public Health-Related School Closures.

All staff members were sent the memo from the Department of Education from Lamont O. Repollet, Ed.D, Commissioner of Education, on "Guidance Regarding Requirements for Public Health-Related School Closure."

All building administrators were requested to call an emergency faculty meeting after school to share the plans necessary for their building should there be a school closure.

Academy students completed a survey as a way to inform the building principal if they had internet access in the home. In this survey, we requested the type of technology available in the home. These surveys were collected and we were able to identify those students in need of technology.

- All Academy instructors were directed to prepare a minimum of 10 inter-active lessons.
 These lessons are to be kept on file and with the instructor via flash drive or email to self should the district close.
- These lessons will be shared with the students in their classes through the internet via the communication platform that the instructor and the student have utilized throughout the year (Edmodo, Google Classroom, Box, Remind, etc.).
- These lessons should require a response from the students and the instructors should give feedback to the students daily.
- For those students without internet in the home, phone delivery will be provided. We have provided information to these identified students/parents on the program supported by Comcast.
- No tests or quizzes should be part of the 10 lessons
- If the district experiences a pandemic incident, instructors should be prepared to continue to design lesson plans if the event lasts longer than 10 school days.

All shared time students completed a survey to not only inform the district if they had internet access in the home, but also to retrieve students' email addresses. Students selected the program they were enrolled in thus allowing us to send the email addresses to the instructors of the programs. After all students were surveyed, teachers had the individual emails to communicate lessons daily. All shared time instructors were directed to prepare a minimum of 10 lessons. These lessons can be inter-active for those that utilize this type of technology.

- These lessons will be shared with the students in their individual programs through the internet via communication (Edmodo, Google Classroom, Box, Remind, etc. or any other collaborative platform).
- For those instructors that prefer to provide instruction though email delivery to and from the student, they have all email addresses.

- The lessons should require a response from the students, and the instructor should provide feedback to the students.
- For those students without the internet in the home, phone delivery of the lessons can be provided.
- No tests or quizzes should be part of the 10 lessons.
- If the district experiences a pandemic incident, instructors should be prepared to continue to design lesson plans if the event lasts longer than 10 school days.
- Students identified without the internet will be provided with packets for continuation of instruction.

General Procedures for Academies:

Instructors will provide students with daily instruction for the progression of learning in all subject areas in the academies' curriculum.

Students must complete these assignments and submit daily to their instructors.

Staff members will respond to these assignments daily and provide support as needed.

Learning assignments can include reading, writing, video or video tasks as determined by the instructor.

Communication between staff and students will result in a daily grade.

Packets for students without the internet will be provided.

General Procedures for Shared Time Programs

Instructors will provide students with daily instruction for the progression of learning in their program's curriculum.

Students have provided instructors e-mail addresses to deliver lessons in case there is limited access to technology or limited skills.

Instructors will be available via e-mail, phone conference or whichever internet communication platform selected.

Communication between staff and students will result in a daily grade.

Packets for students without the internet will be provided.

Food/Nutrition Guidance

The district anticipates being able to support the federal lunch program through "Meals on Wheels", an Ocean County support program, during an emergency closing. Those students/families will be contacted by central office for permission to utilize this support system during a school closure.

Post-Secondary Information

In response to the March 5, 2020 Guidance Regarding Requirements for Public Health-Related School Closure Memo from the New Jersey Department of Education, OCVTS has developed a health-related closure preparedness plan to provide home instruction which will include plans for post-secondary programs. The OCVTS health related closure preparedness plan will follow the guidelines set forth in NJAC 6A:16-10.1 and will be delivered via online instruction. OCVTS recognizes that its post-secondary programs must comply with Title IV policies. As such the district is following the March 5, 2020 guidance set forth in Federal Student Aid Memo from the US Department of Education titled <u>Guidance for interruptions of study related to Coronavirus (COVID-19)</u>. In said memo, the Department of ED states that:

The Department is providing broad approval to institutions to use online technologies to accommodate students on a temporary basis, without going through the regular approval process of the Department in the event that an institution is otherwise required to seek Departmental approval for the use or expansion of distance learning programs. This flexibility only applies to a program during a payment period that overlaps the date of this electronic announcement or the following payment period...

We are also permitting accreditors to waive their distance education review requirements for institutions working to accommodate students whose enrollment is otherwise interrupted as a result of COVID-19. We currently are limiting that permission to distance learning opportunities developed for the purpose of serving students who were already in attendance, but whose attendance was interrupted by COVID-19. Please note that this flexibility is not available for clock-hour courses that lead to licensure if the licensure body will not accept distance learning courses or hours or give credit for them toward the number of hours a student must complete.

We want to make clear to institutions that for Title IV, HEA purposes, 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. We are, however, permitting accreditors to waive those standards for schools implementing distance learning programs solely for the purpose of allowing currently enrolled students to complete a term that is interrupted by COVID-19 closures. To meet the Department's requirements for providing distance education, an institution must communicate to students through one of several types of technology – including email – described under 34 CFR § 600.2, and instructors must initiate substantive communication with students, either individually or collectively, on a regular basis. In other words, 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.

The accreditor for OCVTS is the Middle States Commission. The Middle States Commission on Higher Education has released guidance in its March 9, 2020 Memo RE: Updates Relating to Coronavirus (COVID)-19. In said memo the accreditor states that it will "waive the substantive change requirements for distance education..." The memo provides guidance in regard to distance education:

Distance education: If the institution is not approved to offer distance education programs, describe the temporary measures in place to offer distance education. MSCHE will waive the distance education review requirements in the Substantive Change Policy and Procedures for institutions working to accommodate students whose enrollment is otherwise interrupted as a result of the coronavirus. This waiver applies only to US institutions, per the USDE Guidance.

It is OCVTS's position, given the guidance provided by ED and the OCVTS accrediting body, that its current distance learning plan aligned with the NJDOE requirements, outlined above, meet the criteria for clock-hour courses set forth in by ED and the OCVTS accreditor Middle States.

OCVTS does recognize that ED's guidance does not permit flexibility to those clock-hour courses that lead to licensure if the licensing body will not accept distance learning course or hours. As such, OCVTS is working very closely with the licensing bodies to ensure that the distance learning for those particular programs will in fact provide continuity in the educational program. If a licensure body does not accept distance learning as part of the hour requirement toward licensure, OCVTS will extend the school year for such programs to ensure that students receive the clock-hours necessary to meet the requirements of the licensing body.

In the event that OCVTS temporarily stops offering ground-based classes in order to prevent the spread of COVID-19, the district will provide formal written notice to the Middle States Commission. Formal written notice will update the accreditor on the institutional changes adopted based on the USDE Guidance and those waivers will be emailed as a .pdf, signed by the school Superintendent, and addressed to our Middle States liaison.

OCVTS will continue to monitor the Middle States Association Commission on Elementary and Secondary Schools for updated guidance on temporary school closures relating to COVID-19. As new guidance is released by MSA, OCVTS will modify the temporary distance learning plan and notify its liaison according to the guidance provided.

Pursuant to The US Department of Veterans Affairs (V.A.) email sent to School Certifying Officials sent on March 12, 2020 at 2:48 pm, OCVTS understands the position of the V.A. regarding the process of moving from in-person courses to online courses in the interest of public health due to COVID-19 concerns. As such, if OCVTS closes for up to 4 weeks it will work closely with the V.A. regarding educational programing for students receiving tuition benefits from the GI Bill. If OCVTS closes due to a public health concern, the school will provide an opportunity to extend the school year when the district receives permission to reopen. OCVTS understands that as of March 12, 2020 that the V.A. may discontinue funding for students receiving

GI Bill for OCVTS programs if OCVTS remains open virtually and the State Approving Agency has not approved the program through an online modality. OCVTS is taking this situation very seriously and is attempting to have the district's temporary plan for online learning in the event of a closure due to a public health concern approved by the State Approving Agency for GI Bill funding.