

The BEdA office will post the questions and requests for guidance related to COVID-19 that we receive, as well as the responses.

If you have a question, please email Christy Lowder at clowder@sbctc.edu and she will route it to the correct person on our team. We aim to have a response within 24 hours.

Attendance Tracking	3
Attendance Tracking COVID 19 - accounting for non synchronous hours	3
Attendance Hours	3
Questions regarding tracking student hours	4
Documenting Online Hours	5
CASAS Testing	5
CASAS Testing Concern	5
Campus Closure	6
Proposed campus closure until June	6
I-BEST Testing and Instruction	8
I-BEST Testing Guidance	8
Policy	8
Online I-BEST Instruction	9
I-DEA Questions	10
Utilizing I-DEA Laptops	10
Flexibility in moving Full I-DEA to online	10
First time I-DEA teachers and users	10
2019-20 BEdA Leadership Block Grant	11
2019-20 BEdA Master/IELCE Grant - added 4.8.20	11
Purchasing Technology - ONLY...COVID19 related Expenses	11
Paper vs. Electronic Files	12
Paper vs. Electronic	12
Remote Learning vs. Online Learning	13
Remote vs. Online teaching	13
Documenting Online Hours	14
Classes Face-to-Face vs. Online	14
Classes offered online, Counted as F2F	14
Time and Effort Reporting	15
Time and Effort	15



Tuition Waivers	15
Batch Tuition Waivers for ABE/ESL Students	15
Use of 2019-20 Leadership Block Grant - email from T. Goracke 3.30.20	15
Three-Quarter Rule	17
WABERS+	17
Snapshot date for winter 2020	17
WABERS+ Intake Form	17
Intake Information	18
Comments from OCTAE	18
Serving Out-of-State Students	18

TOC page 2

Attendance Tracking

Attendance Tracking COVID 19 - accounting for non synchronous hours

Q: For classes that are currently coded as face-to-face (web enhanced) and hybrid classes, how do we ensure accurate attendance reporting when we might not meet synchronously for the entire meeting time, should we be using DE to account for the other hours? Here is an example:

Morning classes are 10 credit classes that would normally meet 2.5 hours 4 days a week, and faculty will only meet with the students synchronously for 1 hour each day, how do they track and account for the other 1.5 hours. Should they use a DE approved model to assign time for these hours even though they will be ultimately entered as face-to-face so that we have verifiable hours?

A: Please continue the previous guidance given by BEdA regarding attendance reporting. You could use a DE approved model to assign time if you choose. That may be the easiest. Otherwise you can attach a time to assignments, competency completions, etc. and use that. You just need to have documented how hours were captured. This is very flexible as long as you have a documented process.

Attendance Hours

Q: The scenario is that with K-12 kids at home, it's harder for students to participate in class via Zoom during typical class time. They would prefer to watch/listen to the recording later.

A question came up during my department meeting about whether students who listen/watch the recording of the class later can do an assignment related to their learning after listening/watching and submit it and that this would count as attendance hours.

We're trying to think out of the box and also accommodate the real situations that our students will find themselves in. Many of our students didn't want to return for spring quarter because their kids will be home at least until April 27. ?

A: March 5 - Update on Counting Hours: Coronavirus

Greetings All,

Due to the Corona Virus here in Washington state, OCTAE has approved our office's request to temporarily adjust how we count instructional hours for face-to-face instruction during the crisis. Therefore, we are able to allow all BEdA Programs

experiencing suspended on-site operations and programs suffering a significant drop in attendance to count instructional hours for face-to-face BEdA classes no matter the mode in which students receive instruction.

So, effective immediately, programs that have directives for instruction to continue may count and report those instructional hours in WABERS+. The program should document their method for tracking this instructional time, keep a copy on file, and send a copy to Troy Goracke at the SBCTC BEdA office at their earliest convenience. Programs will receive notice when this temporary adjustment for the crisis ends.

Questions regarding tracking student hours

Q: We are working with students in several different ways, according to their tech skills, preferences, and learning needs.

It's clear to me how to count hours for synchronous modes such as Zoom—simply track the time a student logs in to when they log out of the remote class.

Can we count class time for the following?

- Student texts or calls teacher at X time to make a plan for completing math work from a textbook.
- Student hangs up the call and completes the math work, reaching out to teacher via text or call as needed for support.
- Student texts or calls teacher when the work is finished and debriefs topics learned.

Can we count class time from the start time to the finish time?

A: Allowable During Suspended Operations Only

Attendance: As a point of clarification, any face-to-face class that needs to shift to a distance education instructional model due to suspended operations can count that attendance and enter it as face-to-face. **Programs should document their process and retain in their records for monitoring purposes.** Also, these courses should remain coded as face-to-face classes in SMS and WABERS+ to avoid having Distance Education classes with exclusively face-to-face attendance. Any classes normally offered as Distance Education should follow normal Distance Education policy and process.

Additionally, recorded attendance should not exceed the hours the class would have met face-to-face if operations were not suspended (i.e. class meets 6 hours a week during normal operations, six hours is the most attendance a student can log at a distance).

Documenting Online Hours

- Q:** When you say that you need to receive something from us, is this during monitoring visits or do I need to send an email to someone now with this information. If so, who should I send it too?
- A:** Under the Suspended Operations Guidance, you can count remote learning attendance any way your program and faculty determine are appropriate. As far as documentation goes, you could either have a central location to store documentation (would work best for a uniform program-wide method) or you could ask faculty to put it on each roster they turn in. You don't need to submit anything to us. We determined that was too burdensome on programs so just keep the documentation locally so it is available for monitoring purposes only.

CASAS Testing

CASAS Testing Concern

- Q:** All of the colleges are responding to the placement challenges given that we are not able to access Accuplacer. It seems like the feds really need to embrace some flexibility for basic ed as well, particularly with regards to our local assessment policies during this time. Can you let us know what conversations are being had at the federal level and if we can advocate for some flexibility?
- A:** Testing continues to be a dilemma for all. This has been a hot topic for all of Title II across the nation. We are pressing hard on OCTAE but little movement has happened to this point. Currently there is not an acceptable alternative provided by the feds beyond the increased use of the credit accrual option or to use a virtual testing proctoring service. CASAS has a webinar on Wednesday, we hope to learn how CASAS is positioning themselves to address this.

OCTAE has assured us that the crisis will be considered in any future audits or monitoring. SBCTC is currently working with colleges to use Honor Lock or Respondus Lockdown Browser for virtual proctoring. We are checking with CASAS to see if their testing can be administered through a virtual proctoring option.

OCTAE's Q & A can be found at the following link
<https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-20-3.pdf>. I have pulled the two items below that may help address your question as to OCTAE's guidance.

Q7. What flexibilities will OCTAE allow in terms of assessment, as it relates to education practices? Will States be given the option to conduct virtual pre/post-assessment testing?

OCTAE recognizes that local programs may not be able to conduct in-person testing of students enrolled in distance learning programs during program closures due to the COVID-19 outbreak. If local programs are unable to conduct in-person testing, States may be able to report measurable skill gains (MSG) using other measures available to AEFLA programs under the MSG indicator, such as credit completion or high school completion. The inability to test distance learning students may adversely impact the number of MSGs a State would report in the NRS. States that are experiencing declines in testing rates should put procedures in place to identify students who were not tested due to an inability to conduct in-person testing, so that the impact of the COVID-19 outbreak can be appropriately tracked.

Additionally, States may choose to develop procedures to implement virtual test proctoring. States that choose to use this flexibility must have procedures to ensure that (1) the student who is testing can be properly identified, (2) any approved test (i.e., any test determined suitable for use in the NRS) that is used is properly secured, and (3) the virtual proctor can properly administer the test. Test security measures would require that only secure electronic versions of a test are administered by a virtual proctor and are deemed secure by the test publisher.

Campus Closure

Proposed campus closure until June

Q: Our college has decided to remain closed and operating remotely through June. I'm wondering what thoughts you have about post-testing and even pre-testing officially the new students that we've been bringing on through an alternate assessment.

A: As you all begin to consider how to utilize remote instruction as we move into Spring Quarter, our BEdA team met today to discuss CASAS. While we hope to have information on remote testing options soon, OCTAE, CASAS and we are not there yet.

In the interim, here are some initial possibilities:

Transition as many students as possible to the credit accrual option. Converting upper-level ELA classes to HS+ could allow you to move many more ELA students to this option.

- When possible and if allowed, conduct CASAS testing on-site adhering to social distancing and disinfecting guidance.
- Continue to place students based on local assessments: high school transcripts, guided self-placement, local assessments, etc. and advancing them based on class assessments tied to the standards. You would want to be sure faculty are recording assessments as evidence of advancement. While this does not meet federal requirements, it will allow us to have evidence of how students were placed and advanced during the crisis.

Be sure to put procedures in place to identify/track students who were not tested due to an inability to conduct in-person testing, so that the impact of the COVID-19 outbreak can be appropriately tracked.

Please be assured that students tracked as not being able to be tested due to COVID-19 during this time and the resulting loss of Measurable Skill Gains for these students will not be held against a program for consideration for continuation of grant awards.

In the meantime, we will be working with CASAS and OCTAE to see what other options might be available.

I-BEST Testing and Instruction

I-BEST Testing Guidance

Q: “We received state guidance on using local assessments for placement, as we are unable to provide CASAS right now. We are assuming this applies to IBEST? Our specific situation is we have dev ed students who can't take the CASAS to participate in our support class. Can students just opt in for now and we can CASAS test them once we are able to?”

A: “Yes, this guidance applies to I-BEST as well. You can use the assessment that placed students into developmental education as the assessment that allows them to take the support course. Document this in the student's file.”

Q: “We test all students in an I-BESTed class on the first day of instruction since students arrive in class through several “doors.” Obviously this can't happen in the spring quarter.

We need a way to identify I-BEST students keeping this in mind.

We came up with this method:

- Move students with less than 15 college credits into the IBEST section. AND
- Self-identification- anyone wanting access to supplemental instruction/support.”

A: To review, in trying to determine who is a basic skills student and at what level they are at we suggest temporarily placing students using other measures available to your program that could be delivered online (high school transcripts, local assessments, student interview, etc.). Students would then need to be tested and placement adjusted once normal.

This method needs a demonstration of basic skills needs. For example, what would make a student with less than 15 credits be identified as having basic skills needs? Self-identification, local assessments, etc. could work – again you would want to identify how you would document it as a demonstration of a basic skills need.

Policy

If this affects the testing of new students, we suggest temporarily placing students using other measures available to your program that could be delivered online (high school transcripts, local assessments, student interviews, etc.). Then once students are able to be tested, test results could be used to adjust placement as needed.

Online I-BEST Instruction

Q: I have a clarification question in regards to placing students into I-BEST support classes. We received state guidance on using local assessments for placement, as we are unable to provide CASAS right now. We are assuming this applies to IBEST? Our specific situation is we have dev ed students who can't take the CASAS to participate in our support class. Can students just opt in for now and we can CASAS test them once we are able to?

A: Yes, this guidance applies to I-BEST as well. You can use the assessment that placed students into developmental education as the assessment that allows them to take the support course. Document this in the student's file.

I-DEA Questions

Utilizing I-DEA Laptops

- Q)** We are working through our I-DEA laptop distribution for spring quarter and anticipate having more I-DEA laptops than we will have I-DEA students. Given the current situation of a global pandemic and offering online instruction, would we be able to loan the laptops out to other ESL students? Perhaps those who have progressed from I-DEA to higher levels of ESL?
- A)** Yes, you can absolutely loan computers out to non-I-DEA students during these unprecedented times. All we would ask is that I-DEA students are given first priority for those laptops before being offered to other students. If you have any additional questions about loaning I-DEA laptops, please direct them to Jodi Ruback, jruback@sbctc.edu

Flexibility in moving Full I-DEA to online

- Q:** Programs who typically offer Full I-DEA have asked SBCTC the following questions:
- What flexibility do we have in meeting Full I-DEA requirements as we move online?
 - How should we code students in WABERS+ if we make a shift in the number of modules offered?
- A:** The short answer is yes, there is flexibility in course offerings. Programs that offer Full I-DEA use 8 modules or more per quarter; however, I totally understand that this might not be possible right now for many reasons.

In planning I-DEA instruction for the spring, we would ask that your instructors consider how many modules they may be able to reasonably cover within a quarter. If it is only 4 or 5 for Full I-DEA, that is just fine and completely understandable.

As far as WABERS+ coding goes, it would be perfectly okay to continue to mark students as Full I-DEA this quarter. However, if you wished to change the coding to Tailored I-DEA because of the program shift that would be acceptable, too.

If you would like to review I-DEA requirements during normal instructional times, you can access the information in the [I-DEA Program Requirements](#) document.

First time I-DEA teachers and users

- Q:** We are using I-DEA for the first time to assist with the transition to online/remote learning during the COVID 19 crisis. Should we be marking students in WABERS+?

A: At this time, we are not requiring programs using I-DEA for the first time to identify students as I-DEA in WABERS+. However, if you feel your program is offering I-DEA instruction for spring that meets [I-DEA Program Requirements](#), and would like to identify students in WABERS+, please reach out to Jodi Ruback, jruback@sbctc.edu to discuss your individual program. She will be able to assist you in determining whether or not students should be identified in WABERS+ for spring quarter. We know that this will likely be on a case by case basis depending on your instructional situation.

2019-20 BEdA Leadership Block Grant

Q: From the meeting this morning (4/3/20), did I understand that we *could*, with a budget revision, use our FY20 LBG for technology (laptops for faculty who are delivering instruction remotely)?

A: The 2019-20 Leadership Block Grant (LBG) funds can be spent on stipends or wages for part-time faculty creating materials for remote instruction. The purchase of technology for faculty or staff is not an allowable expense for 2019-20 LBG.

You can use 2019-20 Master Grant funds to purchase technology for faculty working remotely. This would require a budget revision, and funds would be moved to Instruction Goods and Services.

2019-20 BEdA Master/IELCE Grant - added 4.8.20

Purchasing Technology - ONLY...COVID19 related Expenses

Q: Do you think we can use leadership grant to purchase laptops for students to use during COVID19 crisis? We have a lot of students are struggling with online instruction, especially with governors extended order to May 4th.

A: No, technology is not an allowable expense for the FY20 Leadership Block Grant (LBG). You can use FY20 Master Grant funds to purchase laptops for students to use during the COVID-19 crisis. This will require a budget revision in OBIS.

There is some good news, the deadlines to have materials and supplies, including technology, on site by the end of the fiscal year (June 30) has been waived due to the fallout from COVID-19. The new deadline to have materials on site is December 31, 2020. **This is only for COVID related expenses**, and we advise working with you Finance Department on how to appropriately document this.

Paper vs. Electronic Files

Paper vs. Electronic

Q: Does the State Board require paper files on students, including our online application, our in-house placement test (which we are converting to online), and WABERS intake form? Can I assume that we will be allowed to keep electronic files for the next few months? We should be moving to a more electronic capture and filing system anyway, so perhaps this is the catalyst?

A: These records can be stored electronically, we do not require paper forms at any point. However, electronic files must be searchable and auditable.

You will also want to refer to our guidance on esignatures in the BEdA Handbook Reporting and Guidance page ([BEdA Handbook: Local BEdA Reporting and Compliance](#)), Records Retention section (excerpt below in blue font).

Also, intake information on the students, CASAS Testing results once completed, and other information collected during the COVID-19 crisis in any form can be entered into WABERS+/
placed in files when normal operations resume.

Records to be retained include, but are not limited to the following:

- WABERS+ Intake Form (one form each Period of Participation when the student enrolls)
- Attendance (signed original documents with actual number of hours for each day the student participated in a class)
- CASAS pre- and post-test results
- Exception for testing forms
- Documentation of CASAS testing in only one subject
- Registration forms
- Tuition Waivers

Requirements specifically for HS+ read:

CT0401.025 Graduation authorizations

Provides documentation to support the awarding of degrees, diplomas and certificates of completion. May include a copy of graduation application, evaluation of student credits (earned and transferred) and final determination.

Remote Learning vs. Online Learning

Remote vs. Online teaching

Last week at the Friday (3/20/20) COVID meeting, you made a distinction between remote learning and online learning, based on the fact that, in the former, the intention was to go forward with ftf instruction until the emergency hit. This has been a useful definition for me in working with faculty, but our coding folks would like to translate all our remote instruction so that it shows as online.

So, actually two questions—

Q: Is this a formal definition that I can find in some document?

A: This is not a formal definition. This is just the term that was shared in an IC call. Some campuses are using the term to distinguish between online classes that are traditionally face-to-face, and fully online classes which they are referring to as their traditionally fully online/distance classes. The idea, I believe, is that remote classes will go back to face-to-face after the crisis passes.

Q: Would turning remote to appear as our standard asynchronous online have some negative implication you can think of for basic ed or other programs?

A: I would suggest if you are going to run courses as fully online for the entire quarter that you run them as distance courses and count hours as distance. If you plan to transition them to face-to-face when allowed to do so during the quarter, you may want to continue to code them as face-to-face.

Below is the guidance provided March 5:

Due to the Corona Virus here in Washington state, OCTAE has approved our office's request to temporarily count instructional hours for face-to-face instruction during the crisis. Therefore, we are able to allow all BEdA Programs experiencing suspended on-site operations and programs suffering a significant drop in attendance to count instructional hours for face-to-face BEdA classes no matter the mode in which students receive instruction.

So, effective immediately, programs that have directives for instruction to continue may count and report those instructional hours in WABERS+. The program should document their method for tracking this instructional time, keep a copy on file, and send a copy to Troy Goracke at the SBCTC BEdA office at their earliest convenience. Programs will receive notice when this temporary adjustment for the crisis ends.

Documenting Online Hours

Q: Before the spring quarter starts, I just wanted to make sure that I'm doing this "documenting" correctly. The guidance from the State Board is as follows:

"So, effective immediately, programs that have directives for instruction to continue may count and report those instructional hours in WABERS+. The program should document their method for tracking this instructional time, keep a copy on file, and send a copy to Troy Goracke at the SBCTC BEdA office at their earliest convenience. Programs will receive notice when this temporary adjustment for the crisis ends."

When it says, "documenting", does this mean that instructors have to show me how they are accounting for the hours of instruction? So for example, if an instructor does 2 hours in Zoom and then 1.3 hour's worth of work in Canvas, do they have to show me this work and how the different assignments amount to the 1.3 hours?

A: When we ask programs to document how they are tracking remote instruction for f-2-f attendance, we just need to know if they are using teacher verification, learner mastery, a combination, or another method. This documentation of method and how they intend to monitor and reconcile is what we need to receive from programs.

Classes Face-to-Face vs. Online

Classes offered online, Counted as F2F

Q: We got instructions from our campus to make some changes to the way the contracts are built. Is it still OK for us to keep ABE classes as F2F even if they are offered online?

A: Yes. It is a local decision.

See the following guidance from March 5:

Due to the Corona Virus here in Washington state, OCTAE has approved our office's request to temporarily adjust how we count instructional hours for face-to-face instruction during the crisis. Therefore, we are able to allow all BEdA Programs experiencing suspended on-site operations and programs suffering a significant drop in attendance to count instructional hours for face-to-face BEdA classes no matter the mode in which students receive instruction.

So, effective immediately, programs that have directives for instruction to continue may count and report those instructional hours in WABERS+. The program should document their method for tracking this instructional time, keep a copy on file, and send a copy to Troy Goracke at the SBCTC BEdA office at their earliest convenience. Programs will receive notice when this temporary adjustment for the crisis ends.

Time and Effort Reporting

Time and Effort

Q: During the COVID-19 *Stay Home-Stay Healthy* restriction, is there a change as to how Time & Effort needs to work?

A: There are no changes in how Time & Effort would be tracked during the COVID-19 crisis. If employees are still working, they would log their time just as they always have. If they are on some kind of leave, they'd log that as leave (as normal). If they're on leave without pay, they'd log that as leave without pay (as normal).

Tuition Waivers

Q: Normally we have to see some back up (social benefits card like SNAP, for example) to qualify. Some guidance would be appreciated.

A: It is not a requirement that you have to see some back up documentation. The student's signature is enough. If the student is not available for a signature see the WABERS+ area at the end of the Q & A.

Q: How should we be collecting tuition waivers for ABE/ESL.

A: Answer below: Batch Tuition Waivers for ABE/ELS Students

Batch Tuition Waivers for ABE/ESL Students

Q: Is it possible for programs to do batch tuition waivers for our registered students?

A: No. Each student (with the exceptions of I-BEST) will have to have a quarterly tuition waiver on file. This can be completed electronically with the student's email attached as verification if students are not available to supply signatures.

Use of 2019-20 Leadership Block Grant - email from T. Goracke 3.30.20

Due to the cancellation of our BEdA face-to-face trainings and with permission from OCTAE, we are temporarily relaxing some of the rules around Leadership Block Grant (LBG) to better allow providers to expend these funds. With this temporary expansion of allowable uses for the LBG, please remember to encumber funds from this year's grant to cover Rendezvous registrations



for your program. And please remember that you will need to update your LBG budget in OBIS for any budget changes.

The allowable changes or 2019-20 LBG expenditures during the novel coronavirus/COVID19 emergency are:

1. Payment of stipends or wages for part-time faculty developing on-line/remote curriculum
2. Payment of registration for non-SBCTC/BEEdA supported trainings for faculty and staff

These changes are effective immediately.

Again, please remember that registration for Rendezvous 2020 can be paid for out of 2019-20 LBG.

Three-Quarter Rule

Q: In your email on March 5th on guidance about suspended operations, you mentioned that programs can choose to not count the quarter with suspended operations as one of the 3-quarter counts, but if we use this option, programs will want to document this. What would be the best way to document this?

A: The college can determine how they track this but documentation should include at minimum:

- A statement of the reason with quarter and dates associated
- A list of students who have been awarded the exception
- A signature of the Vice President of Instruction or Executive Director

This exception will apply to all BEdA students enrolled in the quarter indicated. This exception is only available to programs with suspended operations due to COVID-19 and will be monitored by the SBCTC BEdA Department.

WABERS+

Snapshot date for winter 2020

Q: Will the Winter quarter snapshot be extended or pushed back from the April 9 date? If not are programs allowed to take records home to work remotely?

A: The Winter Quarter snapshot date will not be modified at this time, please do the best you can with getting data entered. Documents, data, etc. needed to work remotely should follow the guidance from your agency as to what documents are allowed to be taken off site and what security required.

WABERS+ Intake Form

Q: We are planning on using a remote intake process. This means that we will be asking the students the intake questions via a phone interview. Is it okay to ask the prospective student to give their consent to sign the document on their behalf? If so, is there nomenclature that we should use?

A: Please put the note "Phone interview" in the student signature line and the person conducting the interview can print and sign their name below.

Intake Information

Q: I'm wondering whether we will be allowed to collect information for WABERS+ on students remotely and then enter the information into WABERS+ when we're back on campus?

A: Intake information on the student and CASAS Testing results once completed can be entered into WABERS+ when normal operations resume.

For more information see [March 5th guidance on suspended operations](#).

Comments from OCTAE

J. Kerr to Cheryl Keenan, Director-Division of Adult Education and Literacy, Office of Career, Technical, and Adult Education (OCTAE): April 1, 2020

Jon: *We are now having several colleges deciding to remain closed and operating remotely through June. This means that testing will continue to be a real challenge. We do use the credit accrual option and have put other temporary options in place until testing can resume or be moved to virtual proctoring. We appreciate your understanding. Stay healthy.--Jon*

Cheryl: *Good to hear from you. I am not surprised by decisions on extended closings. I think we will see more and more of them. Commonwealth of VA is on mandatory closures and stay at home orders until June 10. I think testing is the least of our worries. We will work through it. We hope to pull together a short State Leadership Consultation call next week to hear more about how things are progressing in some States. Stay tuned.*

Serving Out-of-State Students

Q: Are Title II providers in one state able to serve Title II eligible students residing in other states online?

A: No, Title II funds cannot be used to provide programming to out of state students.