



# Rewriting the Rules and Practices of Administrators in Community Colleges After COVID 19: Part 1

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## Two-Part Series

# We Are in This Together!



**Steven Andelson**



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## ***A Special Message From Our Founding Partners***

Thank you for your continued support of AALRR. It has been our pleasure to serve ACCCA for over 20 years. You are the backbone of the education community. As administrators, you are challenged every day to make tough decisions that impact the success and achievements of our students. It is our hope that together we can enhance our understanding of issues affecting student success and achievement so we can lead the way to better address the needs of California's diverse and underserved students.

Thank you for your dedication and professional investment in our students and for all you do in support of California Colleges. ***We are in this together!***

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# Meet Today's Team



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# Agenda

- Managing a Remote Workforce to Serve Students
- Telecommuting Policies
- Managing Employee Leaves
- EEOC COVID-19 Guidance





# EXECUTIVE ORDER N-33-20 (March 19, 2020)

- “order[s] all individuals living in the State of California to stay home or at their place of residence except as needed to maintain continuity of operations of . . . federal critical infrastructure sectors”
- Colleges are considered “critical infrastructure”
- Exemptions for educators and other workers supporting public and private K-12 schools, colleges, and universities for purposes of facilitating distance learning or performing other identified essential functions, if operating under rules for social distancing
- Districts should assess which employees are “essential” within the meaning of the Governor’s Order

# PUBLIC HEALTH ORDERS

CDPH GUIDANCE (March 16, 2020) advises isolation at home for:

- Over 65 years of age
- “Serious chronic medical conditions”
- Compromised immune systems
- “This guidance does not apply to people who work in essential services”

## LOCAL PUBLIC HEALTH ORDERS

- May be more restrictive

# COVID-19 Telecommuting Policies

- To ensure equity in work and expectations, consider implementing a clear telecommunicating policy during campus closures due to COVID-19 emergency
- The policy should include specific expectations and guidelines for staff telecommuting, while recognizing that there may be some individual circumstances requiring modifications
- Different departments may have different needs
- Existing policies, CBA and/or bargaining obligations may apply, subject to district's right to take action based on business/operational necessity and/or management rights reserved in CBA – coordinate with HR



# COVID-19 Telecommuting Policies

- Pay and benefits while telecommuting
- Job duties – what's new, what's the same, what's temporary, what's subject to change
- Established work hours
- Overtime procedures for nonexempt employees
- Requirements for level and means of communication and employee availability (with respect to both students and supervisor/coworkers)
- Requirements for reporting/use of leave if employee will be unavailable
- Expectations for professional interaction with students/public/coworkers

# COVID-19 Telecommuting Policies

- Requirements to stay away from campus
- Requirements for reporting to campus if/when directed
- Any special equipment to be provided by district
- Acceptable use policy/information security
- Required/permissible/impermissible uses of district-provided hardware/systems
- Permissible/impermissible uses of personal devices/accounts
- Expense reimbursement (Educ. Code 87032)
- Availability of disability accommodation
- Requirements for safety/reporting of work-related injuries

# Acceptable Use Policies

Each AUP is unique and addresses the individual need within a district; however, this is an appropriate time to review your existing AUP and ensure that several key elements are included, such as:

- No employee expectation of privacy when using district IT
- Prohibitions on sharing passwords/using another's account
- Limits on use of technology for non-work purposes
- Limits on websites that can be visited
- Restrictions on copying software
- “Civility” policy or appropriate language guidelines

# Assessing Home Set Up Capabilities

- Employee's home workspace should be appropriate and safe
  - Injuries sustained by an employee in a home office location and in conjunction with their regular work duties may be covered by workers' compensation
- Employees should be advised that they are expected to abide by good network security measures, including regular password maintenance and any other measures appropriate for the job and the environment
  - Employees should also be advised to inform the district if any issues, including potential unauthorized access to information, are experienced while telecommuting

# Tracking and Monitoring Employee Work Time

- Have clear expectations
  - Establish employees' expected hours of work
  - Establish how employees will check-in with supervisors
  - Establish limits on OT and requirements for advance authorization
  - Establish any new or altered duties
- Hold employees (including supervisors) accountable for expectations

# Virtual Meetings

- Ensure restrictions are **ON**
  - Utilize “waiting room” feature
  - Require passwords to participate
  - Schedule using the District calendar
- Confidentiality of videoconferences/teleconferences
- Grooming/appearance on videoconferences
- Video/teleconference meeting etiquette



# Reimbursement Considerations

- Education Code section 87032
  - The governing board of any community college district shall provide for the payment of actual and necessary expenses of any employee of the district incurred in the course of performing services of the district, whether this occurs within or outside the district

**If possible, reimburse “actual and exact” usage. If not, consider alternative methods, such as:**

**Monthly Stipend  
based on Board  
Policy or MOU**

**Based on or  
determined by  
actual usage**

**Fixed Percentage  
of employee’s  
salary/rate of pay**

# Employee Leave Scenarios

- Some employees are working only from home
- Some employees have job duties that the District has determined it is truly essential to be performed on-site rather than at home
- Some employees are working from home some of the time, and working on site some of the time
- Some employees have been sent home with no work for now, because there is no work for them to do at home. Such employees may be required to perform other duties as the District may identify (subject to bargaining obligations and the District's right to take action based on business/operational necessity and/or powers reserved to the District in its CBAs)
- Some employees were already on leave when campuses closed

# FFCRA – Emergency Paid Sick Leave

- Applies to public agency employers
- No employee eligibility requirements (limited exception for healthcare providers and emergency responders)
- Up to 80 hours paid leave, prorated for part-time
- Pay rate depends on reason for leave
  - maximum of \$511 per day/\$5,110 aggregate [reasons 1, 2, 3] -OR-
  - maximum of \$200 per day/\$2,000 aggregate [reasons 4, 5]
  - Other full-paid leave may apply under Educ. Code or Labor Code
- Employee can use emergency paid sick leave **before** using any other paid leave provided by the employer
- 6 qualifying reasons

# FFCRA – Emergency Paid Sick Leave

6 reasons

- (1) subject to a Federal, State or local quarantine or isolation order related to COVID-19
- (2) advised by a healthcare provider to self-quarantine due to concerns related to COVID-19
- (3) experiencing symptoms of COVID-19 and seeking medical diagnosis
- (4) caring for an individual who is subject to an order as described in Reason #1 or has been advised as described in Reason #2
- (5) caring for a son or daughter whose school or childcare is closed or unavailable due to COVID-19 precautions
- (6) “substantially similar condition” as determined by federal agencies

## FFCRA – Expanded FMLA

- Adds to existing FMLA by establishing, on a temporary basis, an employee's childcare needs due to school or paid childcare closure as a new qualifying reason for taking up to 12 workweeks of FMLA leave
- Special eligibility criteria for employees taking FMLA leave for this new qualifying reason: Employee is eligible if employed for at least 30 days
  - Regular FMLA eligibility requirements (1,250 hours, employed 1 year) do NOT apply
- First 10 days (2 workweeks) unpaid unless the employee substitutes vacation, personal leave, or sick leave (including Emergency Paid Sick Leave).
- Remainder of the leave (10 workweeks) is paid at not less than 2/3 pay, which shall not exceed \$200 per day and \$10,000 total
- Use of Expanded FMLA counts against regular annual FMLA entitlement

# Sources of Employee Leave Rights

- Families First Coronavirus Response Act (FFCRA)
  - Effective April 1 – December 31, 2020
  - Emergency Paid Sick Leave
  - Expanded FMLA
- Existing Leave Laws (Educ. Code, Labor Code, FMLA/CFRA, etc.)
- Existing CBA
- MOU
- Don't forget ADA/FEHA (disability accommodation)



# Employee Leave Scenarios

- All employees have leave rights but are otherwise accountable to work unless leave has been approved
- Approval/denial of leave depends on specific reason for request – manage requests according to particular circumstances and requirements of FFCRA and applicable policies/CBA/MOU
  - Employee working from home who is not experiencing illness but who is subject to isolation order/medical advisement?
  - Employee working from home who is experiencing illness?
  - Employee working on-site who is not experiencing illness but who is subject to isolation order/medical advisement because over 65 but otherwise healthy?
  - Employee working on-site who is not experiencing illness but who is subject to isolation order/medical advisement due to underlying medical condition/compromised immune system?

# Dealing with Potential COVID-19 Cases

- If an employee is concerned that he/she may be infected with or have been exposed to coronavirus, to whom should the employee report this?
- If an employee is concerned that someone else in the workplace may be infected with or have been exposed to coronavirus to whom should the employee report this?
- Confidentiality: who can or should know of potential or confirmed cases?
- Who should advise the employee of potential leave rights and other relevant employer policies?
- What is the external messaging? How to anticipate and respond to concerns from other employees, students, and community?

# EEOC Guidance on COVID-19 Pandemic

- Inquiries to employees and applicants about COVID-19 symptoms
- Exclusion of employees from the workplace due to symptoms
- Temperature testing
- Confidentiality of medical information
- Doctor's clearance to return to work (consider also local public health orders)
- Employer requirements for infection control, use of protective equipment
- Reasonable accommodation
- Preventing Workplace Harassment and Discrimination
- [https://www.eeoc.gov/eeoc/newsroom/wysk/wysk\\_ada\\_rehabilitaion\\_act\\_coronavirus.cfm](https://www.eeoc.gov/eeoc/newsroom/wysk/wysk_ada_rehabilitaion_act_coronavirus.cfm) (updated April 23, 2020)

# Support For Students



# Excused Withdrawal

## ***California State Chancellor's Executive Order 2020-01 March 20, 2020***

Withdrawal from classes and requests for refunds - Students who withdraw because of the current crisis will receive an excused withdrawal (EW) on their transcripts, which will not count against academic progress requirements. The order temporarily waives requirements for districts to obtain approval from the state Chancellor's Office to refund enrollment fees to these students.

# Grading /Academic Instruction Policy Changes

## **California State Chancellor's Order 2020-02 March 27, 2020**

- Students may elect pass/no pass evaluation in a course after the first 30 percent of the term.
- If a student gets NP, that “grade” will not be considered in probation and dismissal procedures.
- Student may repeat a course they were enrolled in during March 4<sup>th</sup> declaration of emergency if the method of instruction was impacted due to the District's response to COVID-19
- Districts need not request approval from State Chancellor to change term of Spring 2020 academic year



# Attendance Accounting

## **California State Chancellor's Office, Vice Chancellor, College Finance and Facilities Planning Memorandum on Attendance Accounting dated April 16, 2020**

Title 5 CCR 58146 - (a) An emergency conditions allowance may be provided, subject to approval by the Chancellor, to a district effected by an emergency or extraordinary condition. Section 58146 includes an epidemic in the definition of an emergency condition.

# Attendance Accounting Methods

- **Weekly Student Contact Hour** (WSCH) (Title 5, Sections 58003.1(b), 58004, 58020)
- **Daily Student Contact Hour** (DSCH) (Title 5, Sections 58003.1(c), 58004, 58020)
- **Positive Attendance/** Actual Hours of Attendance - (PA) (Title 5, Sections 58003.1(d), 58006, 58008, 58022)
- **Alternative Attendance** Accounting Method = applies to Credit distance education courses not using other attendance accounting procedures and Independent
- Study/Work Experience Education Courses (Title 5, Section 58003.1(f)(1)). Also applies to noncredit courses conducted under either distance education or independent study (Title 5, Sections 58003.1(f) (2). See also Title 5, Sections 58009, 58009.5, 58020)
- Every class, to be reported for State apportionment, must be assigned a specific and single attendance accounting method as prescribed by Title 5 Section 58003.1

# Attendance Accounting

- Distance Education Courses – Alternative Education procedure used to calculate FTES. (Title 5 CCR § 58003.1(f))
- Courses Converted to Distance Education due to COVID-19 that apply the weekly and Daily Census attendance accounting may continue doing so.

# Attendance Accounting

- Positive Attendance courses that are converted to a **synchronous** distance education should continue to apply positive attendance procedure instead of converting to Alternative Attendance Accounting Procedure.
- Positive Attendance courses converted to **asynchronous** distance education should use the Alternative Attendance Accounting procedures. However, a district may compute the units of FTES they believe would have been achieved had the courses not been converted to distance education. (Title 5 § 58146(c))

# Suggested Methods for Computing FTES

- Calculate the average contact hours generated in the prior three course offerings in the same course or a similar course;
- If the course has had inconsistent enrollment or is new, data may be used from a similar course with an explanation of why the course was chosen as similar.
- Reasonable estimation methods may be used provided that sufficient justification and documentation are submitted in support of the methodology.

# Extended Opportunity Programs and Services

## ***California State Chancellor's Office Executive Order 2020-03 dated April 6, 2020***

- Grant award limit not to exceed \$900 and total award amount not to exceed \$1800 - Suspended (Title 5 § 56254(a)(c))
- Disbursement of grant award equally among terms in the college year – Suspended (Title 5 § 56254(d))
- Emergency Loan not to exceed \$300 in single academic year and loan to be repaid within the academic year – Suspended (Title 5 § 56258 (a))
- Supplemental costs not to exceed 10% of a colleges EOPS allocation – Suspended (Title 5 § 56295(a))
- Requirement for Chancellor approval of request to purchase hardware and/or software – Suspended (Title 5 §56295 (b))



# Resources for Students

- Internet Hot Spot – Foundation for California Community Colleges  
[https://communityconnectionssjc.org/programs/details/foundation\\_for\\_california\\_community\\_colleges\\_college\\_buys/](https://communityconnectionssjc.org/programs/details/foundation_for_california_community_colleges_college_buys/)
- Computer Hardware and Software - <https://foundationccc.org/CollegeBuys>
- Food Resources –
- [California Association of Food Banks](#)
- [Feeding America](#)
- [CalFresh](#)
- [The Social Care Network](#)
- [211 services](#)

# Waiver of Student Fees

- **Mandatory v. Discretionary**

- CCDs are obligated to “establish student fees as it is required to establish by law, and, in its discretion, fees as it is authorized to establish by law.” (Ed. Code § 70902(b)(9).)

- **Mandatory:**

- Enrollment fees are mandatory and cannot be waived (Ed. Code § 76300; CCCCCO Legal Opinion 11-03) with limited exceptions:
  - BOG Waiver (Ed. Code § 76300)
  - AB 540 (Ed. Code § 76300.5)
  - Victims of serious crimes (Ed. Code § 76301)
  - California College Promise (Ed. Code § 76396.3)
- Enrollment fees may be refunded if students withdraw due to the current situation.

<https://www.cccco.edu/-/media/CCCCO-Website/Files/Communications/COVID-19/fs-20-01-covid-19-attendnace-accounting-guidance-related-to-course-conversions-to-distance-dducation.pdf?la=en&hash=ABA1095DF41F573D385A573858C0B5E5D8F7E0F1>

# Student Fees, Cont'd

## – **Discretionary:**

- Health fees (Ed. Code 76355)
- Parking fees (Ed. Code 76360)
- Transportation assessment (Ed. Code 76361)
- Instructional Materials fees (Ed. Code 76365)

These fees may be waived within the District's discretion.

# CARES Act (Federal Stimulus) — March 27

- Provides \$30.75 Billion for education.
  - **46.3% Higher Education Emergency Relief Fund**
    - **7.5%** for grants, including Strengthening Institutions Program and Hispanic-serving Institutions
    - **2.5%** for Institutions with “greatest unmet needs related to coronavirus”
    - **90% (\$12.56 Billion)** goes to Student and Institutional Aid to “**prevent, prepare for, and respond to coronavirus**”
  - **Two Major Programs:**
    - **Emergency financial aid grants** (at least 50% of funds) (DOE Letter — April 9)
    - **Institutional aid** (not more than 50% of funds) (DOE Letter — April 21)

# Emergency Financial Aid Grants to Students (\$6.28B)

- **April 9 Letter (USDOE)**
- <https://www2.ed.gov/about/offices/list/ope/caresactgrantfundingcoverletterfinal.pdf>
  - “The CARES Act provides institutions with **significant discretion** . . . Each institution may develop its own system and process for determining how to allocate these funds”;
  - “May [distribute] funds to all students or only to students who demonstrate significant need”;
  - “**The only statutory requirement** is that the funds be used to cover expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student’s cost of attendance), such as food, course materials, technology, health care, and child care.”
  - Suggests \$6,195 limit per student (based on maximum Federal Pell Grant)
  - **Funding Certification/Agreement**: Institution “shall not use the advanced funds to reimburse itself for any costs or expenses including . . . costs associated with significant changes to the delivery of instruction due to the coronavirus and/or any refunds or other benefits that [the institution] previously issued to students.”

# Emergency Financial Aid Grants to Students, Cont'd

- **April 21 FAQ — US Department of Education**

<https://www2.ed.gov/about/offices/list/ope/heerfstudentfaqs.pdf>

- Clarifies rules applicable to emergency financial aid grants.
- Imposes strict eligibility requirements
- Funds may be used only for eligible expenses incurred on or after March 27, 2020

# Emergency Financial Aid Grants to Students, Cont'd

- **Eligible Students (per April 21 FAQ)**

- “Only . . . students who are or could be eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965.”
- Eligibility for Section 484 of the Higher Education Act includes the following:
  - Filed a FAFSA or eligible to file a FAFSA
  - US Citizen or eligible noncitizen (Permanent Resident or noncitizen in the US with the intent to become a US citizen or Permanent Resident with evidence from the Immigration and Naturalization Service)
  - Valid Social Security number
  - Registration with Selective Service (if male)
  - High school diploma, GED, or completion of high school in an approved homeschool setting

# Emergency Financial Aid Grants to Students, Cont'd

- **Ineligible Students (per April 21 FAQ)**

- Students enrolled exclusively in online programs on March 13, 2020
- Incarcerated students (except case-by-case review for students in Second Chance Pell Experimental Site Initiative)
- DACA students
- Undocumented students
- Dual enrollment students



# Emergency Financial Aid Grants to Students, Cont'd

- **Eligible Expenses (Per April 21 FAQ)**

- The only eligible grants are:
  - For authorized expenses: food, course materials, technology, health care, and child care.
  - To students
  - Made March 27, 2020 or later

- **Ineligible Expenses (Per April 21 FAQ)**

- Emergency aid to students cannot be used to:
  - Reimburse districts for fees already refunded or waived. Money must go directly to students.
  - Reimburse districts for costs of information technology hardware and related equipment provided to students.
  - Pay outstanding/overdue student bills to institutions.
  - Make Federal Work-Study payments.

# Emergency Financial Aid Grants to Students, Cont'd

- **Reporting Requirements**

- Report 30 days after agreement and EVERY 45 days thereafter:
  - HOW grants were distributed
  - AMOUNT of each grant
  - How the amount was CALCULATED
  - Any INSTRUCTIONS/DIRECTIONS to students

- **Documentation Requirements**

- Document that the institution “has continued to pay all of its employees and contractors during the period of any disruptions or closures to the greatest extent practicable, explaining in detail all specific actions and decision relating thereto.”

# Emergency Financial Aid Grants to Students, Cont'd

- **How to Pay:**

- Check
- Electronic Transfer Payment (EFT)
- Debit cards
- Payment apps that adhere to Department of Education requirements for paying credit balances to students
- Cannot use credit card which can only be used on campus or at specific retail outlets affiliated with the institution.
- No deductions for charges, fees, or other amounts owed to the institutions.

- **Payout Date:**

- Funds must be used within 1 year from date of application

# Emergency Financial Aid Grants to Students, Cont'd

- **Are emergency financial aid grants taxable?**
  - ACE Letter
  - Consider Internal Revenue Code Section 139 (Disaster Relief Payments)
  - Consult legal counsel

# Institutional Aid (\$6.28 Billion)

- **April 21 — US Department of Education**

<https://www.ed.gov/news/press-releases/secretary-devos-delivers-6-billion-additional-grant-funding-support-continued-education-americas-colleges-universities>

- **DOE Promises More Flexibility In Use of Institutional Aid (April 21 FAQ)**

- “Institutions will have more flexibility in the use of the [Institutional Aid funding]”

- **Application/Reporting/Dates:**

- Application linked from US DOE April 21 Letter
- Must complete application for Emergency Financial Aid Grants to students first
- Funds must be used within 1 year from date of application.
- Quarterly reports
- Additional reporting may be required

# Institutional Aid (\$6.28 Billion), Cont'd

- **Allowable Uses:**

- Expand remote learning programs
- Build IT capacity
- Train faculty and staff to operate in a remote learning environment
- Additional emergency cash grants for students
- Reimbursing institutional expense of refunding certain student expenses (housing, food, other services) and providing technology (hardware, software, internet connectivity) (per Application form)

- **Prohibited Uses:**

- Payment to contractors for the provision of pre-enrollment recruitment activities, including marketing and advertising
- Endowments
- Capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship
- Salary/cash/benefits for Senior Administrators

# Additional Aid — CARES ACT

- Institutional Matching Requirements: Waived for Federal Work-Study and Grants (FSEOG)
- Unexpended Work Study \$\$: Can transfer to FSEOG (Student Aid)
- Federal Work-Study Payments:
  - Students can be paid even if not working.
  - One year limit
- Semesters Impacted By COVID-19: Not Counted
- Repayment of Title IV Funds: Waived for students withdrawing as a result of COVID-19
- Study Abroad Programs: Can continue remotely from home.

# CalWORKS Work-Study

- California Department of Social Services (CDSS) authorizes continued payment of District's 75% share of CalWORKS Work-Study through June 30, 2020. Cannot pay employer's 25% share.
  - CDSS Notice - [https://mcusercontent.com/73901133dd7ea1a5581344daf/files/df666b12-a499-4412-a9d8-11c6b595f6a6/ACWDL\\_3\\_30\\_20CALWORKS.pdf](https://mcusercontent.com/73901133dd7ea1a5581344daf/files/df666b12-a499-4412-a9d8-11c6b595f6a6/ACWDL_3_30_20CALWORKS.pdf)
  - CCCCO Guidance - <https://www.cccco.edu/-/media/CCCO-Website/Files/Communications/COVID-19/es-20-14-emergency-guidance-for-calworks-memo.pdf?la=en&hash=EC3A24F587A485D3A222D8260063CED300EE2B94>



# Undocumented Students

- **\$500 Relief Payment For Undocumented Adults**

“California’s \$75 million Disaster Relief Fund will support undocumented Californians impacted by COVID-19 who are ineligible for unemployment insurance benefits and disaster relief, including the CARES Act, due to their immigration status. Approximately 150,000 undocumented adult Californians will receive a one-time cash benefit of \$500 per adult with a cap of \$1,000 per household to deal with the specific needs arising from the COVID-19 pandemic. Individuals can apply for support beginning next month.”

<https://www.gov.ca.gov/2020/04/15/governor-newsom-announces-new-initiatives-to-support-california-workers-impacted-by-covid-19/>

# Veteran Students – GI Bill

- **March 21, 2020 – Senate Bill 3503**

- Authorizes the Veteran's Affairs to continued GI Bill payments uninterrupted in the event of national emergencies, including COVID-19 Pandemic
- Authorizes education benefits for in-person courses converted to online platforms
- Guarantees veteran students will continue to receive their same monthly housing allowance until December 21, 2020 or until the student's school resumes normal operations

# Homeless Students – California's Operation Roomkey

- **April 3, 2020 – Governor Newsom announced the initiative to help homeless Californians**

- Students facing homelessness may be eligible to secure temporary housing during COVID-19 Pandemic
- Priority is given to individuals who have test positive or been exposed to COVID-19, and medically vulnerable individuals
- Students should contact their Continuum of Care Provider for additional information. A list of Continuum Care Providers is available here - [https://www.bcsb.ca.gov/hcfc/documents/coc\\_poc.pdf](https://www.bcsb.ca.gov/hcfc/documents/coc_poc.pdf)

<https://www.gov.ca.gov/2020/04/03/at-newly-converted-motel-governor-newsom-launches-project-roomkey-a-first-in-the-nation-initiative-to-secure-hotel-motel-rooms-to-protect-homeless-individuals-from-covid-19/>

# Thank You

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