



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING


GRETCHEN WHITMER
GOVERNOR

MICHAEL F. RICE, Ph.D.
STATE SUPERINTENDENT

MEMORANDUM

DATE: March 30, 2020

TO: Local and Intermediate School District Superintendents
Public School Academy Directors

FROM: Dr. Scott M. Koenigsknecht, Deputy Superintendent
P-20 System and Student Transitions 

SUBJECT: Career and Technical Education Requirements During COVID-19 Closure Memo

Due to the COVID-19 state of emergency, the governor ordered the closure of all schools in the state as of Monday, March 16, 2020. This includes all state-approved career and technical education (CTE) programs directly run by intermediate school districts (ISDs) and local education agencies.

This memo includes an updated Frequently Asked Questions (FAQ) that have been developed and posted to the [MDE website](#) to clarify CTE requirements during this unprecedented situation. This FAQ will be updated as necessary, as the situation evolves.

For questions regarding this memo, please contact either Dr. Jill Kroll, OCTE Supervisor at krollj@michigan.gov or Dr. Joanne Mahony, OCTE Supervisor at mahonyj@michigan.gov.

Attachment

cc: Michigan Education Alliance

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Federal Perkins

1. Is it permissible to continue paying Perkins-funded staff members during the school closure with Perkins Grant funds?

Yes.

2. Can staff who are normally assigned to assist students be reassigned as needed to support regional priorities?

Yes. It is permissible to continue paying Perkins-funded staff members during the school closure with Perkins Grant funds in a manner consistent with district policies.

3. Are regions permitted to carry over Perkins funds?

No. Any unexpended funds will be added to the 2020 – 2021 formula.

4. Many Perkins-funded activities and salaries will be affected due to this extended closure. May the regions make amendments to the 2019 – 2020 Perkins Grant?

Yes.

5. How should districts handle the plan to purchase equipment and materials?

Equipment and materials must be delivered within the current grant year.

6. May districts donate unused/unopened gloves and masks purchased with federal Perkins funds from our health programs to local agencies in need right now?

Yes. Districts may donate unused and unopened supplies to local health agencies in this time of crisis, but should act in a manner consistent with district policies.

7. Will there be extensions for 2020 Perkins Grant Amendments?

No. Please submit your amendments as you complete them so you can spend the funds. OCTE staff are working remotely and will review and approve these amendments in a timely manner.

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8. May we request reimbursement for all expenditures up until this time?

Yes. MDE recommends regions drawdown their reimbursements on a monthly basis.

9. Since regions may continue compensating staff, should regions continue monthly drawdowns through the duration of the grant?

Yes.

10. Will the Perkins grant application deadline for FY 2021 be extended?

If you can meet the April 1 due date, please do so. If you are unable to meet that deadline, please contact your Perkins Team Leader in writing and request an extension. As we proceed over the next few weeks, and receive guidance from state and federal leadership, we will keep you apprised of any changes.

11. The Regional Workforce Development Board (WDB) and Career Education Advisory Council (CEAC) meetings have been cancelled. May the region submit the Perkins application without these approvals and obtain WDB CEAC review by July 1, 2020?

Yes. Submit your Perkins application and contact your Perkins Team Leader regarding this matter. Please submit required approvals by July 1, 2020.

12. What is the status of credential assessments?

Based on information currently available, regions are required to administer credential assessments. The U.S. Department of Education (USED) held a conference call on Friday, March 20, 2020 and this FAQ will be updated when MDE receives written USED guidance.

- Remember that Core Performance Indicator 5S1 is reported the year a Concentrator leaves school so the only Concentrator credential data that will be affected will be for Concentrators who graduate this year.
- Concentrators who left school in 2019 – 2020 will be reported for 5S1 for 2020 - 2021.
- Districts may report industry credentials for students until August 31; therefore, students who take credentialing exams in the summer will be counted.
- Districts may report credential data until August 31 in the year in which the student graduates.

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- There may be some impact on the 2020-2021 district, region, and state Core Performance Indicator (CPI) 5S1, but at this time the impact is unknown. Please refer to the guidance on the [Completer definition for 2019-2020 posted on the OCTE website](#).
 - This guidance is subject to change based on direction from USED.
13. The region budgeted funds for credential assessments that were scheduled to take place in the spring. Is the region allowed to submit an amendment to expend these funds on another Perkins-approved activity?

Yes. Each region must have approved activities and a budget for all CPIs. All amendments must be approved PRIOR to the expenditure of funds.

14. Students may not have been provided full instruction necessary to perform well on the assessment. What should we do to address this instructional concern?

Upon return from the school closure, districts may choose to provide out-of-school time instruction to support student learning in a manner consistent with district policies. Districts may report credential data until the August 31 in the year in which the student graduates.

61.a1 and 61b State School Aid

1. May the districts compensate employees who are currently funded through Added Cost Section 61.a1 program improvement?

Yes.

2. May districts donate unused/unopened gloves and masks purchased with state School Aid Section 61.a1 funds from our health programs to local agencies in need right now?

Districts may donate unused and unopened supplies to local health agencies in this time of crisis, but should act in a manner consistent with district policies.

3. Are districts permitted to carry over Added Cost Section 61.a1 funds?

No. However, this may change this at some point in time.

4. Are districts permitted to carry over 2019 – 2020 Section 61b funds?

Yes.

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5. Are districts permitted to carry over 2018 – 2019 Section 61b funds?

No.

Reporting Requirements

1. Will reporting timelines be adjusted and/or reports eliminated?

We are unable to provide further guidance regarding report timelines at this time.

2. Enrollment, certification and grade reporting – how will state School Aid Section 61.a1 Added Cost for next year be calculated if CTEIS reporting is delayed or incomplete?

We are unable to provide further guidance regarding state School Aid Section 61.a1 Added Cost and Perkins Core Performance Indicator (CPI) reporting at this time. As we receive guidance from state and federal leadership, we will keep you apprised of any changes.

CTE Programs

1. Is the CEPD 20% program review required?

CEPDs are still required to review and submit documentation on a minimum of 20% of programs. Teachers who are working remotely could complete this work in accordance with school district policies and union contracts. Considering the work regions already completed with the CLNA this year, CEPDs may want to target reviews to the areas of greatest concern.

2. Are programs still required to report completion of work-based learning (WBL) in Navigator?

Yes. Work-based learning is a required component of a state-approved CTE program. With the COVID-19 state of emergency school closure, MDE realizes that many of these planned activities may not have taken place. Teachers should still document the completed WBL experiences in which students participated during the time school was in session and note any planned experiences that were impacted by closure.

3. Are programs still required to report completion of student leadership in Navigator?

Yes. Student leadership is a required component of a state-Approved CTE program. With the COVID-19 state of emergency school closure, MDE realizes

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that many of these planned activities may not have taken place. Teachers should still document the completed student leadership experiences in which students participated during the time school was in session and note any planned experiences that were impacted by closure.

4. May the second CTE program advisory committee meeting requirement be removed to support social distancing?

Yes. State-approved CTE programs will only be required to hold one program advisory committee meeting for the 2019 -2020 school year. Teachers are encouraged to hold the second meeting through a virtual format, if possible.

CTE Programs CIP Specific: Automotive

1. How do I handle the accreditation requirements of a state-approved CTE ASE automotive program (i.e. hands-on instruction, application renewals, entry-level certification testing, etc.)?

The ASE Education Foundation has created a Coronavirus Update web link that provides directions on how to handle an accredited ASE automotive program during the COVID-19 pandemic. This information encompasses all **CIP Codes: 47.0604 - Automotive Technician, 47.0603 – Collision Repair Technician, and 47.0613 – Medium/Heavy Truck Technician** programs. Log online to ASE Education Foundation Corona Virus Update at: <http://aseeducationfoundation.org/coronavirus>.

CTE Programs CIP Specific: Cosmetology

1. Due to the mandatory school closures, our current cosmetology students won't graduate from the program before we are expecting our new incoming students in June. Is there any discussion of waiving any hours or minimum practical applications (MPAs), especially for students who have almost completed all the curriculum but just need to finish hours?

No. The State Board of Cosmetology establishes these requirements. We recommend that you begin planning to find ways for students to finish their hours and MPA requirements after the closure requirement is lifted.

2. Are CTE state-approved cosmetology students eligible to earn clock hours and minimum practical applications (MPAs) through an online learning platform?

The State Board of Cosmetology laws and rules do not allow for students to earn cosmetology hours off-campus or outside a school of cosmetology. Students must be on location at the licensed school of cosmetology to earn

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hours and MPAs. There are no provisions in place as exceptions to the rule at this time. Cosmetology students who attend a school of cosmetology, either on a secondary campus or at a contracted school of cosmetology through a secondary CTE program, may not attend or earn clock hours while their local district is closed.

3. Can students work virtually or at home?

The State Board of Cosmetology laws and rules do not allow for students to earn cosmetology hours off-campus or outside a school of cosmetology. Students must be on location at the licensed school of cosmetology to earn hours and MPAs. There are no provisions in place as exceptions to the rule at this time. Cosmetology students who attend a school of cosmetology, either on a secondary campus or at a contracted school of cosmetology through a secondary CTE program, may not attend or earn clock hours while their local district is closed.

4. How do we address an overlap of students with the required 1:20 teacher to student ratio?

Each school of cosmetology will have to evaluate its situation to determine what solution best meets their needs. However, we suggest schools begin to consider some of the following options:

- Temporarily employ an additional licensed cosmetology instructor to allow for more students to earn hours at the same time.
- Stagger hours by offering additional sessions, allowing students to attend at different times. For example, if students typically earn hours from 10:00 am to 2:00 pm, you could offer one session from 8:00 am – 12:00 pm and another from 12:00 pm – 5:00 pm.
- Increase the number of hours offered in a day or week for the current group of students to achieve the required number of hours faster. **Note:** Students may not earn more than 7 hours per day and 40 hours per week.
- Adjust the start date and calendar for the incoming students. This might require cosmetology programs to adjust hours for the incoming group of students for an entire year or for the entire length of the program, depending upon the amount of time affected by the overlap and number of hours left in the program.

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5. How can students achieve their lost hours once we are open again?

Each school of cosmetology will have to evaluate its situation to determine what solution best meets their needs; however, we suggest schools begin to consider some of the following options:

- Increase the number of hours offered in a day or week. This may mean increasing the number of hours offered each day and/or may include offering hours on a Saturday. **Note:** Students may not earn more than 7 hours per day and 40 hours per week.
- Lengthen the number of weeks of the program.
- Offer additional time outside of the typical school year (if a summer program is not already in place).

6. If school is permitted to resume, may we offer hours in the summer?

Schools of cosmetology may offer hours in the summer in accordance with state and district policy. Students may not clock more than 7 hours per day and not more than 40 hours each week.

7. Can we open the salon to cosmetology students and staff only, with no public hours?

Because school buildings (per [EO 2020-11](#)) and salons (per [EO 2020-20](#)) are closed to personnel, students and the public to prevent the spread of COVID-19, districts will not be able to open the salon to students and staff until the restrictions for both schools and salons have lifted and students are allowed to be back in session. When schools and salons are able to reopen, the school of cosmetology may still wish to keep the school salon closed to the public for a period of time. This will not affect student hours, as long as they are still completing the required hours and MPAs.

However, please note that the salon setting is an important component of the cosmetology curriculum and meeting all learning objectives may require students to spend time in the school salon to be prepared to earn a license. For example, students learn aspects of salon business and client consultation by helping run the school cosmetology salon. Students are also exposed to various types and textures of hair by working with members of the public.

CTE Programs CIP Specific: Health Science

1. Has there been discussion regarding Certified Nurse Assistant (CNA) clinical hours and how those might be met?

Because school buildings are closed to personnel and students to prevent the spread of COVID-19, district staff will not be able to perform the required

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monitoring aspects of work-based learning, and students will not be able to complete clinical hours until the restrictions have been lifted and schools are back in session.

Please refer to the [guidance issued by LARA](#) for more information about alternative options to finish clinical hours when schools are back in session.

2. What if my students are very close to finishing the CNA program, but can't complete the program requirements due to the closure? Are there any options to help them finish so they can get to work in hospitals who need them right now?

Students cannot perform patient work in long-term care, nursing facilities, or hospitals outside of the CNA, as they must be a student learner in an approved CNA program under the direct supervision of a certified instructor, or certified themselves to perform those jobs. Youth Employment work permits do not apply in this situation, due to state regulations.

Work-based Learning and Youth Employment

1. Are students permitted to participate in work-based learning?

No.

Section 5-P of The Michigan Department of Education Pupil Accounting Manual states that work-based learning experiences, apprenticeships, and internships must occur during scheduled classroom time. These training placements includes capstone, unpaid, in-district, classroom labs/clinicals, and less-than-class-size. Because school buildings will be closed to personnel and students to prevent the spread of COVID-19, districts will not be able to perform the required monitoring aspects of work-based learning.

Furthermore, it is recommended that WBL Coordinators keep details regarding the excused absences on the student's training and pupil accounting records. For additional questions pertaining to work-based learning, contact **Dana Hughes, Work Based Learning Coordinator, Office of Career and Technical Education, at 517-335-0359; or via email at hughesd9@michigan.gov**. Pupil Accounting questions can be forwarded to **Brian Ciloski, Specialist, State Aid and School Finance, Office of Financial Management at CiloskiB@michigan.gov**.

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Students who wish to work during the school closure, MUST have an approved Youth Employment Permit in place prior to start of employment. The State of Michigan Department of Labor and Economic Opportunity, Wage and Hour Division enforces the Youth Employment Standards Act 90 of 1978. Act 90 regulates the employment of minors under 18. Please visit their website at: https://www.michigan.gov/leo/0,5863,7-336-78421_94422-510667-,00.html for more information, including work permits and posters about workplace safety.

Questions related to Youth Employment Permits may be directed to Division Manager, Jennifer Fields, at 517-284-7800; or via email at fieldsj@michigan.gov.

2. Can a student obtain a youth employment work permit from the issuing officer to work on his/her own time (instead of WBL) during the shutdown period?

Yes.

Questions related to Youth Employment Permits may be directed to Division Manager, Jennifer Fields, at 517-284-7800; or via email at fieldsj@michigan.gov.