



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

GRETCHEN WHITMER  
GOVERNOR

MICHAEL F. RICE, Ph.D.  
STATE SUPERINTENDENT

**MEMORANDUM**

**DATE:** April 16, 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 *SK*

**SUBJECT:** **UPDATED** Career and Technical Education Requirements FAQ During COVID-19 Closure

Due to the COVID-19 pandemic, the governor ordered the closure of all schools for the remainder of the 2019-2020 school year. This includes all State Approved career and technical education (CTE) programs directly run by intermediate school districts (ISDs) and local education agencies. The is an update to [MDE MEMO #COVID-19-022 Career and Technical Education Requirements During COVID-19 Closure](#).

This Frequently Asked Questions (FAQ) will be posted to the [OCTE website](#) under COVID-19 FAQs-CTE and EMCs in addition to the [MDE website](#) (Guidance Memos) to clarify CTE requirements during this unprecedented situation. This FAQ will continue to be updated as necessary. The following questions have been updated:

Section	Question(s)
Federal Perkins	12, 12a & 15
61.a1 and 61b State School Aid	3
Reporting Requirements	1 & 2
CTE Programs	2 & 3
Special Education / IEP / Section 504 Plan	1
CTE Programs	2, 3, 5, 6 & 7
CTE Programs CIP Specific: Agriculture, Food and Natural Resources Education	1, 2 & 3
CTE Programs CIP Specific: Cosmetology	7
CTE Programs CIP Specific: Health Science	2
Work Based Learning (WBL) and Youth Employment	3, 4, 5, 6 & 7

For questions regarding this memo, please contact either Dr. Jill Kroll, OCTE Supervisor at [krollj1@michigan.gov](mailto:krollj1@michigan.gov) or Dr. Joanne Mahony, OCTE Supervisor at [mahonyj@michigan.gov](mailto:mahonyj@michigan.gov).

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## **Federal Perkins**

1. Is it permissible to continue paying Perkins-funded staff members during the shutdown 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 shutdown 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 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.

Michigan Department of Education  
Office of Career and Technical Education  
Frequently Asked Questions (FAQ)  
COVID – 19  
Thursday, April 16, 2020

---

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 have met the April 1 due date, please do so. If you were 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 our state and national leaders, 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?

MDE requested a waiver regarding reporting the 5S1 Recognized Postsecondary Credential for 2020–2021. USED replied, "Perkins V does not provide general waiver authority for the Secretary of Education. That said, we fully understand the difficulty that many states and local recipients will have in reporting data on all of their core indicators for the FY 2020-21 reporting year. We will be addressing this issue in the coming weeks in a way that makes sure that no state or local recipient faces consequences for data it is not able to submit due to the novel coronavirus (COVID-19) pandemic." Based on information from USED, regions are still required to report and administer credential assessments.

- 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.

Michigan Department of Education  
Office of Career and Technical Education  
Frequently Asked Questions (FAQ)  
COVID – 19  
Thursday, April 16, 2020

---

- Districts may report industry credentials for students until August 31; therefore, students who take credentialing exams in the summer will be counted. As a reminder, any credential expenditures after June 30, 2020 must be in the 2020–2021 Perkins grant.
- Districts may report credential data until August 31 in the year in which the student graduates.
- 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.

12.a. In consideration of allowing students to take state-defined Perkins V credential assessments through August 31, may regions hold student credential preparation workshops and pay summer teacher stipends outside of the teacher's contract?

Yes. This must be an approved activity in the region's 2020–2021 grant.

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 shutdown, 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 August 31 in the year in which the student graduates.

15. Will the region rank higher on the risk analysis if the region does not expend 100% of the grant award?

Regions will not be penalized for an inability to expend funds due to the COVID-19 school closure.

### **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, but districts may expend 2019–2020 Added Cost Section 61.a1 funds through August 31, 2020.

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

Yes.

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?

Reporting timelines have not been changed.

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?

State School Aid Section 61.a1 Added Cost and Perkins Core Performance Indicator (CPI) reporting has not changed.

## **Special Education / IEP / Section 504 plan**

1. Are districts required to provide equal access to alternative modes of instruction for student with disabilities in career and technical education programs?

Review and comply with the governor's Executive Order 2020-35 Section VI in determining equal access to alternative modes of instruction for student with disabilities. Please direct clarifying and additional questions to Rebecca McIntyre in the Michigan Department of Education, Office of Special Education at [mcintyre1@michigan.gov](mailto:mcintyre1@michigan.gov).

## **CTE Programs**

1. Is the Career Education Planned District (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 in Navigator?

Yes. Work-based learning is a required component of a State Approved CTE program. While in this state of emergency school closure, MDE realizes that many of these planned activities may not have taken place. Teachers should still document the completed work-based learning experiences in which students participated during the time school was in session and note any planned experiences that were impacted by closure. A narrative description of the activities that took place, with estimated student numbers is acceptable.

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. While in this state of emergency school closure, MDE realizes that many of these planned activities may not have taken place. Teachers should still document the completed student leadership experiences in which students

Michigan Department of Education  
Office of Career and Technical Education  
Frequently Asked Questions (FAQ)  
COVID – 19  
Thursday, April 16, 2020

---

participated during the time school was in session and note any planned experiences that were impacted by closure. A narrative description of the activities that took place, with estimated student numbers is acceptable.

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.

5. Will the CIP self-review submission timeline be extended?

No. In consideration of the transition from Navigator to GEMS, an extension is not feasible.

6. Are CTE programs required to continue to provide leadership opportunities for students?

Yes, leadership is a required component of a State Approved CTE program, these leadership growth opportunities should continue to be available to support students. Unfortunately, these activities cannot be done in person, at this time. Teachers are encouraged to facilitate remote learning experiences that will allow opportunities for all students to participate. Consider alternative methods to carry out leadership training and leadership activities such as: virtual year end student recognition programs, meetings, election of officers for next year, online professional development, and other student-led activities that will help students strengthen their leadership skills.

7. Are CTSO and leadership activities considered an extracurricular activity?

No. CTE leadership training, most often implemented through a Career and Technical Student Organization (CTSO), is a required co-curricular component of a High-Quality Program of Study for State Approved CTE programs.

## **CTE Programs CIP Specific: Agriculture, Food and Natural Resources Education**

Care for live animals and plants is a very important and essential task. Please refer to the Michigan Department of Agriculture and Rural Development (MDARD) memo titled "[Critical Infrastructure Guidance for Food and Agriculture Businesses](#)".

1. Who should care for live plants and animals at school-based laboratory AFNRE programs?

During the school closure, students are not permitted to participate in the care of live animals and plants at the school location. District leadership is responsible for deciding who will be responsible for the care of live plants and animals.

Continue to follow biosecurity practices that are taught in AFNRE programs and throughout the agricultural industry. [Biosecurity As Easy as 1, 2, 3!](#) which was released by Michigan State University in 2018 is a very appropriate guide for care of live animals and is now also important for the care of live plants.

2. How often should a district provide care for live plants and animals?

Often, care for live plants and animals is a seven-day-a-week obligation. Some tasks must be performed each day and may be attended to by individual(s) designated by the district. The individuals qualified to care for live plants and animals is addressed in documentation in the [Fair Labor Practices Act in Agriculture](#).

- a. The school district should determine who should care for live plants and animals. This should be limited to individuals who have the skills to complete the needed care on a typical day. In the event of a non-typical situation, expert assistance may be needed and that will be determined by the district.
  - b. Individuals who care for animals and plants should abide by the Michigan Department of Agriculture and Rural Development (MDARD) memo titled "[Critical Infrastructure Guidance for Food and Agriculture Businesses](#)".
3. Additional resources about Agriculture can be found at: [www.michigan.gov/mdard](http://www.michigan.gov/mdard).



### **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 Coronavirus 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 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 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 clock hours while their local district is closed.

3. 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 their 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.

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

Each school of cosmetology will have to evaluate their 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).

5. 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.

6. 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, for the prevention 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 to run the school cosmetology salon. Students are also exposed to various types and textures of hair by working with members of the public.

7. Can a State Approved CTE cosmetology student complete his or her training through distance education to qualify and satisfy the requirements for high school graduation and earn hours toward their cosmetology license?

The ability to grant hours or Minimal Practical Applications (MPAs) is outside the authority of Michigan Department of Education (MDE) – Office of Career and Technical Education (OCTE). The department has no authority to issue a waiver from cosmetology educational or curricular requirements in statute and rule.

MDE recommends State Approved cosmetology programs participate, to the extent practicable, in the creation and delivery of supplemental learning opportunities. Instructors should differentiate for students the fulfillment of expectations for high school credit and the fulfillment of expectations for cosmetology hours and MPAs awarded, as these may differ. Students may be expected to complete work to earn high school credit, even if that work may not count toward hours/MPAs submitted to the State Board of Cosmetology and the Michigan Department of Licensing and Regulatory Affairs (LARA).

As LARA and the Bureau of Professional Licensing requires the submission of hour reports by the 10<sup>th</sup> of every month, OCTE recommends that cosmetology programs submit the March monthly report with only the hours earned while on campus or in approved district instruction.

MDE recommends that CTE State Approved cosmetology programs maintain two sets records documenting the hours for March and the months ahead. Programs should maintain one set documenting hours and MPAs earned during in-person instruction, and a second set documenting hours and MPAs earned through virtual instruction. The second set of records may prove to be useful in the event the hours submitted may be allowed pending future guidance from the State Board of Cosmetology. Should this guidance occur, MDE recommends CTE State Approved cosmetology programs develop policies and protocols for verifying hours and MPAs during COVID-19 closure.

### **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 for the prevention of COVID-19, district staff will not be able to perform the required 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?

Secondary school 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.

The Governor's executive order only waived testing to get a temporary registration, not training. Under federal and state law, an individual must complete a State Approved training program. If school has not completed the clinical hour training for students prior to the closure, students cannot complete a State Approved training program and the temporary registration is not available.

Please refer to the LARA web pages regarding CNA training for updates:

[Department of Licensing and Regulatory Affairs \(LARA\) – Nurse Aid Registry](#)

[Department of Licensing and Regulatory Affairs \(LARA\) – Nurse Aid Training Program](#)

## **Work Based Learning (WBL) and Youth Employment**

1. Are students permitted to participate in WBL during the school closure?

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, for the prevention 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](mailto: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](mailto:CiloskiB@michigan.gov)**.

Students who wish to work during the shutdown, 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](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](mailto:fieldsj@michigan.gov).

Michigan Department of Education  
Office of Career and Technical Education  
Frequently Asked Questions (FAQ)  
COVID – 19  
Thursday, April 16, 2020

---

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](mailto:fieldsj@michigan.gov).

3. When referring to "youth employment work permit," does that mean a "training agreement" that covers after school and weekend hours?
- The Youth Employment Work Permit is not utilized for work-based learning experiences.
  - WBL training agreements with extended hours and days are still prohibited while schools are in a shutdown status.

4. If a student is 18 and older, can he/she be employed during the school closures?

Yes. Students who are 18 years of age and older are not governed by the Youth Employment Standards Act.

5. Specific to WBL students who are not allowed to work; we have employers who are willing to have students telecommute. Is this allowable?

No. Because school buildings will be closed to personnel and students, for the prevention of COVID-19, districts will not be able to perform the required monitoring aspects of Work Based Learning. See Work Based Learning and Youth Employment Question 1 for details.

6. Who is responsible for issuing the Youth Employment Work Permit?

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

Michigan Department of Education  
Office of Career and Technical Education  
Frequently Asked Questions (FAQ)  
COVID – 19  
Thursday, April 16, 2020

---

7. Can a student in a paid work-based learning experience collect unemployment?

Unemployment inquiries are not handled through the Office of Career and Technical Education. Individual questions can be forwarded to the Michigan Department of Labor and Economic Opportunity Unemployment Insurance Agency at [Michigan.gov/UIA](https://www.michigan.gov/UIA).