



COVID-19 Guidelines

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Board Policy Reference:	Board Policy 7010 – Purchases; Bids, Public Lettings Board Policy 7015 – Contracts; Limitations, Exemptions
Statutory, Accreditation, and Federal Reference:	<p>Higher Learning Commission Notification Procedures for Changes to Educational Offerings</p> <p>U.S. Department of Education 34 CFR § 668.3 – Academic Year Coronavirus Aid, Relief, and Economic Security Act CARES Act: Higher Education Emergency Relief Fund</p> <p>Centers for Disease Control and Prevention Mitigation Strategies for Communities with Local COVID-19 Transmission</p>
Related Form(s):	

National and International events associated with COVID-19 (Coronavirus) have required the Nebraska State College System to adopt alternative options to facilitate the successful completion of the 2020-2021 academic year for students at Chadron, Peru and Wayne State Colleges. This is an evolving situation and System and College officials continue monitoring via regular updates and guidance from the US Centers for Disease Control and Prevention, the Nebraska Department of Health, and local health professionals. New and revised guidance will be added to this document as additional information becomes available.

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1. Continuity of Academic Activities

1.1. Summer 2020 Course Delivery

All courses scheduled for delivery during the 2020 Summer term will be delivered remotely in compliance with HLC requirements. All courses listed in the College's summer catalog as face-to-face will be moved to remote delivery, and students will be assessed the established tuition and fee rates for the course modality designated on the date course registrations opened. Summer courses originally designated as online when the registration window opened will be assessed the online course rate as established by the Board of Trustees.

1.2. Fall 2020 Schedule and Course Delivery

For the formal FALL 2020 term established within PeopleSoft, the Nebraska State Colleges have officially modified the Fall 2020 "Regular Academic Session" to run from Monday, August 17, 2020, through Wednesday, November 25, 2020, and have added a new three-week "D-Session" option for the Fall 2020 Term. Colleges shall work with Faculty and Staff to prepare all undergraduate and graduate courses to be offered within this compressed calendar. As a result of these academic session changes, the following guidelines will be established:

- 1.2.1. All undergraduate and graduate courses that were initially scheduled within the dates of the Regular Academic Session for the Fall 2020 semester must be delivered within the dates of August 17, 2020, to November 25, 2020. This includes all shorter online sessions. Regular Academic Session courses that are on campus (face-to-face) shall have their final class meetings scheduled on or before November 20th, with final examinations scheduled for November 23-25, 2020.
- 1.2.2. All on-campus (face-to-face) courses offered during the Fall 2020 semester shall have a Learning Management System (LMS) shell developed that provides flexibility for students whose attendance may be temporarily impacted by COVID-19, and/or for a full transition of delivery to remote instruction, should the need arise prior to the end of the fall semester.
- 1.2.3. All NSCS full-time faculty will be on contract beginning Friday, August 14, 2020, and have their Fall 2020 teaching assignments fully loaded with coursework offered during the Regular Academic Session dates. No D-Term course assignments shall be part of their fall teaching load.
- 1.2.4. Final grades for all Fall 2020 Regular Academic Session should be completed and posted in PeopleSoft no later than the end of the day on Wednesday, December 2, 2020.
- 1.2.5. Financial Aid Offices may either (a) keep the established payment and disbursements dates that were established in accordance with the Student Account Guidelines if those dates have been advertised and communicated to students for the Fall 2020 Term, even though the start date of the term has been changed; or (b) move the established payment, and disbursement dates one week earlier to coincide with the normal semester timeline as provided in the Student Accounts Guidelines.

- 1.2.6. Drop/Add and No Show policies should reflect the change of any start dates for Fall 2020 Term sessions.

1.3. Face-to-Face Courses

On campus courses should be designed to comply with the social distancing expectations outlined in Section 3 of these guidelines. Colleges may employ different modality options (i.e., hybrid, hi-flex, etc.) that allow for greater flexibility in meeting social distancing requirements and responding to any necessary delivery modifications as the semester continues. Faculty assigned to teach face-to-face courses should work toward designing their courses to transition seamlessly to remote delivery during any point in the academic term. All courses shall have a course shell using the College's (LMS) at the start of the semester to facilitate the timely transition consistent with new federal or state restrictions resulting from COVID-19. Should changes in delivery format occur that extend beyond each College's current HLC authorizations for educational offerings, notification should be made to HLC as soon as possible.¹

1.4. Compressed Academic Calendar

In the event of a need to compress the Fall 2020 Academic Calendar for remote course delivery, Colleges will follow the guidance outlined in section C of 34 CFR § 668.3² to make that determination following approval from the Chancellor.

1.5. D-Term Session

A new December (D-Term) Session shall be created as a new academic session within the Fall 2020 Term in People Soft and run from November 30, 2020 to December 18, 2020. Courses offering during this session can be delivered via face-to-face, hybrid/flex, or online.

- 1.5.1. Colleges are encouraged to offer courses during the D-Term that are not regularly offered or available to students, and that provide students with an opportunity to

¹ "If an institution needs to adjust its business operations in substantial ways, (for example, reducing or suspending face-to-face class sessions), an institution should notify HLC of the adjustment, including the steps it takes to ensure quality and continuity in its instructional activity." (<https://www.hlcommission.org/General/coronavirus-updates.html>)

² (c) Reduction in the length of an academic year. (1) Upon the written request of an institution, the Secretary may approve, for good cause, an academic year of 26 through 29 weeks of instructional time for educational programs offered by the institution if the institution offers a two-year program leading to an associate degree or a four-year program leading to a baccalaureate degree.

(2) An institution's written request must -

- (i) Identify each educational program for which the institution requests a reduction, and the requested number of weeks of instructional time for that program;
- (ii) Demonstrate good cause for the requested reductions; and
- (iii) Include any other information that the Secretary may require to determine whether to grant the request.

(3)(i) The Secretary approves the request of an eligible institution for a reduction in the length of its academic year if the institution has demonstrated good cause for granting the request and the institution's accrediting agency and State licensing agency have approved the request.

- (ii) If the Secretary approves the request, the approval terminates when the institution's program participation agreement expires. The institution may request an extension of that approval as part of the recertification process.

immerse themselves in a specific topic and/or experience, based on faculty interest and expertise. If on campus (face-to-face) courses are developed for D-Term, instructional flexibility should also be planned to allow for remote instruction if needed.

- 1.5.2.** Students will be eligible to enroll in up to three credit hours during this mini-session, based on SAP as determined for all Fall 2020 Term session offerings.
- 1.5.3.** Final grades for the D-Term should be completed and posted in PeopleSoft by no later than the end of day on Tuesday, December 22, 2020.
- 1.5.4.** The compensation for instruction for D-Term courses will be \$850 per credit hour for adjunct faculty and two and one-half percent (2.5%) of the faculty member's academic year salary per credit hour³ for full-time faculty. Courses offered during this session shall be revenue-neutral for the Colleges. To meet this expectation, Colleges may negotiate a lower rate based on the level of enrollment for various sections. Instructors may only be approved to teach up to three credit hours during this mini-session.
- 1.5.5.** Students will be able to use 2020-2021 financial aid awards toward costs associated with the non-standard D-Term and any associated room and board charges if remaining on campus, as the session can be packaged within the 2020-2021 financial aid awarding period. The Colleges' Financial Aid Offices will be able to counsel and advise students who are interested in enrolling in a D-Term course and can work with students who wish to authorize the College to withhold funds for use toward D-Term costs. No additional funds will be available specific to the D-Term.

1.6. Study Abroad Programs

All Study Abroad programs scheduled for the Fall 2020 and Spring 2021 academic terms shall be canceled. Colleges shall be allowed to postpone in those instances where vendor contracts can be re-negotiated.

2. Academic Policies, Procedures & Accommodations

2.1. Attendance

Colleges shall develop attendance policies for all students, which include monitoring student attendance at face-to-face courses. Policies at the course level shall be flexible enough to ensure that students adversely impacted by COVID-19 (i.e., experiencing symptoms, assist with family members, etc.) are not penalized by their inability to attend class.

2.2. Course Delivery and Scheduling Options

- 2.2.1.** Before or after the semester starts, subject to normal drop/add/transfer deadlines, a student can request schedule or course changes if the student has general concerns

³ Section 10.13 of the [SCEA Agreement](#) outlines requirements for D-Term Compensation Pay which establishes "Compensation for the three-week December Term (D-Term) for faculty shall be paid at the rate of two and one half percent (2.5%) of the faculty member's academic year salary per credit hour."

about attending classes in person and/or a specific concern regarding face-covering requirements in classrooms. These requests should be addressed similarly to a student who is unable to attend classes during any specific academic term but wishes to continue their education remotely.

- 2.2.2.** Before the semester starts the College can decide to offer any course in a blended format per SCEA Agreement Section 5.4.1.⁴
- 2.2.3.** Before or after the semester starts, the President has the ability to change the format for an individual course from face to face instruction to online/remote instruction temporarily or for the remainder of the semester. This option could be necessitated by a faculty *emergency* (sick or COVID quarantine) or by *mass* student absences due to sick or COVID quarantine emergencies. Only the Chancellor has the ability to make the comprehensive decision to move all College courses to online/remote instruction.
- 2.2.4.** Before or after the semester starts, the College can require faculty to provide “simultaneous remote instruction” using one or more collaboration tools to provide remote access to instruction for individual students enrolled in a face to face course who are unable to attend one or more class meetings due to COVID-19 and have had their request for remote instruction formally approved by the Academic Vice President. “Simultaneous remote instruction” is a situation where the faculty member is on campus, the majority of enrolled students are on campus attending in-class instruction (in one or more rooms), and remote instruction is being provided to one or more students who have received approval to access their instruction remotely. This will entail additional compensation of \$250 for the faculty member per the SCEA Agreement Section 5.4⁵
- 2.2.5.** At any time before or during the semester, individual student requests will be treated as follows:
- ADA accommodation requests (which may or may not be COVID related) must be addressed by the College’s ADA Coordinator.

⁴ Section 5.4.1 of the [SCEA Agreement](#) outlines requirements for Blended Courses which establishes: “A blended course is a course which has two groups of students enrolled in the course- online students and students who will receive instruction face to face in the regular classroom. The course has a single syllabus, a common set of assignments, a common schedule and curriculum. Faculty teaching a blended course shall receive incentive pay at a rate of \$250. Blended course enrollments will be capped at thirty (30) students per blended course counting the total of face to face and online students. If the total course enrollment exceeds thirty (30) students, the faculty member will receive the equivalent of two-thirds (2/3) in-state tuition per student above the enrollment cap.”

⁵ Section 5.4 of the SCEA Agreement outlines requirements for Online and Interactive Distance Learning Courses which establishes: “.....Faculty teaching via interactive distance learning will receive incentive pay for a three (3) credit hour course at the rate of \$250 per remote site. The number of remote sites shall be limited to no more than three per course. Any exception to this limit must be approved by the appropriate Dean in consultation with the faculty member. Incentive pay for interactive distance learning courses which are either less than or more than three (3) credit hours will be in proportion to this rate.”

- COVID concerns not rising to the level of a disability will be treated on a case by case basis via faculty and College administrators, similar to how current temporary situations are handled when a student becomes ill or cannot physically attend class.
- Face mask objections or fear issues will not be treated as an ADA accommodation request.
- Requests for waivers of the on-campus residency requirements or to be released from housing contracts should be handled in the same manner as set forth in each College's housing rules, regulations, and contracts. A request for a waiver for COVID related reasons should be addressed as any other ADA accommodation request.

2.3. Credit/No Credit Course Grade Options

Certain students may benefit from the opportunity to convert a course letter grade of A-F to a Credit/No Credit (Pass/Fail) grade option, and each College may evaluate its internal policies related to these non-letter grade options for students. Colleges shall comply with the Board of Trustees [Policy 4300 Transfer of Credits & Degrees](#) when accepting credit from students during terms affected by COVID-19.

2.4. In Progress Grades

Students adversely impacted by COVID-19 activities should be afforded opportunities to receive an in progress grade for a course by working directly with faculty to outline a course of action for completing course assignments. In progress grade policies at each College should be used to guide the use of this grading option for students.

2.5. Student Teaching

The Nebraska Department of Education has stipulated that "As long as your students have been enrolled in, and engaged in, a student teaching experience, and have/can demonstrate competency in the student teaching experience, as defined/described by your institutions, you may sign off on the institutional verification form that your students meet the requirements for student teaching."⁶ Colleges have been asked to make every effort to provide affected students with experiences that would allow them to demonstrate said competency.

2.6. Internships

Similar to the accommodations provided by NDE for student teaching, the Colleges should extend the same consideration for any internships in which students are enrolled during academic terms impacted by COVID-19, as they may experience similar situations that will impact their ability to fully complete their placement hours. Instructors and supervisors should be flexible and consider whether students have met the intended outcomes established for each internship, rather than being concerned about a specific minimum number of placement hours to complete the experience. If a student is unable to complete a required internship as a result of COVID-19, Colleges shall provide appropriate course substitutes to ensure on-time graduation.

⁶ Nebraska Department of Education correspondence from Kelly Heineke dated Monday March 16. Recommendation from the NDE for the remainder of the 2019-2020 school year only.

3. Social Distancing, Personal Protective Equipment, and Screening

3.1. Social Distancing

Colleges will draw upon the Social Distancing requirements determined by the Department of Health and Human Services, which are outlined in any current Direct Health Measure for the State of Nebraska. The current DHMs establish the following restrictions under the time periods specified:

- Phase II⁷ - Beginning on June 1, 2020 gatherings on campus will be limited to the greater of 25 persons (excluding staff) or 25% of rated occupancy (not to exceed 3,000). Classroom limits set at no more than twenty (20) students per room/space or 25% of capacity, whichever is greater.
- Phase III⁸ – Beginning on June 22, 2020 indoor gatherings will be limited to 50% of rated occupancy (not to exceed 10,000), and outdoor gatherings will be limited to 75% of rated occupancy (not to exceed 10,000). Groups shall not be larger than eight (8) individuals with guidance that six (6) feet separation be encouraged where possible. Fitness centers shall be limited to 75% rated occupancy. Classroom limits set at no more than thirty (30) students per room/space or 50% of capacity, whichever is greater.
- Phase IV⁹ – Indoor gatherings will be limited to 75% of rated occupancy (not to exceed 10,000), and outdoor gatherings and fitness centers will have no occupancy limits. Colleges must submit reopening and expanding access plans to the local health departments for indoor and outdoor locations/venues on campus that hold 500 or more individuals. No limits for number of students per classroom.

3.2. Personal Protective Equipment (PPE)

The Center for Disease Control (CDC) guidance encourages the wearing of face-covering in public settings where other social distancing measures are challenging to maintain as it has been shown to help slow the spread (especially for individuals who are asymptomatic). Colleges may provide on-campus students, faculty, and staff with up to two face-coverings. Any PPE designated as necessary for staff to complete their work in high-risk areas (i.e., cleaning high use areas, isolation/quarantine facilities, etc.) shall be provided by the Colleges. The College should provide appropriate donning and doffing instructions to faculty, students, and staff, and the following guidelines shall be followed:

3.2.1. Campus Facilities and Open Spaces

All students, faculty, and staff are encouraged to wear a protective face covering while on campus, even when appropriate social distancing can be enforced. Face covering

⁷ Phase II [Directed Health Measure](#) from the Department of Health and Human Services extended the 10 person limit to 25 or 25% occupancy.

⁸ Phase III [Directed Health Measure](#) from the Department of Health and Human Services extended the 25 person limit to 50% (indoor) and 75% (outdoor) occupancy for locations on campus.

⁹ Phase IV [Directed Health Measure](#) from the Department of Health and Humans Services extended the indoor (75%) and outdoor (100%) occupancy limits for locations on campus.

may be required when social distancing is not possible.

3.2.2. Courses Requiring Face Covering

Face covering shall be required for all courses, unless faculty opt-out of this requirement and facilities can accommodate the social gathering limits determined by the DHHS for Nebraska DHM's. When facilities do not accommodate capacity and/or social distancing guidelines as indicated by DHMs, face-covering shall be required for all students and faculty. This shall also include requiring face-coverings for all students and faculty while transitioning through hallways of academic buildings. Colleges shall notify students of campus face-covering requirements prior to August 17, 2020.

3.3. Screening Protocols

The Nebraska State College System, in consultation with the State of Nebraska, shall develop protocols to implement routine COVID-19 related screening questions for all students, faculty, and staff. Web-based or mobile screening applications may be used to encourage individuals to self-direct themselves to the appropriate health care personnel. The Nebraska Department of Health and Human Services or Regional Health District will assist with prescreening of students prior to their arrival on campus and additional testing that may be necessary. Students, faculty, and staff are encouraged to conduct a self-assessment of COVID-19 related symptoms that may include daily temperature checks prior to entering the campus and/or facilities. Each college shall also designate a method for students, faculty, and staff to report when they become symptomatic.

3.4. Facility Entry Points & Uni-Directional Flow

Facilities shall be marked with designated entry and exit points (when possible) to limit student, faculty, and staff contact, and implement (where possible) non-touch controls for door handles, faucets, and elevators. Directional signage shall also be used to limit crossover among students, faculty, and staff during high traffic times on campus.

3.5. Residence Halls

Multiple students may be assigned to a room in the residence halls, assuming that guidance is developed and followed for ensuring social distancing in the facilities. No groups larger than eight (8) shall gather in a single room or area if space does not allow for six (6)-feet of social distancing. Students may be provided options for a single room if they feel the need to be accommodated due to pre-existing conditions or safety concerns. When residence hall space exists, students may be assessed a discounted single room rate below that approved by the Board of Trustees. To accommodate required isolation and/or quarantine for a COVID-19 medical reason, Colleges should either designate one (1) residence hall or limited access wing or enter into a contract with a local hotel(s) to support students who have tested positive or are experiencing symptoms.

3.6. Extracurricular Activities & Student Organizations

Extracurricular activities shall be allowed under the established social distancing requirements outlined in the DHM. Colleges should provide guidance and signage to inform students about the space limitations that exist for various facilities and rooms to ensure that appropriate distancing occurs.

3.7. Athletics

Each College shall follow the rules and guidelines developed by its respective conference or association and state/local DHM's and Guidance for determining when athletic competition will proceed. Athletic Directors shall work with their coaches and staff to develop practice sessions that will allow for appropriate social distancing to include:

- Frequent assessment of symptoms for athletes involved in sports that have increased physical contact;
- Adequate cleaning protocols for equipment and facilities to ensure the safety of athletes and coaches;
- Coordinated practice schedules that allow for appropriate cleaning between sessions;
- Development of protocols for athlete engagement with training staff and coaches when physical contact may be required; and
- Athletic Departments will be responsible for submitting plans for reopening or expanding to new capacity limits to the local health departments for approval for all indoor and outdoor locations/venues that hold 500 or more individuals (this includes athletic competitions and sports camps).

3.8. Dining and Food Service

Campus dining facilities shall provide "grab and go" options in order to reduce the need for students to congregate in dining halls for meals. Where possible, additional physical barriers should be installed to limit contact between dining facility staff and patrons. Dine-in options shall be allowed if the Colleges comply with the DHHS "Restaurant In-Room Dining Reopening Guidelines." Beginning on June 22, 2020¹⁰ dine-in service can serve patrons at 100% occupancy rating for the facility and must:

- Maintain a minimum of six (6) feet of separation for each dining party table;
- Ensure a maximum of eight (8) individuals to each dining party table (groups larger than eight will need to split into multiple tables); and
- Eliminate self-serve buffets and salad bars, with dining facility staff serving food directly to students;

In addition to the requirements found in the DHM as outlined above, dining facilities and related staff are asked to adhere to the [Guidelines](#)¹¹ developed by the Division of Public Health and the Nebraska Restaurant Association.

3.9. Summer Camps

¹⁰ Phase III [Directed Health Measure](#) from the Department of Health and Human Services extended the occupancy level from 25% to 100% beginning on June 22, 2020.

¹¹ The Division of Public Health and the Nebraska Restaurant Association has developed a set of [guidelines](#) for: 1) Managing employee health; 2) Personal hygiene for employees; 3) Managing operations in foodservice establishments; and 4) Managing food pick-up and delivery that should be followed at each College.

Colleges may provide academic and athletic summer camp opportunities to students and shall comply with the Nebraska Department of Education Guidelines¹² established for keeping students and staff healthy and safe.

3.10. Office Space

When possible, staff and faculty office space shall be organized with the placement of desks and furniture to accommodate six-foot space. Where possible, Colleges shall place physical barriers (e.g., plexiglass) between individuals who have frequent contact with students or other campus personnel.

4. Administrative Campus Controls, Policy, and Procedures

4.1. College Health Advisory Committee

Each College shall form a Health Advisory Committee to include campus and faculty leadership in critical areas, including instruction, student services, event planning, public safety, and health care. The Committee should be convened frequently to respond to ongoing challenges and opportunities surfacing from the pandemic. Select members of the College Health Advisory Committee shall also serve on the System COVID-19 Leadership team to assist in refining guidelines and sharing of resources across the System.

4.2. Public Health Resources

Common public health resources shall be provided in a timely manner to students, faculty, and staff. These include resources related to the pandemic spread and recovery, access to counseling services and key public health resources, and detailed actions that will be taken in the event that College personnel become symptomatic and/or test positive to COVID-19. A common communication strategy and educational resources shall be coordinated at the System level to assist with ongoing engagement with campus personnel to monitor symptoms, risk-minimizing behaviors, and any necessary training.

5. Access to Campus

5.1. Campus Remains Open

College campuses will be open, and students will have access to residence halls, dining facilities, libraries, computer labs, and the complete range of student and academic support services necessary to successfully provide in-person delivery for the 2020-2021 academic year. Colleges shall align social distancing expectations for formal and informal gatherings for students, as outlined in Section 3 of these guidelines.

5.2. Students Exposed to, Experiencing Symptoms, or Confirmed Cases of COVID-19

The Colleges shall work closely with their regional health departments for routine testing based upon campus and home symptoms surveillance. Tracing protocols shall also be developed with the regional health department for tracing and any necessary containment of students, faculty,

¹² Nebraska Department of Education's Launch Nebraska (Effective June 8, 2020) outlines the [Health Guidance for Summer](#) programming in the state of Nebraska. The Checklist outlined on page 2 of this document shall be used by the Colleges for managing summer camp that occur on campus.

and staff who may test positive for COVID-19. If a student living on campus begins experiencing COVID-19 symptoms, they should be isolated/quarantined. Pandemic Plans for each College should have procedures for when and how to isolate students in dedicated space in the residence halls or off-campus if the need to self-isolate arises due to possible exposure or if they become ill, as well as how to continue to provide food services to those students.

Colleges cannot provide individual information to the Department of Health and Human Services or the local health department regarding a sick student or employee.

5.3. Students Traveling out of State

Students should be strongly encouraged to restrict in- and out-of-state travel. Colleges will use the DHHS guidance for the types of out-of-state travel as outlined below:

- International Travel – All students returning from international travel should be tested or self-quarantined for 14 days following their return.
- Out-of-State Travel – Starting June 1, 2020 returning travelers from outside of Nebraska will no longer be required to self-quarantine for 14 days¹³ even if traveling through widespread transmission areas.
- Commuters – Students passing through a region with documented widespread transmission are not considered at-risk groups and will not be required to self-isolate.

5.4. Access to Individual Campus Facilities, Areas and Buildings

5.4.1. Buildings Requiring Essential Functions

Each College may close individual buildings or portions of buildings on campus that serve ongoing essential functions for students and staff.¹⁴ A closure would be done in order to limit unnecessary personal contact among employees and students beyond those necessary to perform the essential functions. If business functions continue in a limited capacity in an area on campus, notifications shall be posted for students and staff outlining steps for scheduling appointments or facilitating essential functions remotely. **5.4.2. Library Facilities and Services**

Colleges should implement strategies for social distancing and limiting gatherings to comply with current DHM requirements. Hours of operation may be adjusted at each College to align with student demand and the services provided.

5.4.3. External Personnel and Visitors

The College is responsible for communicating the social distancing and gathering requirements outlined in these guidelines to all external personnel and visitors to campus. Visitors, service providers, vendors, or contractors failing to comply with these guidelines will be restricted from campus.

6. Campus Events, Activities, and Travel

¹³ Governor Ricketts updated [Directed Health Measures](#) for June approved on May 21, 2020.

¹⁴ [Nebraska Emergency Management](#) guidance dated March 24, 2020 specified that Businesses and individuals do not need to be placed on an essential business or worker list with the State of Nebraska. Businesses have been asked to follow the rules limiting gatherings consistent with the State DHM orders.

6.1. Campus Events

Campus events including visitors may be scheduled at the College as long as the established social gathering limits determined by DHHS are upheld. When visitors are allowed on campus face covering should be recommended to ensure the safety of students, staff, and faculty.

6.2. Commencement Activities

Commencement Activities may be held in compliance with DHHS social distancing restrictions. All students unable to participate in a traditional graduation ceremony should be given opportunities to participate in future Commencement events on campus once social distancing limits allow.

6.3. College Related Travel

Non-essential College-related in-state and out-of-state travel should be canceled or postponed. Decisions regarding what travel pertains to required duties or curricular requirements shall be made by the appropriate president's staff level supervisor or academic dean when travel is necessary for:

- College staff to successfully complete his/her required duties and/or responsibilities for the College;
- College-sponsored athletic teams to compete in scheduled events as approved by the guidance from the Athletic Conference and Association;
- Established student organizations ([Policy 3300](#)) and extracurricular activities funded through student activity fees; or
- Established travel related to course/program requirements or academic and professional organizations ([Policy 4050](#)).

If travel arrangements have already been scheduled, employees should work with their respective travel offices to cancel those plans until the travel restriction is rescinded.

6.4. On-Campus Visits

Visits scheduled for campus shall comply with established social distancing requirements as outlined in Section 3 of these guidelines.

Job interviews may continue and be completed virtually if travel restrictions limit a candidate's opportunity for in-person engagement with the search committee. Offering alternatives to face-to-face interviews may be warranted in some cases, but not all. Alternatives offered to one candidate must be offered to all candidates for the same position.

7. Insurance Coverage

7.1. Business Interruption Coverage

The MHEC Master Property Program does include business interruption coverage, which is only triggered when the interruption is due to physical damage to property. In the event that coverage becomes available, each College should track any expenses/costs related to its COVID-19 response in the event that it is determined that coverage exists or if assistance is offered through FEMA/NEMA or another state or federal agency.

7.2. No Change in Notice Requirements

No action is necessary regarding potential COVID-19 claims until such time as a College receives notice of a specific incident that may give rise to a claim against the College, Board or Nebraska State College System (NSCS). United Educators (UE) expects to have advanced notification when written or verbal notice outlining the intent to hold NSCS accountable for a specific incident is received. UE also wants to be notified of incidents related or connected to what UE refers to as the "Nasty9" as outlined on the endorsement from the UE policy that the Colleges received earlier, which is consistent with current insurance claims reporting procedures.

8. Emergency Purchasing and Contract Procedures

8.1. Emergency Purchases

The emergency provisions in [Board Policy 7010 – Purchases; Bids, Public Lettings](#) grant authority for the Chancellor to approve contracts or make emergency purchases. Emergency purchases¹⁵ can be made through the suspension of bidding requirements for emergencies, as appropriate and with the Chancellor's approval. If a College is requesting to utilize this emergency declaration, the Vice President for Administration and Finance (VPAF) at each College shall send an email to Carolyn Murphy and Steve Hotovy in the System office requesting approval for the purchase and the waiver of normal procedures being requested.

8.2. Contract Requirements

The emergency provision in [Board Policy 7015 – Contracts; Limitations, Exemptions](#) provides an exemption from Board approval of "*any contract associated with an emergency approved by the Chancellor*". If a College is requesting to utilize this emergency declaration, the VPAF shall send an email to Carolyn Murphy and Steve Hotovy in the System office and request approval for the contract that would otherwise require board approval.

8.3. Purchase of Personal Items

Colleges are authorized to purchase and distribute hand sanitizer and face-coverings and should move forward with purchasing such items. Other Personal Protective Equipment (PPE) may be deemed necessary for specific units, and may also be purchased by the College to ensure the safety and security of students, faculty and staff. Other PPE for visitors and guests may also be purchased by the College if deemed necessary. Items purchased by students, faculty or staff for their personal use shall not be reimbursed by the College.

9. Human Resources

9.1. Absences

¹⁵ "Emergency shall mean any situation where it is necessary to enter into a contract to (a) avoid the loss of life, health, safety, or property, (b) respond to time limits established by an external authority, (c) ensure the continuation of an essential College service, function, utility, facility or computer/software system, or (d) avoid, correct or repair a situation outside the control of the Colleges including detrimental negligence or acts of an employee, natural or manmade disasters, and security or data compromise.

Proposed emergency purchases shall be documented by the College unit or department, and submitted to the Vice President for Administration and Finance, for approval by the Chancellor. The Chancellor may also approve the suspension of bidding requirements as appropriate for each emergency."

If employees are sick or under quarantine, they should not report for work.¹⁶ Employees should follow normal procedures for reporting an absence to their immediate supervisor and submitting leave via the Firefly/ESS system.

9.2. Leave and Accommodation Requests

All individual employee leave and/or accommodation requests should be managed through the Human Resources (HR) office of each College in consultation with their supervisors. CDC Guidance¹⁷ will be used for making ADA related accommodations on a case-by-case basis, along with municipal and county-level trend data resulting in increased positive case incidences.

9.3. Essential Staff

In the case of a closure, employees will be notified and essential staff will be informed about requirements for reporting to work through normal notification procedures.

9.4. State Guidance for Maintaining Essential Operations

State agencies and non-code agencies are encouraged to maintain essential operations while also balancing health concerns for employees and the public. Closure of office buildings and workplaces in Nebraska has not been required by the [Centers for Disease Control and Prevention guidance for Institutions of Higher Education](#) or the State of Nebraska to date¹⁸, and the State College System will draw upon this guidance when making the decision for building-related closures. If building closure is necessary, Colleges will draw upon their emergency operations plans for both working from home and maintaining necessary on-campus operations.

9.5. Employees Traveling out of State

Colleges will use the DHHS guidance for the types of out-of-state travel as outlined below:

¹⁶ [Directed Health Measure \(DHM\) order 2020-002](#) extended coverage to Lancaster, Dodge, Saunders and Washington counties through May 6, 2020. This expands the DHM established for Cass, Douglas and Sarpy counties which continues to April 30, 2020. Under these orders individuals who test positive for COVID-19 or have any two of the following symptoms: Fever 100.4 or above, cough, runny nose, sore throat, nausea and vomiting, shortness of breath should be home-quarantined. Appendix A provides the complete list of all Counties with DHM orders in place and their expiration dates.

¹⁷ The Center for Disease Control and Prevention released updated guidance on June 25, 2020, to assist organizations with making necessary accommodations for "[People of Any Age with Underlying Medical Conditions](#)," which outlines underlying medical conditions and general conditions that may put employees at increased risk of severe illness from COVID-19.

¹⁸ The [press release](#) from Governor Ricketts on March 19, 2020 outlines the expectations for Directed Health Measure (DHM) events which was first established for Cass, Douglas, Sarpy, and Washington Counties. Schools in DHM areas are directed to operate without students in their buildings until the date designated by the State. This restriction does not apply to school staff working in school buildings. Frequently asked question information when responding to whether office buildings must shut down in DHM designated counties indicated that "The DHM does not apply to places such as office buildings. . ."

- International Travel – All employees returning from international travel with widespread, sustained transmission¹⁹ should be self-quarantined for 14 days following their return.
- Out-of-State Travel – Starting June 1, 2020, returning travelers from outside of Nebraska will no longer be required to self-quarantine for 14 days²⁰, even if traveling through widespread transmission areas. Widespread transmission will be designated as large urban areas within the U.S. with more than 50 confirmed cases.²¹
- Commuters – Employees passing through a region with documented widespread transmission are not considered at-risk groups and will not be required to self-isolate.

9.6. Students & Employees Tested for Coronavirus

If a student or employee is experiencing symptoms identified in the state DHM and receive testing from their local health provider, each College will draw upon the guidance from the Regional Public Health District for self-isolation and notification of individuals who have come into direct contact if a positive test for COVID-19 is received.

Chadron State College – Any individual tested for COVID-19 will automatically be placed in self-isolation.²² If testing positive, the Panhandle Public Health District will work with those affected to assess contacts for the 14 days prior to the onset of symptoms. Those experiencing designated "close contact" will be contacted directly by the PPHD and provided guidance for self-isolation for 14 days. If no symptoms have emerged during this time period, individuals will be allowed to return to work.

Wayne State College – Employees experiencing symptoms of fever, cough, shortness of breath, sore throat or other symptoms of illness shall return home, and contact their medical provider or the health department for further direction.²³

9.7. Coronavirus Relief Package

Beginning April 2, 2020 NSCS Employees will be able to use Emergency Paid Sick Leave of up to 80 hours in accordance with the requirements outlined in the Families First Coronavirus Response Act (FFCRA).²⁴ The Act also provides for additional FMLA provisions for employees unable to work, either on campus or remotely due to the need to care for a child under the age

¹⁹ College personnel will draw upon CDC Guidance for [Warning Level 3, Avoid Nonessential Travel](#) which is frequently updated by the Center. Staff should evaluate the travel advisory recommendations when making a decision for making a self-quarantine decision for students.

²⁰ Governor Ricketts updated [Directed Health Measures](#) for June approved on May 21, 2020.

²¹ College personnel should use county level data available from the [Center for Systems Science and Engineering](#) at John Hopkins University to evaluate this confirmation threshold.

²² Per guidance from Kim Engle, Director of Panhandle Public Health District, provided on March 31, 2020. "Close contract" is defined as "People that have been within 6 feet of a positive patient; whereby work space layout and interactions will determine close contact in each office."

²³ Guidelines outlined by the Northeast Nebraska Public Health Department in its "COVID-19 Guidance for Area Businesses" dated March 31, 2020.

²⁴ The [Families First Coronavirus Response Act](#) was approved on March 18, 2020 and provides additional family leave provisions that will be adopted by the State College System. The detailed NSCS Guidance with Frequently Asked Questions document should be used to respond to employee questions.

of 18 due to the COVID-19 emergency. Employees seeking to use either of the new provisions in the FFCRA should work directly with HR staff at the College.

10. Student Reimbursements

10.1. Room and Board Refunds

In the event that in-person course delivery is no longer viable during any given academic term, Colleges will determine the appropriate proration of room and board refunds.

For those who are unable to leave or choose not to leave, the residence halls, dining services, and other student services will remain open.

10.2. Tuition and Fees Refunds

Refunds covering tuition and fee expenditures will not be awarded to students when online, hybrid, and remote instruction options are provided to ensure the successful completion of academic credit for all students.

11. CARES Act – Higher Education Emergency Relief Fund (HEERF)- Student Support

11.1. Certification Requirements

The College official who signs the [Recipient's Funding Certification and Agreement](#) Emergency Financial Aid Grants to Students under the Coronavirus Aid, Relief, and Economic Security (CARES) Act form shall be the College designee legally obligated to sign non-Title IV federal grant applications, or the College President.²⁵

11.2. Distribution Timeline

Colleges may begin making HEERF awards to students once funds become available from the U.S. Department of Education (U.S. DOE). Colleges may draw upon existing data and/or survey data collected through an application form to determine how to allocate funds directly to students. A portion of the funds may be distributed for students enrolled during the Spring 2020 term for students experiencing significant disruption due to the Coronavirus. If funds from the U.S. DOE do not become available until after May 8, 2020, Colleges may still make HEERF awards to any student who was enrolled during the Spring 2020 term. Colleges may designate a pool of HEERF funds to support future disruptions that are likely for students enrolled during the Summer 2020, Fall 2020, and Spring 2021 terms. Notification of awards can be made to students prior to the beginning of the Summer 2020, Fall 2020, or Spring 2021 terms to be used during those terms. When making awards beyond the Spring 2020 term, the College shall be prepared to document how HEERF funds are resulting in emergency grants directly linked to the Coronavirus. Disbursement of HEERF funds to these students shall occur during a time established by the College to fall within the start and end date for the specific

²⁵ Guidance provided by the National Association of Student Financial Aid Administrators (NASFAA) organization, in [Frequently Asked Questions](#) response to members on April 12, 2020.

term for which the funds are awarded. Spring 2021 disbursements shall occur between January 11, 2021 and March 27, 2021.

All funds must be distributed prior to April, 1 2021 or returned to the U.S. DOE. Any State College that does not use the dollars allocated to its campus under the U.S. DOE formula, shall request re-distribution to another Nebraska State College before returning unused funds.

11.3. Eligible Students

Only students who are eligible to participate in programs under [Section 484 in Title IV of the Higher Education Act of 1965](#) (see page 575) may receive HEERF awards.²⁶ Eligible students must have filed a FASFA and:

- Must be a regular student enrolled in an eligible program;
- Must be qualified to study at the postsecondary level – such as having a high school diploma or completed homeschooling;
- Must be making satisfactory academic progress per the school's satisfactory academic progress policy;
- Cannot have a federal or state drug conviction that occurred during a period of enrollment for which the student was receiving federal student aid;
- Must be a US citizen or eligible non-citizen;
- Cannot be in default on a federal student aid loan or owe an overpayment on a federal student aid grant or loan;
- Must provide a correct social security number;
- Cannot have exceeded the annual or aggregate loan limits;
- Must have completely repaid fraudulently obtained funds if student had been convicted of, or pled no contest or guilty to a crime involving fraud in obtaining FSA funds;
- Cannot have property subject to a judgment lien for a debt owed to the United States.
- Who is male and aged 18-25 must be registered with the Selective Service System or be exempt from registering;

In addition to the requirements outlined above, Colleges may only make awards to those students who completed the FASFA and were enrolled in one or more courses during the Spring 2020 term that were transitioned to remote delivery. Additional exclusions include students enrolled in dual credit or early entry courses, International, and DACA students.

11.4. Allowable Expenditures

Colleges shall not reimburse themselves using CARES Act funding that is earmarked to provide HEERF awards directly to students and may not be used to cover outstanding balances for room, board, tuition, or fees. These funds may not be used to reimburse College funds (i.e., outstanding room, board, tuition, and fees) it has already provided to students prior to when the College began drawing down HEERF funds. This is also true for any refunds of institutional charges the College previously provided to students. Each College shall be prepared to report to the U.S. DOE how grants were distributed to students, how the amount of each grant was calculated, and any instructions or directions that the institution gave to students about the awards.

²⁶ [Letter](#) from U.S. DOE Secretary of Education Betsy DeVos detailing expectations for the use of HEERF funds.

Funds are expected to provide aid to students for expenses related to the disruption of campus operations due to Coronavirus. These expenses may include items such as food, housing, course materials, technology, health care, and child-care expenses. Colleges shall not award HEERF dollars directly to student accounts to cover student tuition and fee expenditures.

Colleges shall not use the advanced funds to reimburse themselves for any costs or expenses, including but not limited to any costs associated with significant changes to the delivery of instruction due to the Coronavirus and/or any refunds or other benefits that the Colleges previously issued to students.²⁷

11.5. Distribution Method & Award Amounts

HEERF dollars shall be distributed as a direct payment to students, and may not be applied as credit to a student account.²⁸ The U.S. DOE has recommended that aid not exceed \$6,195 (equivalent to the 2019-20 Pell award amounts), but each College may determine the appropriate amounts based on the methodology that works best for its Emergency Relief program.²⁹

The IRS has issued guidance noting that awards will not be designated as taxable income for students but Colleges shall implement processes for tracking HEERF awards. Awards shall be processed through the student financial aid account system using a method that allows for processing of the full amount of a HEERF award, even if there are existing balances on a student account. Processes shall also be in place that ensures for reporting in Box 5 of the student 1098-T.

HEERF awards shall not be used in the calculation of student or parent income for the calculation of expected family contribution (EFC) or as (EFA) when future packaging for students occurs. This applies to any funds a student receives from an IRS stimulus check.³⁰

12. CARES Act HEERF – Institutional Portion

12.1. Certification & Institutional Eligibility Requirements

The College President shall be responsible for signing the [Recipient's Funding Certification and Agreement](#) for the Institutional Portion of the Higher Education Relief Fund Formula Grants under the CARES Act. To be eligible to receive the institutional portion of the available funds, the College must first submit the Certification for the HEERF with the intent to distribute available funds under the requirements outlined for that program.

12.2. Allowable Expenditures

²⁷ Guidance provided by NASFAA in response to a FAQ related to [Allowable Reimbursements](#) from members on April 13, 2020.

²⁸ Email guidance provided by Senior Director of Government Affairs at the National Association of College and University Business Officers.

²⁹ Guidance [letter](#) from U.S. Department of Education Secretary DeVos on April 9, 2020.

³⁰ Guidance provided by NASFAA in response to a FAQ related to [Estimated Financial Assistance](#) from members on April 4, 2020.

Colleges may use the institutional portion of the CARES Act funds to cover any costs associated with significant changes to the delivery of instruction due to the Coronavirus.³¹ Allowable expenditures include:

- Institutional costs to expand remote learning programs, and/or build IT capacity required to support such a program, to include salaries of staff training faculty in new technology and enhanced online education techniques;
- Reimbursement to the College for refunds to student room and board, tuition, and other fees that were made on or after March 13, 2020;
- Reimbursement to the college for the purchase of laptops, hotspots, or other instructional technology equipment and software to enable students to participate in distance learning as a result of the transition to remote delivery;
- Salaries of staff who assist students with a transition to on-line education;
- Salaries of staff training faculty in new technology and enhanced online education techniques;
- Expenses for external services and staff tasked with converting class sessions from synchronous to asynchronous delivery;
- Expenses of expanding library access and converting to exclusively online delivery of materials;
- Expenses to conduct academic advising sessions virtually;
- Increased student services expenses for counseling, tutoring and other services, to help with the transition to online learning;
- Expenses for retooling vocational labs for future months. Many programs must have hands on learning to offer degrees and certificates. The hands-on experience will need to accommodate with social distancing and limit the use of shared tools;
- Costs related to sanitizing and social distancing while providing classroom education, if students are returning in the summer and fall;
- Redeployed IT programmers and other technicians to increase capacity or modify certain courses;
- Staff salaries to handle increased calls for online support or helpdesks;
- Delivering meals to high need students and extra cleaning and sanitizing of related facilities; and
- Any grant overhead (indirect cost) allocation for the above that can be documented by the College.

12.3. Use of Funds for Emergency Financial Aid

Colleges that have additional funds available after addressing costs associated with significant changes to the delivery of instruction may use those funds to provide additional support for students with the most significant financial needs arising from the pandemic. Eligible expenditures include those expenses arising from a student's cost of attendance (course materials, technology, health care, childcare, food, and housing). Colleges shall use the student eligibility requirements outlined under the "HEERF" section of these guidelines when making awards using Institutional portion of the CARES Act funds.

³¹ [Letter](#) from U.S. DOE Secretary of Education Betsy DeVos detailing expectations for the use of Institutional funds along with guidance provided by the National Association of College and University Business Offices in [Discussion Thread](#) among members.

12.4. Reporting Requirements

Colleges shall report the use of the funds for institutional costs by accounting for the amount of reimbursements made to students for housing, food, or other services. They shall also outline the internal controls the Colleges have in place to ensure funds are used for allowable purposes and in accordance with cash management principles.³²

13. Finance and Accounting

13.1. Federal COVID-19 Financial Resources

All Federal resources received through House Resolution 6201 – The Families First Coronavirus Response Act (FFCRA) or the Coronavirus Aid, Relief, and Economic Security (CARES) Act shall be accounted for at the College through the creation of a new Business Unit that incorporates the value “COVID-19” in Category Code 21.³³ No COVID-19 activity shall be co-mingled in any existing business units. If resources are obtained through H.R. 6201, the College must notify the System office so the appropriate notification can be provided to State Accounting and the designated State Budget Division analyst. Additional federal fund expenditure authority may need to be requested.

³² [Frequently Asked Question](#) guidance provided by the U.S. Department of education on April 21, 2020.

³³ Per a Memorandum entitled “COVID-19 Federal Funding Guidance” from Gerry Oligmueller, State Budget Administrator and Phil Olsen, State Accounting Administrator dated March 24, 2020.