

Covid -19 Guidance for Private Schools

School Closures, Instructional Day Requirements, and Waivers

1. Are private schools ordered to close?

We urge you to follow the recommendations of the Governor to remain closed until April 24 like all public schools.

2. Do private schools have to submit a waiver request now?

Mark on calendars stock pile v. waiver. Pursuant to HB 2818/SB2672 that passed late last week, the commissioner will be granting a blanket waiver for all instructional days missed due to COVID-19 and the tornado and severe weather that impacted middle Tennessee on March 3. If private schools choose to use any stockpile days they have left for closures due to COVID-19 or the tornado, they should simply update calendars and submit to their accrediting agency. For more information, see [this FAQ document on school closure](#).

Continuity of Instruction Plans (CIPs)

3. Are Category I, II, III and IV private schools required to submit a CIP for the department's approval and if so, what kind of detail is the Commissioner looking for with school CIPs?

Pursuant to HB 2818/SB2672 that passed late last week, the commissioner will be granting a blanket waiver for all instructional days missed due to COVID-19 and the tornado and severe weather that impacted middle Tennessee on March 3. There is no requirement to submit a CIP for those days to be waived.

Graduation, Credits and Credit Recovery

4. What are we to do around student report card grades?

The State Board of Education (SBE) rules address attendance, grading, promotion, and retention policies. Additionally, the SBE rules set course and graduation requirements. In response to the passage of HB 2818/SB2672, the SBE is scheduling a special called meeting in April to promulgate rules to implement the new law. Such rules will address the issues referenced above. The department will provide guidance on these rules once the SBE passes them.

5. Has consideration been given to Pass/Fail grades for high school credit classes vs. numeric grades?

The SBE rules address attendance, grading, promotion, and retention policies. Additionally, the SBE rules set course and graduation requirements. In response to the passage of HB 2818/SB2672, the SBE is scheduling a special called meeting in April to promulgate rules to implement the new law. Such rules will address the issues referenced above. The department will provide guidance on these rules once the SBE passes them.

Graduation Requirements**6. What happens if districts/private schools lose the 4th quarter?**

The SBE determines graduation requirements. At this point, districts should work to allow students to graduate without summative assessments, including the required college entrance exam (ACT/SAT). The SBE rules address local school district attendance, grading, promotion, and retention policies. Additionally, the SBE rules set course and graduation requirements. In response to the passage of HB 2818/SB2672, the SBE is scheduling a special called meeting in April to promulgate rules to implement the new law. Such rules will address the issues referenced above. The department will provide guidance on these new rules once the SBE passes them. For more information, refer to the forthcoming FAQ document regarding graduation requirements.

7. How will seniors graduate if there is no 4th quarter?

See response above.

8. If districts/private schools let a senior graduate and they do not take certain courses, will THEC allow them to come into their university without doing remediation, etc.?

See response above.

9. Does the department anticipate altering the high school graduation requirements (presumably with the SBE) or allow district/private schools to give students credit for classes based on the reduced instruction this semester? If the former, does that mean that underclass cohorts for the next few years will have altered graduation requirements as well?

See response above.

Testing and Assessment

10. Are private schools still required to provide a norm referenced assessment this year?

No. Like public schools, private schools will be exempt from annual testing this school year.

Technology: Internet and device access

11. Please provide guidance around the lack of internet access for students/families.

a. Wireless Options

- i. Verizon Wireless: Verizon Wireless is currently under state contract, and devices are \$0 cost. Service is \$35/month for high utilization and \$24/month for low utilization.
- ii. T-Mobile: There is currently a \$0 cost for devices and a \$35/month per user for unlimited bandwidth.
- iii. Comcast: Comcast currently has a program for low-income families to obtain internet service. This service is normally \$10/month (Internet Essentials program). However, under COVID guidelines, Comcast is waiving the cost for two (2) months. This does not provide super high-speed internet, but does provide basic access. Information related to this is provided below.

b. Device Options

- i. The department is currently working with Dell, Microsoft, and SHI as a reseller to provide low-cost options across manufacturers.
 - ii. Comcast also has devices under their Internet Essentials program. More information can be found at:
<https://corporate.comcast.com/press/releases/internet-essentials-low-income-broadbandcoronavirus-pandemic>.
 - iii. The average cost for devices will be between \$100- \$149 per device.
 - iv. Options for lease are limited due to financing conditions and no guarantee on equipment quality on return.
- c. Refer to the [FAQ on IT Resources](#) for more information.

12. Continuing to meet instructional goals during a long-term closure will be very difficult for rural districts. Technology equipment and reliable internet services are not available to many students. Districts need guidance ASAP.

See above response.

13. My technology director implied districts would have to pay for additional filtering for devices if they are sent home (about \$7 per student) Would that be required?

To continue to provide students with proper internet controls and follow Children's Internet Protection Act (CIPA) requirements, filtering controls would still be necessary. Two options include:

- Utilize free products deployed through mobile device management for endpoint content filtering (e.g.: Cisco Umbrella is currently being offered for free).
- Use existing VPN access into the school system to leverage controls already in place.
- The department will continue to explore additional supports in this area.

14. Will the department speak to efforts regarding collaborating with cell phone providers to open up hot spots for internet access? The free 2 months require a credit card to be charged at the end of the 2 months, which some families may not be able to provide.

The department has been in contact with all major internet providers to determine potential options for districts, schools, and families and will continue to update the [FAQ on IT Resources](#) with more information as available.

15. Would the department consider putting together a toolkit for parents to support their students' instruction?

The department is in the process of developing a resource for parents, which consolidates multiple sources and topics for parent-facing guidance.

16. Is there any guidance available related to TSSAA (Spring Sports) and events like Spring Fling?

The department recommends school districts and private schools work with the TSSAA and the local board attorney to make decisions that adhere to the guidance of the CDC, the Tennessee Department of Health, and other public health authorities.

17. Will there be guidance forthcoming for delivering instruction in the event of a more prolonged closure?

Many districts are providing guidance on delivering instruction, and the department's COVID-19 website has a resource [here](#). The department's website, <https://www.tn.gov/education/health-and-safety/update-on-coronavirus.html> has a variety of resources and is being updated continuously.

18. We have fewer than 50 students. Are we mandated to close due to these guidelines?

No, you are not mandated to close by the Governor, but there is a strong recommendation to close schools until the end of April, along with the guidance that groups of 10 or more people shouldn't gather. Please check the department's website daily for updates and further guidance:

<https://www.tn.gov/education/health-and-safety/update-on-coronavirus.html>.

19. Although we are not traditionally allowed to offer online education as a Category V school, under these conditions, are we allowed to provide class materials and instruction online to count as enrollment days if we have to close? If not, are these strictly days that must be made up at the end of the year, or will TN DOE waive the 180-day requirement?

As a Category V school acknowledged for operation by the department, you should follow the guidance provided on the department's website [here](#), and check back each day for any updates. In particular, [here](#) is guidance on continuity of instruction. Local Education Agencies (LEAs) or districts can request a waiver of the 180-day requirement, which would pertain to Category V schools. The department website contains all of the relevant information.

20. I noticed a number of new guidelines today. Do all these apply to Category 5 private schools, as well?

As a Category 5 school acknowledged by the state, you should follow the guidelines provided on the department's COVID-19 [website](#), as well as the Local Education Agency (LEA) or district that you fall under.

21. We have requested that all our schools close as soon as they are able until the end of April. To clarify, these closures should include daycare, correct?

If you are receiving any state funding for daycare or Head Start, then yes, you should close those as well. The department's COVID-19 [website](#) is being updated daily, and you can check it for any guidance, though as an accrediting agency for Cat IV schools, you can provide your own guidance to the schools.

22. Current law requires independent homeschoolers to engage in "the same number of instructional days as are required by state law for public schools." Does that mean that the number of days required for homeschoolers would be waived to the same extent that the local school district's is waived under this new law?

Yes, the Local Education Agency (LEA) or district superintendent can submit a waiver for required instructional days. The independent homeschooled should contact their district's homeschool coordinator for more information. If you need help finding the homeschool coordinator at your LEA, contact linda.hayes@tn.gov. Also, please see the department's COVID-19 website daily for updates at <https://www.tn.gov/education/health-and-safety/update-on-coronavirus.html>.