COVID-19 Plan

All Education Affiliates’ schools as listed, below (hereinafter “Schools”) have adjusted, and continue to be prepared to adjust operations to continue to engage and serve students during the COVID-19 pandemic pursuant to the below plan:

- All-State Career in Baltimore, Maryland (#M059349)
- All-State Career School in West Mifflin, Pennsylvania (#B059271)
- Fortis College in Houston, Texas (#B072632)
- Fortis Institute in Houston, Texas (#B072633)
- All-State Career School in Essington, Pennsylvania (#M051873)
- Fortis College in Centerville, Ohio (#M000648)
- Fortis College in Cutler Bay, Florida (#B072358)
- Fortis College in Indianapolis, Indiana (#B072275)
- Fortis College in Cuyahoga Falls, Ohio (#M000288)
- Fortis Institute in Cookeville, Tennessee (#B072636)
- Fortis College in Salt Lake City, Utah (#B072216)
- Fortis College in Orange Park, Florida (#M073112)
- Fortis Institute in Forty Fort, Pennsylvania (#M068505)
- Fortis Institute in Scranton, Pennsylvania (#M068504)

At the time of this update, Schools’ operational responses to the COVID-19 pandemic continue to be a fluid process, as most states continue to dictate that schools remain closed to physical, on-site instruction; and as schools are or will be allowed to reopen their campuses to physical instruction, certain COVID-19 affected students will remain unable to physically attend campus meetings due to COVID-19 circumstances and limitations. As such, and in order to operate carefully with the safety and health of our students and staff in mind, temporary approval for use of remote modalities by all programs remains necessary presently, and will remain necessary until states uniformly authorize return to full on-site instruction with no capacity or student/faculty/staff density limitations – limitations which in our assessment will remain in place through at least September 1.

It is important to emphasize that while we are seeking approval for remote modalities at this time through the end of September, we continue to seek approval for temporary adjustment to normal operations. At this time, we are not seeking permanent approval, and do not wish to revise Schools’ grants of accreditation. Instead, via this update, the Schools seek approval to continue the emergency, temporary delivery via remote modalities, which remain presently necessary due to the COVID-19 pandemic. Once Schools are allowed to return to normal operations and are able to do so without significantly jeopardizing safety, health, or educational quality for students, staff and faculty, the Schools intend to do so.

1 In considering our request for approval through the end of September, we ask ACCSC to additionally consider: (a) that schools are not in a position to guess at what public policy will be in the coming weeks and months as the reality of the COVID-19 pandemic emergency continues, and (b) that returning to normal operations in a way that serves the safety, health, and educational quality needs of our students, faculty and staff will take time, and must be planned for a quarter or semester ahead of time. It is neither practical nor desirable to bring back students, faculty and support staff ‘overnight’ once public policy decisions are made at state and local governmental levels.
Continued Need for Temporary Distance Education Delivery

Below are updated answers to the original questions ACCSC requested Schools answer in order to gain temporary distance education approval:

1. A copy of the school’s contingency plan in preparation for possible quarantines or limits to in-person learning.

As detailed in the Schools’ original COVID-19 Plan submitted in March, as Schools were required to move to remote instructional modalities, each affected student was directed by the Schools’ faculty and/or administrative staff to first complete the document provided as Qualifying for Distance Education Delivery that is available upon request. In addition, the document provided as Distance Education Delivery Policy and Guidelines for Students that is available upon request was reviewed with each student, and the student was required to sign a copy of the document provided as Distance Education Delivery Agreement that is available upon request. Students then continue communications with applicable faculty members via: Zoom and other video conferencing, Canvas, Blackboard, Jupiter, the Student Portal/MyCampusLink, email, telephone communication, and other remote methods, as needed, to engage each student.

In completing the above, each School has assessed and assured each student’s capability to successfully participate in the delivery method in the following manner:

1. By documenting each student’s participation in remote classroom activities
2. By tracking student participation in our Student Portal, as well as, the School’s CampusVue system
3. Via Education Affiliates’ corporate audit functions which examine student engagement during use of these temporary alternative learning modalities.

To facilitate continued delivery of high quality educational content in the swift transition to remote modalities which was required, instructors who excel at online delivery of certain course subjects have been identified as national lead instructors, and in certain cases, those faculty now assist with the delivery of certain course content at institutions other than their assigned home campus. To facilitate this, the Schools have entered into a National COVID-19 Consortium Agreement that is available upon request, and seek approval of this consortium agreement as part of this COVID-19 Plan Update submission. The Consortium Agreement identifies the third-parties (each of which are fully accredited institutions in the Education Affiliates system of schools), as well as, the services to be provided under the contract (delivery of equivalent online course content), and is itself a copy of the agreement. Each ACCSC accredited home institution, or School, retains responsibility for compliance with all ACCSC requirements.

2. A copy of the school’s plan to notify and assist students with modified learning environment to include the following:

The notification to students is provided as Distance Education Delivery Policy and Guidelines for Students that is available upon request. The plan to assist students with the modified learning environment is below:
a. Description of programs/classes impacted, including didactic/lab hours as appropriate.

Effective the date of this COVID-19 Plan Update, all schools’ programs and classes remain impacted, and are being delivered via remote modalities. However, some schools are allowed to bring limited groups of students to campus for certain class functions, such as simulation and laboratory activities. **Schools’ Current Program Enrollment that is available upon request** provides the updated number of students who remain impacted by school, program and course as a result of the COVID-19 pandemic.

As discussed in further detail above, the anticipated timeframe that the Schools expect to return to normal operations may vary by school, as the days and weeks progress, since the COVID-19 pandemic situation is fluid. Approval for use of remote modalities by all programs remains necessary presently, and will remain necessary until states uniformly authorize return to full on-site instruction with no capacity or student/faculty/staff density limitations – limitations which in our assessment will remain in place through at least September.

b. Effective date of change in delivery method and/or cancelling face-to-face classes.

As stated on the ACCSC Contingency Plan Acknowledgement dated March 23, 2020, the effective date of change was March 17, 2020.

c. Description of delivery method (i.e., Skype, Distance Education Platform, Go-to-Meeting, etc.)

Schools will continue to utilize Zoom and other video conferencing, Canvas, Blackboard, Jupiter, the Student Portal/MyCampusLink, email, telephone communication, and other remote methods, as needed, to appropriately engage each affected student and/or class.

d. Support for students

Faculty and technology support will continue to be provided for students. Qualified students who sign a **Distance Education Delivery Agreement (available upon request)** are provided with the faculty member’s email address and phone number for each of their courses, and are directed to contact the faculty member(s) with any questions. Students utilize a variety of delivery platforms to access educational resources including Zoom and other video conferencing, Canvas, Blackboard, Jupiter, the Student Portal/MyCampusLink, email, telephone communication, and other remote methods.

All students continue to have access to LIRN (the comprehensive research materials database described in **LIRN Outline that is available upon request**), via the following link, user name, and password:

https://proxy.lirn.net/EducationAffiliates
54469
coldberry14.

Students and faculty can also ask questions/obtain assistance remotely on the LRC website (found at the below link – there is a form on the right).
https://libguides.yourlrc.info/LIRN

i. Management oversight;

Schools document and track remote student attendance in CampusVue. Schools also document and track actions taken that deviate from standard business practices via the document provided as Campus Tracking Spreadsheet *(available upon request)*. Students are also asked to keep a similar log of their own Student Activity Log *(available upon request)*.

Prior to the COVID-19 pandemic, most EA Schools already provided hybrid training, and as a school system, we have extensive local and corporate experience in delivering online content and distance education.

Administrative oversight is provided at both the local and national levels for distance education activities and clinical/externship experiences: Locally, all instructors have been trained on the various modalities being utilized (these include a Student Portal, Canvas, Zoom, and CampusVue systems).

Nationally, each EA School’s education managers (including directors of education, deans of education, and program directors) are ensuring that syllabi and lesson plans are being uploaded and delivered in accordance with our approved curriculum with as few changes as is practical.

We have had training with all of our Program Directors regarding transitioning to distance delivery that includes both synchronous and asynchronous elements.

ii. Technology support as appropriate; and

Almost all Schools have a technology manager locally, and for those that do not, Education Affiliates has a robust IT department at the corporate office to trouble shoot issues, and to assist in seamless content delivery ensuring the seamless delivery of education to maintain the continuity of our academic operations.

iii. Access to faculty (i.e., phone, email, DE platform, etc.)

Qualified students who sign a Distance Education Delivery Agreement *(available upon request)* will be provided with the faculty member’s email address and phone number, for each of their courses, and directed to contact the faculty member(s) with any questions.

e. Description of how students will access educational resources like LRS, other learning materials/resources.

All students continue to have access to LIRN, the comprehensive research materials database described in LIRN Outline *(available upon request)*, via the following link, user name, and password:

https://proxy.lirn.net/EducationAffiliates
54469
Students and faculty can also ask questions/obtain assistance remotely on the LRC website (found at the below link – there is a form on the right).

https://libguides.yourlrc.info/LIRN

3. For schools with allied health programs – please describe school’s plan for making up clinical experience/practicums as needed.

Please see below section on ‘Disruption of Clinical, Practicum, or Externship Experiences’ for plan regarding making-up clinical and externship experiences as needed.

4. Periodic updates to ACCSC as to when the school expects to return to normal operations.

Schools will continuously reassess needs with respect to COVID-19 policies, and will provide ACCSC with a formal update prior to expiration of the approval for these temporary measures in September 2020.

Disruption of Clinical, Practicum, or Externship Experiences

1. Expected timeline for suspension of the experience, including re-evaluation of suspension.

If/when it is not possible or appropriate to utilize equivalent simulation experiences, for term starts April 20, 2020 and forward, the experience is rescheduled for the student after classes return to normal, utilizing an incomplete grade and/or leave of absence function.

To reinforce the above, Education Affiliates is requiring that all Schools’ allied health externships follow alternative clinical, practicum or externship procedures (further explained in subsection 2, immediately below), beginning with the term starting April 20, 2020, for the remainder of the COVID-19 pandemic emergency.

2. A copy of the school’s plan to make up time and/or options for students.

In each event that a clinical or externship experience is impacted due to unavailability of the site, or other COVID-19 circumstance or restriction, the relevant school first seeks to identify options to move students to sites that are still available and willing to accept students.

If/when it is not possible to identify an alternate site for a student or class, equivalent simulations are utilized instead, where possible and appropriate based upon relevant accreditation, state, and federal requirements and other practical considerations.

To reinforce the above, Education Affiliates is requiring that all Schools’ allied health externships follow the below procedure, beginning with the term starting April 20, 2020, for the remainder of the COVID-19 pandemic emergency:
If a student is unable to attend at a site, the student must participate in weekly online skills demonstrations, virtual lab, simulations, and online certification preparation boot-camps led by the program director or qualified program instructor for at least 1 hour each week.

In the absence of any federal, state, and or credentialing regulations prohibiting alternative methods, the online skills demonstrations, virtual lab, simulation hours will be counted toward the required externship hours.

The Schools are also convening remote meetings of the Program Advisory Committees meetings to obtain their suggestions.

**Extended Absences for Students**

1. A copy of the school’s plan to accommodate students who may be unable to attend classes due to exposure to COVID-19 or illness from the virus, including Leave of Absence and/or waiver of attendance policy.

   Students who are unable to attend either traditionally or via the temporary distance education measures will receive an incomplete grade, and/or be placed on a leave of absence, as appropriate. Upon the student’s return from leave of absence, their class schedule will be revised to accommodate the make-up or re-take of work and/or courses missed.

2. How the school will assist students returning to classes to make up the work missed.

   Missed instructional time will be made-up by rescheduling course activities for the student after classes return to normal, utilizing an incomplete grade function or following an approved leave of absence.