

State Policy Covid-19 Response Toolkit

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The onset of the COVID-19 pandemic has starkly illuminated fissures in our public systems, including healthcare, human services and social assistance, and workforce among others. Every state is already or slated to experience unprecedented job loss and subsequent strain on public assistance programs ranging from unemployment insurance to cash and nutrition assistance and Medicaid. But even in the face of these disruptions, there are tangible steps that states can take *now* to insulate their workers, families and businesses from the worst fallout from this crisis. At National Skills Coalition, we are calling on policymakers to come together to use policies and resources to immediately protect and support workers and small businesses. This toolkit is designed to give states tangible examples of state policy actions they can endorse or enact immediately to support workers who need immediate assistance in the face of COVID-19-related economic disruptions. It also provides examples of how states are responding to rapid re-employment and upskilling needs in impacted industries.

This document presents a compilation of what state actors—including governors, agencies, policymakers, businesses and advocacy organizations—are doing now to respond to the crisis. Among these examples are steps that states should take now to serve workers, families and communities and as the economy recovers. Additionally, there are state actions that, depending on context, region, industry mix and other factors, may serve as an example for states to enact or craft their own policy responses.

Even more crucial in the face of this emergency, is the need for policymakers and advocates to enact policy and practice changes leading *with an equity lens*. As states consider enacting policies in this toolkit, they should keep equity in mind. Vulnerable populations like low-income workers and families, immigrants, people of color, returning citizens and justice-involved youth, and unemployed and underemployed individuals are doubly vulnerable in the face of this crisis. States must engage in advocacy for inclusive administrative and legislative policies to respond to COVID-19, paying special attention to include and prioritize the needs of these and other populations.



Remove all barriers to our nation's safety net: Immediately remove barriers to the existing federal safety net including health, food, housing, and cash assistance.

Halt work requirements, eligibility bans, terminations, etc. and other potential administrative actions to extend program eligibility to vulnerable populations.

1. *Medicaid*

- a. States can streamline Medicaid eligibility and enrollment processes to ensure that all eligible individuals have full access to the treatment that they need for all of their medical needs, including testing positive for COVID-19.
 - i. Pennsylvania is encouraging displaced workers and their families to [take advantage of public insurance options and Special Enrollment Periods \(SEP\)](#) available for the Affordable Care Act, Medicaid and CHIP during the pandemic following a job separation or sudden loss of income.
- b. States should reject policy proposals that call for [Medicaid work requirements](#) and cease implementation of such requirements.
- c. States can temporarily suspend or delay case renewals and end case reviews for people currently enrolled in Medicaid.
 - i. People insured through Medicaid must renew their eligibility, usually every 12 months, to continue receiving health insurance. When renewals are not completed on time, beneficiaries experience a period of uninsurance and may delay getting needed care. To ensure coverage, states should temporarily suspend case renewals and [explore automated *ex parte* renewal systems like Washington state's](#) following the economic recovery.

2. *Supplemental Nutrition Assistance Program (SNAP)*

- a. [The Families First Coronavirus Response Act](#) (FFCRA) suspends the three-month time limit for able-bodied adults without dependents (ABAWDS) effective April 1 in every state. Previously, ABAWDs not engaged in work or training were only eligible for a maximum three months of SNAP benefits within a three-year term.
 - i. The Administration's plan to limit states' ability to waive the three-month rule in areas of high unemployment is [currently under court injunction](#). If this plan fails to move forward, states will retain the ability to request waivers to remove the time limit, allowing states to request a waiver if it qualifies for extra weeks of UI through the Extended Benefits (EB) program due to high unemployment. In the longer-term, states experiencing hardship and high unemployment as a result of coronavirus business disruptions should consider requesting a waiver to extend additional benefits to affected workers.

- b. States can extend SNAP certification periods and modify other requirements (e.g., interview, telephonic signature, verification) to both maintain enrollment in SNAP as well as SNAP E&T and get more people enrolled.
 - i. SNAP recipients must regularly “recertify” their eligibility in order to continue receiving SNAP. Extending SNAP certification periods will lessen the administrative burden on families receiving food assistance during the crisis. States can extend these periods up to 24 months.
 - ii. The FFCRA also “[gives USDA and states broad flexibility to adjust administrative requirements to manage workload.](#)” With this new flexibility, states can choose to extend SNAP certification periods; more quickly certify households newly applying for SNAP; waive the requirement that applicants be interviewed by a state eligibility worker; ease paper verification requirements; expand expedited benefits criteria; and other operational changes..
 - c. Encourage state agencies to change rules that establish mandatory SNAP E&T participation for food assistance recipients for the remainder of the crisis and ensuing recession. In the longer term, explore a permanent change to voluntary SNAP E&T participation statewide.
 - i. [Georgia Budget and Policy Institute \(GBPI\) issued a blog](#) calling on its governor to enact these measures (and provide budgetary support for caseworkers).
3. *Temporary Assistance for Needy Families (TANF)*
- a. States should institute an immediate moratorium on sanctions and terminations from TANF benefits for the remainder of the crisis and ensuing recession. Suspend TANF work and work-reporting requirements. Generally, TANF recipients are required to complete a minimum number of work activities (work, job search, job skills training, etc.) per week and report these activities to their state Department of Human Services to retain eligibility.
 - i. States can grant an across-the-board “good cause” exemption from work and work-reporting requirements for all COVID-19 related impacts (direct or indirect), including people who are ill, caring for a child whose school or day care is closed due to the pandemic, or because their work or training site is closed. HHS has indicated that they cannot waive work participation rates but can grant good cause exemptions and “[will exercise this authority to the maximum extent possible](#)” during the pandemic.
 - b. States should also consider reallocating resources to support [subsidized employment](#), as was done under the American Recovery and Reinvestment Act (ARRA) during the recession. While the funding mechanism under ARRA can no longer be applied, states can replicate subsidized employment with current TANF resources.

- i. While the structure of TANF Emergency Fund-supported subsidized employment programs under ARRA varied, they generally sought to create job opportunities for dislocated workers so they could earn an immediate income and build experience and skills.

Cash assistance and other payments to help affected workers, families and businesses:

1. *Temporary Assistance for Needy Families (TANF)*

- a. TANF provides time-limited cash assistance and other services to low-income families, primarily those with children and families headed by single mothers. TANF provides fixed block grant funding that the 50 states, Washington D.C., U.S. territories and Native American tribes share totaling \$16.5 billion per year. Expenditures are not limited to TANF recipients and states have broad discretion in determining income thresholds for receipt.
 - i. States with surplus funds should consider how to best disburse those funds so they reach families in need. Indiana Institute for Working Families (IIWF) is recommending the Indiana Family and Social Services Agency use TANF surplus funds to send cash assistance directly to SNAP households with children. Based on IIWF estimates, each family that qualifies could receive a \$400 cash payment for four months.

Provide comprehensive income, healthcare, and re-training support to all displaced workers: Guarantee access to income replacement, healthcare, and re-training for any displaced worker, including contingent workers.

Unemployment insurance or UI provides workers who have been laid off with a percentage of their weekly earnings to help them maintain financial security until they reconnect to work.

1. *States should consider implementing one or more administrative rule changes to ease and extend access to Unemployment Insurance benefits for laid off workers.*
 - a. Now that the CARES Act provides up to 13 additional weeks of federally funded extended benefits (EB) to people who exhaust their regular state benefits, displaced workers can receive a maximum of 39 weeks of UI benefits this year. To ensure workers and their families receive essential wage replacement for the remainder of this crisis and recovery, [states should consider extending Unemployment Insurance benefits to the standard 26 weeks](#). Most states provide the 26-week maximum.¹
 - b. States should waive job-search requirements and waiting periods for UI benefits eligibility. Generally, while receiving Unemployment Insurance benefits, claimants must be able, available and actively searching for suitable work while registered with a local employment center. Before the crisis, most states required claimants to wait one week after job separation before claiming UI benefits
 - i. Georgia [just adopted a rule](#) exempting residents from work search activities to claim UI after 3/14. [Wisconsin](#) (via [executive order](#)) and other states are following suit.
 - ii. [Pennsylvania](#) has suspended its waiting week. [Wisconsin](#) has asked its state legislature to repeal the waiting week. [Iowa](#) and other states are following suit. For a more comprehensive list on what and how states are expanding access to UI benefits, refer to the [National Employment Law Project's policy brief](#).
 - c. States should exempt COVID-19 related unemployment claims from the Employer Experience Rating. Exempting COVID-19 related claims will help assure that employers do not attempt to discourage employees from filing claims.

¹ Of the states not providing the standard 26-week maximum: Massachusetts provides 30 weeks, except during periods of low unemployment, when it provides 26; Montana provides up to 28 weeks of UI; Michigan normally provides up to 20 weeks, but has risen to 26 during the crisis; Arkansas and South Carolina both provide up to 20 weeks; and Missouri provides up to 13 weeks of UI. The remaining six states periodically update their maximum weeks of UI based on changes to the state unemployment rate: Idaho currently provides up to 21 weeks of UI; Kansas normally provides 16 weeks, but has increased to 26 through April 2021; Alabama provides up to 14 weeks for new enrollees with an additional five-week extension for those enrolled in a state-approved training program; Georgia normally provides up to 14 weeks, but has increased to 26 weeks during the crisis; and Florida and North Carolina currently provide up to 12 weeks of UI.

- i. Typically, employers pay UI taxes based on an “experience rating,” so that employers with more claims pay more than those with fewer claims. [At least 16 states](#) have indicated that benefits issued will not be “charged” to the employer’s experience rating—meaning that employers will not be penalized with higher UI tax rates in future years because of pandemic-related layoffs.
 - d. States should adopt work-sharing programs that allow workers facing a potential layoff to share their hours with another employee and supplement their reduced income with UI.
 - i. To create a work-sharing program, states must enact legislation enabling the workshare, usually as a division of the state Unemployment Insurance program. From there, businesses can develop their individual workshare/short-term compensation programs per the guidance outlined in state legislation. States with an existing workshare program will receive a 100 percent federal reimbursement for short-term compensation paid through workshare through December 31, 2020 under the CARES Act. States without a workshare program can get federal reimbursement for 50 percent of their startup costs. Currently, [22 states lack work-sharing programs](#).
- 2. *States should improve immigrants’ access to Unemployment Insurance by clarifying who currently qualifies for UI benefits and under what criteria in each state.*
 - a. Under federal law, immigrants are eligible for Unemployment Insurance benefits if they have valid work authorization for the time they worked, at the time that they apply for benefits and throughout the period during which they receive benefits. However, because states have some say over the criteria under which immigrants are eligible, this eligibility may not be immediately clear. States should clarify under what criteria immigrants are eligible for UI benefits and adopt different criteria, if doing so will extend eligibility.²
- 3. *States could consider reclassifying gig and contract workers as employees to ease their access to UI benefits.*
 - a. While the CARES Act expands UI eligibility, to ensure gig and contract workers’ access to essential UI benefits after the crisis, many states are exploring how to reclassify these workers to make them eligible. [California passed a law](#) making it easier for gig employers to be classified as employees and qualify for UI. [Other states were considering those laws](#) as well earlier in the year.

² For UI eligibility, [most states have adopted an inclusive definition of immigrants who were “lawfully present for purposes of performing services”](#), which includes immigrants with work authorization during the base period, and individuals whose work authorization is inherent to their status (e.g., lawful permanent residents, refugees, asylees, migrants who entered under the Compact of Free Association). This also includes anyone who has a valid work permit, including people who have filed an application for adjustment of status, applicants for asylum*, DACA recipients, TPS recipients, and applications for TPS or for suspension of deportation/cancellation of removal, among others.

Re-employment strategies for dislocated workers include those which help unemployed, underemployed and recently laid-off workers connect to essential services and opportunities to reconnect to employment.

1. *States should consider applying for DWNR funds to respond to large, unexpected layoff events and temporarily expand services to dislocated workers, including job training.*
 - a. The Coronavirus Aid, Relief, and Economic Security (CARES) Act, signed into law March 27, 2020, includes [\\$345 million in new funding for the Dislocated Worker National Reserve \(DWNR\) Funds](#), national grants to support training and career services for workers who have lost their jobs due to COVID-19.
2. *States should examine how they can use previously awarded RSI DWG funding to effectively serve dislocated workers affected by the coronavirus pandemic.*
 - a. The federal Reemployment & Systems Integration (RSI) Dislocated Worker Grants (DWG) are to provide funding to improve the capacity of the workforce system to efficiently link dislocated workers, including those who might first approach the workforce system as unemployment insurance claimants and the long-term unemployed, to the broad spectrum of employment and training assistance available to them and to support their productive reemployment.
 - i. Funds can be used by States to integrate their unemployment insurance, employment services, and WIOA workforce information technology systems to provide a seamless experience for dislocated workers and to assist dislocated workers in accessing services. A full list of awarded state grants from the U.S. Department of Labor Employment and Training Administration [can be found here](#).

Extend training and supports to returning citizens³ and other individuals impacted by the criminal justice system (like the 4.5 million people under community supervision through probation and parole). As coronavirus cases multiply, several states including [New Jersey](#), [Michigan](#), and [Colorado](#) are releasing nonviolent offenders from jails, hoping to avert the mass spread of COVID-19 throughout the incarcerated population. Decarcerating nonviolent offenders, eliminating population-specific restrictions and investing in re-entry programs will extend opportunity to this vulnerable population.

1. *States should suspend or eliminate restrictions on cash, food and nutrition, housing and health, and mental health supports for returning citizens.*
 - a. Returning citizens often need support services to build a stable foundation from which to secure housing, a job or job training and a steady income. Restricting their access to public benefits and supports makes their transition more difficult and can increase recidivism. States should eliminate restrictions on public assistance for formerly incarcerated populations.

³ The term “returning citizens” refers to people with a criminal history or the formerly incarcerated.

2. States should *expand reentry programs for recently decarcerated populations* following COVID-19-related early release, including those reentry programs that focus on skills training and employment.

Selected State Policy Impacts of the Coronavirus Aid, Relief, and Economic Security (CARES)

Fiscal policy

The Coronavirus Aid, Relief, and Economic Security act (CARES) provides an estimated \$2 trillion stimulus package to battle the harmful effects of the COVID-19 pandemic. Selected funds and allotments are included below. For a full list, see this [breakdown from National Conference of State Legislatures](#):

- Creates a \$150 billion coronavirus relief fund for state, local and tribal governments. [See estimated state allocations here](#). Funds can be used for costs that:
 - Are necessary expenditures incurred due to COVID-19.
 - Were not accounted for in the budget most recently approved as of the date of enactment of this section.
 - Were incurred during the period that begins March 1, 2020 and ends Dec. 30, 2020.
- Establishes a \$500 billion lending fund for businesses, cities and states, including \$349 billion for loans to small businesses with 500 or fewer employees and nonprofits of the same size through the Small Business Administration (SBA).
 - loans may equal up to 250 percent of an employer's average monthly payroll and will be forgiven if employer maintains payroll and spends on payroll, mortgage, rent and utility.
 - \$10 billion for emergency grants of up to \$10,000.
 - \$17 billion to cover six months of payments for small businesses with existing loans.

Public assistance

The CARES Act also makes crucial changes to eligibility requirements for essential public benefits like Unemployment Insurance.

- The CARES Act expands Unemployment Insurance extended benefits (meaning states can provide up to 13 additional weeks of UI benefits) and provides temporary unemployment compensation of [\\$600 per week for Federal Pandemic Unemployment Compensation](#), which is in addition to regular state and federal UI benefits. [Part-time, self-employed and gig economy workers now have access to UI benefits](#) and CARES allows employers to receive an advance tax credit from the treasury instead of having to be reimbursed on the back end.

Education

CARES includes \$30 billion for an Education Stabilization Fund for states, school districts and institutions of higher education for costs related to the coronavirus

- Each state will receive a share of \$3 billion for governors to allocate at their discretion for emergency support grants to local educational agencies and institutions of higher education that have been most significantly impacted by the coronavirus. States should use these funds to serve adults (opportunity youth) as much as possible, though funds are targeted to elementary and secondary students and individuals ages 5 to 24.
- CARES includes \$14.5 billion for emergency relief for Institutions of Higher Education to respond to the coronavirus. At least 50 percent of institutional funds must provide emergency financial aid grants to students that can cover eligible expenses under a student's cost of attendance, such as food, housing, course materials, technology, healthcare and childcare. Remaining institutional funds may be used to defray expenses for IHEs, such as lost revenue and technology costs associated with a transition to distance education.
- CARES also allocates \$13.5 billion in formula grants for states to use towards planning and coordination and the transition to distance learning for elementary and secondary education.

Digital literacy

The [Digital Equity Act](#) is federal legislation that calls for state formula grants to promote digital equity and access. The CARES Act included \$50 million in funding for the Digital Equity Act out of the initial \$500 million requested.

Address immediate shortages in industries needed to respond to crisis: Industries like healthcare, logistics, and manufacturing are essential to responding to COVID-19 and are already facing severe shortages of trained workers.

Rapid re-employment strategies can help on-ramp eligible workers into in-demand careers in essential sectors to help with coronavirus response.

1. *States can consider assigning critical job designation and adopting rapid hiring practices to quickly locate, hire and on-board workers into essential positions.*
 - a. WorkSource Seattle-King County launched a “critical jobs” listing for companies needing to ramp up staffing during this crisis. States can issue guidance to replicate rapid hiring efforts (ETR0330)⁴.
 - b. On March 30, Gov. Newsom announced the [California Health Corps](#), a recruitment campaign to bring into service professionals ranging from doctors to emergency medical technicians and certified nursing assistants. All medical professionals with a valid California license (or enrolled as a medical resident or nursing student) with no negative licensure/certification actions are eligible. The governor also issued an executive order directing the states professional licensing agencies to make this happen (ETR0406).
 - c. Hawai’i Gov. Ige and DLIR Director Scott Murakami launched the [Reducing Unemployment Disruption & Driving Economic Regeneration \(RUDDER\)](#) program to align federal workforce programs, such as the Disaster Recovery grants, to efficiently train and transfer workers into essential sectors like healthcare from hardest hit sectors like hospitality.
 - i. RUDDER provides up to \$100,000 of relief to businesses for new employees hired after March 1, 2020. The program provides an initial \$500 payment for each new employee to offset training and associated costs. After six months of continuous employment and confirmation of retention, the DLIR will issue a second payment of \$500.
 - d. Federal regulation has shifted to allow states facing healthcare staffing shortages to use new Medicaid flexibilities to expand staff (provider) qualifications (e.g., where a provider must be 21 years old, states could modify the age requirement to 18); add additional providers (including allowance of payment to family members and legally responsible relatives); add services, such as a live-in care giver; and temporarily adjust rates to [incentivize more individuals to join the workforce](#).

⁴ This parenthetical “ETR0330” notes that the information preceding is sourced from the Employment & Training Reporter. Due to copyright law, this publication cannot be shared externally. References to this biweekly bulletin will follow this format: Employment & Training Reporter (ETR) and Date of Publication (0330, or March 30).

Rapid reskilling and upskilling strategies for priority industries and all workers:

1. *States can consider creating opportunities to launch qualified students into essential healthcare roles by changing licensing and assessment requirements or providing provisional permits and waivers.*
 - a. Several national nursing associations released a joint policy brief in support of [creating sector partnerships and paid internship opportunities for licensed and practical nursing students](#) to simultaneously receive clinical education and assist the nursing workforce during the COVID crisis.
 - b. In Pennsylvania, Gov. Tom Wolf (D) lifted some State Board of Nursing requirements allowing nurses with temporary practice permits and nursing school graduates with graduate permits to stay in practice. Anyone with a permit expiration taking place within 90 days of March 20 received an automatic extension. The state also applied an automatic three-month extension to expiring nursing licenses. Fees for filing for permit extensions were waived (ETR0406).
 - i. Recent nursing school graduates unable to take licensing exams due to cancellations were granted graduate permits which allow student nurses to practice while supervised, meaning working within the physical presence of a registered nurse. New York City implemented a similar permit for student nurses to work under RN supervision (ETR0406).
 - c. In Virginia, new waivers allow nursing school graduates who have been delayed in taking their licensing exams to enter practice and continue beyond a 90-day provisional period. These policy changes allow students who are otherwise on schedule to complete their RN and LPN programs to graduate without having met clinical hours (ETR0406).
 - d. Another Virginia provision lifted the requirement that nursing aide classes be taught by RNs or LPNs who have had additional training for teaching adults. Another waiver lifts a 120-day limit on how long a graduate from a medication assistance program can provisionally practice before passing their state exam (ETR0406).
2. *States can also encourage worker retraining and upskilling at community colleges and lower barriers to enrollment and participation, particularly for dislocated workers.*
 - a. Gov. Mills signed an executive order to fast track [free online job training at Maine's community colleges](#) amid the coronavirus pandemic. Gov. Mills' order suspends certain restrictions, on an as-needed basis, on job training funds managed by the Maine Community College System's Maine Quality Centers (MQC) workforce training program. Suspending those restrictions gives the MQC program more flexibility to rapidly provide free online training to people who have been displaced by the recent effects of COVID-19.

Extend childcare and dependent care for front-line workers and essential employees, like health care workers.

1. *States should consider [establishing child care centers for children of essential employees](#) and front-line workers.*
 - a. Gov. Doug Ducey and the Arizona Department of Education are working with school districts across the state [to launch a child care program for children of first responders](#), critical health-care workers and essential public sector workers, including child-safety workers.
 - b. [Colorado plans to provide emergency child care to eligible workers](#), including nurses, doctors, hospital support personnel, staff at long-term care facilities and other nonmedical emergency personnel. Childcare providers who agree to work during this time would be paid an enhanced rate.
 - c. On March 17, [Ohio announced plans to open “temporary pandemic child care centers”](#) in response to requests from several hospitals
 - d. New York City plans to open approximately 100 Regional Enrichment Centers throughout the city to accommodate the children of essential service providers.
2. *States should also consider expanding on their definition of “essential” workers to include front-line staff, like grocery store workers, if that helps expand access to childcare for those workers.*
 - a. Minnesota and Vermont have classified grocery clerks as emergency personnel, meaning that they qualify for free child care while schools are closed.
 - i. The directive from Minnesota Gov. Tim Walz came as part of an order for [“Care for Children of Families of Emergency Workers,”](#) which instructs closed schools to continue to provide care for children of emergency personnel who are “critical to the response of COVID-19.” Under the order, grocery workers are considered “essential tier 2 workers.” (People caring for the children of emergency personnel are also considered emergency personnel.)
 - ii. The state of Vermont is developing a plan to reimburse private child care centers for providing care to essential workers. The public safety commissioner’s office is in the process of adding grocery store workers to the list of essential employees who would receive services like child care.
3. *States should also consider how to use existing state and federal funding streams to enable continued access to free or low-cost child care for workers.*
 - a. Through executive order, Governor Polis directed the Colorado Department of Human Services (CDHS) to access additional Child Care Development Block Grant funds for counties to reimburse child care providers in the Colorado Child Care Assistance Program (CCCAP) for absences or closures related to COVID-19. Gov.

Polis also signed an [executive order](#) authorizing state agencies to extend the expiration date for child care center and family child care home licenses.

Update education and training policies to respond to marketplace disruption: Update our higher education policies to support the infrastructure and flexibility required for short-term digital learning to get displaced workers retrained quickly.

Digital literacy, access and inclusion efforts are especially important given social distancing requirements which necessitate remote work for nonessential workers and distance learning for students; however, this digital focus disproportionately impacts people and communities with less access to digital tools, devices and digital upskilling.

1. *States looking to extend essential broadband could create a “[Lifeline Broadband](#)” program that extends free broadband internet access to affected or low-income households, based on the federal [Lifeline Program](#) which extends free phone access to low-income households.*
 - a. Since 2016 the Federal Lifeline program has provided subsidized phone and broadband access for low-income Americans. “Lifeline broadband” could be an important digital inclusion tool, but its effectiveness has been limited by recent FCC rule changes as well as funding constraints.
2. *States should consider how to support workers’ digital skill building by considering how to clarify language in existing adult education or higher education grants and contracts to affirm the eligibility of these activities.*
 - a. Digital skill-building and digital literacy trainings are eligible “work preparation activities” under WIOA Title II. Additionally, states should consider investing in blended learning strategies for digital skill building and instruction as well as capacity development at institutions (i.e., training providers, community colleges, colleges and universities) to ensure that dislocated workers and other students can take advantage of new opportunities.

Adult education program term flexibility and continued funding eligibility for current enrollees:

1. *States should take advantage of increased flexibility for adult education grantmaking per new OCTAE guidance.*
 - a. The Department of Labor’s Office of Career, Technical and Adult Education “Adult Education and Family Literacy Act and COVID-19 Frequently Asked Questions” program memo (20-3), released March 27, 2020 notes that states may modify their plans for funding competitions by either:
 - i. Adjusting their timelines for grantmaking and delaying the award of grants or contracts to an unspecified later date; or
 - ii. Suspending their 2020 funding competitions and extend current awards for one full program year. OCTAE grants states the authority to make these

changes but states must ensure that adjusting grant competitions doesn't result in a gap in service delivery.

- b. New OCTAE guidance gives states the authority to allow currently funded adult education grantees to provide distance learning, even if the state does not have a distance learning policy in place. States are encouraged to put these policies in place as soon as it is feasible to do so. Policies should address the monitoring of instructional hours as well as student assessment.
2. *States should put procedures in place in their reporting systems to identify students who could not be assessed due to COVID-19 disruptions.*
 - a. Many individuals enrolled in adult education courses will struggle to complete their coursework due to testing location closures and a lack of robust remote assessment infrastructure. If possible, states can pursue virtual test proctoring, though states are encouraged to consider other methods of recording measurable skill gains, such as credit completion or high school completion.
 - i. California's Adult Education program is allowing state-funded adult ed programs to test students remotely (that is, not making them come in person for end-of-semester tests) and *still be in compliance with their grants/contracts*. The Department of Education is cautiously deferring to states on whether they would like to attempt remote assessment; other states could follow CA's lead with their state dollars.