Academic Continuity Q&A
Fall 2020[1]
Updated October 13, 2020

For assistance with academic program matters, please contact your campus program review liaison or Associate Provost David Cantaffa at: david.cantaffa@suny.edu.

---

[1] The spring 2020 version is available here.

Remote and Online Learning

1. What resources are available to support highly effective remote and online learning?

SUNY has established a website that contains extensive resources for remote and online learning: https://online.suny.edu/covid19/. This contains a wide range of resources and supports for students, faculty and staff, and campus leaders.

2. Is approval required to offer programs via distance education?

Stemming from actions of the United States Department of Education (USDE), Middle States Commission on Higher Education (MSCHE), and New York State Education Department (NYSED), all SUNY institutions have approval to offer programs via distance education through December 31, 2020.

NYSED has extended distance education flexibility through spring 2021, which permits institutions to continue to offer distance education courses in programs without triggering the need to register the programs in the distance education format, even if the 50% threshold will be reached. NYSED has indicated that this flexibility is scheduled to end at the end of the Spring 2021 semester; therefore, they advise institutions to begin to do a thorough review of each program now to determine the appropriate delivery mode(s) for each program. Institutions should then request the addition of the distance education format to those programs that, beginning after the Spring 2021 semester, will be able to be completed 50% or more through distance education. NYSED is finalizing an expedited application to add the distance education format to registered programs and programs should wait to submit proposals until after this expedited application is released.

This extension from NYSED is an essential action for New York State institutions; however, it is important to note that USDE has not acted to extend its distance education flexibility beyond December 31, 2020 at this time (as of October 13, 2020). This matters in relation to accreditation, because USDE sets the policy frame for accreditors.

The below information is regarding institutional accreditation through MSCHE. Please note that programmatic accreditors may have requirements related to distance education and impacted programs should consult with applicable programmatic accreditors to ensure compliance with programmatic accreditation requirements.

If USDE does not extend federal-level flexibility for distance education:

- For an institution *with distance education as an alternate delivery method in its scope of accreditation*:

  o If the institution *has no non-compliance actions* in the last three years, for each program that adds the distance education format to its registration on or after July 1, 2020 and for each program that will temporarily exceed the 50% threshold of being offered via distance education due to scheduling adjustments related to the COVID-19 public health emergency, the institution must submit notification to MSCHE via the portal (https://msche.force.com/ip) within 30 days of this change (a notification must be

submitted individually for each program and this consists of providing the program title, credential level, and a brief description; there is a cost of $200 per program, though this fee has been waived through June 30, 2021)

- o   If the institution *has any non-compliance actions (warning, probation, or show cause—issued or continued) in the last 3 years*, for each program that adds the distance education format to its registration on or after July 1, 2020 and for each program that will temporarily exceed the 50% threshold of being offered via distance education due to scheduling adjustments related to the COVID-19 public health emergency, the institution must obtain prior approval from MSCHE before implementation of the program via submission of a [substantive change request form](#) at least three months prior to the intended change (an application must be submitted individually for each program and there is a cost of $200 per program, though this fee has been waived through June 30, 2021)

- For an institution *without distance education as an alternate delivery method in its scope of accreditation*:

  - o   To offer programs via distance education (i.e., 50% or more of a program offered via distance education) after December 31, 2020, even if just temporarily due to scheduling adjustments related to the COVID-19 public health emergency, prior to November 1, 2020 the institution must submit to MSCHE its first distance education program under the [Substantive Change Policy and Procedures](#) via the No. 4 Type of Substantive Change: Alternative Delivery Method. Once approved via this process, distance education is considered included as an alternate delivery method within the institution's scope of accreditation.

  - o   For subsequent programs offered via distance education, follow the process described above: "For an institution with distance education as an alternate delivery method in its scope of accreditation"

Even if USDE does extend federal-level flexibility for distance education, please note that for each program that adds the distance education format to its registration on or after July 1, 2020, the institution must submit [notification](#) to MSCHE or obtain prior approval from MSCHE (depending on non-compliance status). This requirement for programs registered in the distance education format is independent of the COVID-19 public health emergency and instead stems from federal regulation changes adopted in November 2019 that went into effect on July 1, 2020.

In calculating the 50% threshold for distance education, campuses would not count courses that began in-person and then transitioned to a remote or online format, because these would be considered hybrid and hybrid courses do not count as distance education for the purpose of determining whether a program exceeds the 50% threshold. All courses offered fully remote or online would count toward the 50% threshold, including courses just temporarily offered via this mode due to scheduling adjustments related to the COVID-19 public health emergency.

For programs with programmatic accreditation, please consult with the accreditor regarding approval requirements. This varies across accreditors.

3. **What does "Regular and Substantive Interaction" mean for remote and online learning?**

Faculty must communicate with students through one of several types of technology—either individually or collectively—on a regular basis. An instructor could use email to provide instructional materials to students enrolled in their class, use chat features to communicate with students, set up conference calls to facilitate group conversations, engage in email exchanges or require students to submit work electronically that the instructor will evaluate. In those instances where a student lives in an area with limited internet connectivity, campuses may consider teleconferencing via land-line phone augmented with communication via surface mail. Federal level definitions of regular and substantive interaction are as follows:

- Regular Interaction: The institution provides the opportunity for substantive interactions with the student on a predictable and regular basis commensurate with the length of time and the amount of content in the course or competency, monitors the student's academic engagement and success, and ensures that the instructor(s) are responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.

- Substantive Interaction: Engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following:
  o Providing direct instruction;
  o Assessing or providing feedback on a student's coursework;
  o Providing information or responding to questions about the content of a course or competency;
  o Facilitating a group discussion regarding the content of a course or competency; or
  o Other instructional activities approved by the institution's or program's accrediting agency.

4. **What general guidance and resources are available to support the learning of students with disabilities?[2]**

The Americans with Disabilities Act, Section 504, and the NYS Human Rights Law continue to apply during the public health emergency. Our responsibilities to provide individual academic adjustments or modifications remain unchanged. Nazely Kurkjian, System Coordinator of Disability, Diversity, and Nontraditional Student Services has worked in cooperation with the Office of General Counsel, to prepare the following guidance and resources.

- Institutions may see an increase in accommodation requests overall, particularly chronic health and mental health disability accommodation requests. People with serious chronic health

---

[2] Derived from March 18, 2020 memorandum from SUNY Provost to campus Chief Academic Officers; updated September 28, 2020 by the Coordinator of Disability, Diversity, and Nontraditional Student Services

conditions are at a higher risk of getting sick from COVID-19. Maximum flexibility for campus community members with immunocompromised disabilities students is strongly encouraged.

- Students who utilize assistive technologies (e.g., text-to-speech software) may only have access to these technologies at the physical campus. Therefore, campuses need to consider how those students can use such assistive technology remotely. There may be alternative software or other technologies available on the student's home device to provide equivalent access, but this will require dedicated conversations to assess.
- Transitioning to online or other forms of remote instruction may change the accommodation plans for students with disabilities. Some accommodations faculty used before may no longer apply, and some accommodations not considered previously may need to be considered now.

While students are not required to disclose their disability to the institution, students should be provided contact information for the campus accessibility/disability services office and offered the opportunity to update their accommodation plan as needed. To that end, students may have difficulty obtaining documentation from secondary institutions and/or medical providers at this time. As such, campuses are encouraged create mechanisms to permit students to receive accommodations when documentation of the disability is not readily available. Offices should also permit students to send pictures of their documentation. Ultimately, these offices can conduct the interactive process with students through teleconferencing solutions.

In exploring different types of distance/remote technologies, faculty should consider the following.

Teleconferencing/Lecture Capture Technologies: Not all teleconferencing software is fully accessible to individuals with disabilities. To make sure students can engage in the online learning environment:

- Identify the accessibility barriers for the product and limit interactions of inaccessible features;
- Provide accessibility features and resources to enable using the product independently;
- Be prepared to provide live or closed captioning upon request. Consider using built-in accessibility features, such as Microsoft Office PowerPoint with the Presentation Translator Plug-in, or Google Slides with live captions; and
- As screen sharing occurs, audio description is needed to provide the important visual content to people who are blind or visually impaired.

Additional third party or open-source digital learning technologies used to facilitate instruction, such as polling software, must also be evaluated for accessibility. If the required technology is inaccessible to users with disabilities, faculty should work closely with the campus accessibility/disability services office to create equally effective access for the known barriers.

Digital Content: As various types of content are uploaded to the Learning Management Systems (LMS), faculty should establish a plan to prioritize making course materials and related technologies accessible to all learners. It is recommended to use the following hierarchy:
- Content for registered students with disabilities;
- Large enrollment courses; and
- Required courses.

There are numerous free or campus-sponsored tools to enhance the inclusiveness of the course. Here are some basic universal design tips:

- When posting a PDF, make sure it is searchable text and not just an image;
- When posting a PowerPoint presentation, use larger size fonts and high-contrast color schemes. Avoid the use of color or animation to convey information;
- When posting a video, check and see if it has intelligible captions. At minimum, use automatic caption features (e.g., YouTube) and improve accuracy as needed;
- When posting audio, also share a written transcript. The Google Docs Voice Typing feature creates a transcript for users;
- When posting photographs, graphs or other media, add alternative text to describe the image and its context;
- For a campus that uses accessibility tools in its LMS, leverage them; and
- When using a new technology for engagement/discussion, check with the campus accessibility/disability services office to be sure all students can use it.

Online Exams/Quizzes: For courses moved online, the process for scheduling and delivering exams and quizzes may change. As campuses plan to deliver exams online, ensure that assistive technologies (e.g., screen reader, text-to-speech) are not blocked from taking exams remotely. While proctoring/testing systems allow for exam security, they may pose barriers to students with disabilities. To extend time on exams and quizzes, most, if not all, LMS have built-in features to accomplish this. However, there may be a need to extend the time manually for the individual student for each exam and quiz.

Additional Resources:

- Ally software is an accessibility tool for courses that provides faculty with user-friendly feedback on the accessibility of their content.
- SUNY's Electronic & Information Technology (EIT) Accessibility webpage in SUNY Blue offers extensive guidance and webinars to support accessible online environments. Visit blue.suny.edu and enter your campus credentials. Navigate to Enterprise Projects > SUNY EIT Accessibility.
- Deque University: Unlimited user access to self-paced online accessibility training. Beginner, intermediate and advanced courses to support web developers, faculty, and administrative staff. Contact your campus Deque University administrator or EIT Accessibility Officer.
- Check out 20 Tips for Teaching an Accessible Online Course.
- For individuals who have a chronic illness, please feel free to share this resource to speak with others who understand this time of heightened stress: Beyond My Battle Support Group.

Supplementary Guidance:[3]

This information expands on an earlier communication sent in March (provided above) and offers considerations for students taking classes in person and online. The best practices shared below and in the attached were informed by experiences from the transition to remote delivery during the spring semester and summer sessions, campus reopening plans for fall, and ongoing conversations with the accessibility/disability services professionals across SUNY.

---

[3] Derived from August 25, 2020 memo from SUNY Provost to campus Chief Academic Officers, Campus Disability Services Officers, Campus Electronic and Information Technology Officers

The strongest results have come from faculty who are able to utilize universal design for learning concepts and proactively address the accessibility of electronic course materials. Some faculty have shared their experience and expertise in this area in the form of webinars for SUNY's [Remote Teaching Playlist](#) and the [Accessibility Week Playlist.](#) Additional resources on digital content accessibility are also available in [SUNY Blue](#).

With universal design in place, students should generally be expected to attend and participate in class, and to observe deadlines for submission of assignments; however, there may be a need for some exceptions. We urge both understanding and flexibility, as some students will continue to struggle with their changed environment. A few best practices in this regard:

- Encourage use of [free or low-cost assistive technologies](#) to aid students in meeting expectations.
- Record lectures and make them available for later review. This reduces the need for notetakers, and benefits students who experience difficulties accessing technology or the Internet at specific times. Students may be juggling family or work obligations or have back-to-back classes—some of which may have in-person components and others are largely virtual. Those students may need time to travel back and forth from the campus to their residence (or a place with stable Internet access).
- To the extent possible, facilitate remote exams. The offices that typically offer proctoring exams as a service to faculty may not be able to accommodate all students with disabilities due to necessary social distancing measures and staffing capacity. In some instances, it may be appropriate for the student to take the exam in-person or proctored remotely if they require unique accommodations or use assistive technologies that are incompatible with exam security software.

Campuses may experience an increase in disability-related requests for assistance animals (i.e., emotional support animals), accommodations related to wearing face coverings, and the option to take a course remotely. It is important to provide individualized considerations for these requests. Following the guidance from the Office of Civil Rights, campuses "must ensure that students with disabilities have an equal opportunity to access educational programs, consistent with protecting the health and safety of the student and those providing that education to the student" ([Questions and Answers for Postsecondary Institutions Regarding the COVID-19 National Emergency (United States Department of Education Office for Civil Rights)](#)).

- Personal Care Attendants/Aides and Sign Language Interpreters

  Personal care attendants, aides, and other service providers (e.g., Sign Language Interpreters) should be subjected to the same processes as students and employees related to COVID screenings, temperature checks, wearing masks and so forth.

- Face Coverings

  Face coverings, such as cloth masks, are generally required to maintain the health and safety of the campus community. However, the CDC recognizes there are instances where this may not be possible for all people ([Considerations for Wearing Masks (CDC)](#)). Requests for exemptions or modifications to the face covering policies should be treated like any other accommodation

request. For this determination, a direct threat analysis is most appropriate ([The ADA and Face Mask Policies (Southeast ADA Center)](#)).

If such an accommodation is granted, it is suggested that the student carries a letter or memo on them at all times. If the request is denied, document the basis for the decision.
If a student is having difficulty understanding professors, professionals, or peers wearing masks, there are numerous options to explore: texting apps, use of microphones, record and caption lectures, offer a notetaker or notetaking software, provide an assistive listening device, or alternate communication solutions such as live captioning.

- Requests for Online Classes

Students with concerns about attending in-person instruction due to a high-risk medical condition identified by the CDC, or who live with someone in a high-risk category, may request to take a course online. Campuses should explore all options to participate in the class remotely, including identifying course offerings offered by another SUNY institutions and/or appropriate course substitutions. This said, it may not be possible to replicate all courses in an online format.

If there is an anticipation that the number of registrants will exceed available seats for a given course, consider providing priority registration, to enable students to register for the online section of the course in a future semester. If the course is full, consider increasing the class size or offering another section.

- Placement Exams Considerations

Campuses should strive to create universally designed test placement environments. To the greatest extent possible, all students should be able to take placement exams remotely. Students with disabilities should not be advised to wait until campuses reopen to take placement exams. In exceptional circumstances, if any student must wait until campuses reopen to take placement exams, it is advised they be allowed to apply for an exception and reviewed on standardized tests to register for courses.

When students are provided instructions to register for placement exams, include the following questions:
  o What kind of technology devices do you have at home?
  o If you have a computer (desktop or laptop), do you have a working webcam and microphone?
  o Do you require accommodations due to a disability (e.g., extended time)?
  o What kind of accommodations have you received in the past?

Prior to administering the exam, ensure that accessibility supports are available. Minimally, incorporate accommodations within the testing environment for the most frequent types of accommodations:

  o Time Considerations: Allow for an open time frame, to the extent it is practical and reasonable. Avoid setting time limits which will discourage comprehensive review of the exam content.

Page **8** of **19**

- o Alternative Formatting
  - Reading: Students vary in their experience with assistive technology. If the student is not familiar with Assistive Technology, a short training session may be necessary before the student begins the exam. Text-to-speech software may be appropriate, if it is compatible with the testing platform. If the exam is housed on a lock-down browser, an effective screen reading technology may be necessary. The test proctor should work closely with the student to ensure that the technology is accessible to the student and is an effective accommodation. If the technology creates a barrier, it may be necessary for the test to be read by a human reader. In the interest of creating independent learning environments, the use of technology is encouraged.
  - Writing: Students with written expression disabilities (e.g., dyslexia) may be entitled to access to Word processing software or speech-to-text software to eliminate barriers. Some students may need additional supports, such as the utilization of a scribe.
  - Proctoring: Exam security platforms may pose barriers to students with devices that are incompatible with the proctoring platform, assistive technology, or the individualized accommodation necessary to provide equal access. Proctoring software should be evaluated for accessibility and interoperability with assistive technology prior to implementation. If this is not possible, work closely with the Disability Services Office to provide an equitable alternative in a timely manner.

5. What are some solutions for lip and speech reading during the Covid-19 pandemic?[4]

There may be individuals who rely on lip/speech reading during classroom instruction. With the requirement of wearing face coverings to reduce the probability of viral transmission during the COVID-19 pandemic, alternative solutions that make communication as equally effective for these individuals as for those without disabilities are required (https://www.ada.gov/effective-comm.htm).

SUNY System Administration's primary recommended solution is to use captioning technologies, the details of which are provided below. Other alternatives that may be beneficial for deaf and hard of hearing individuals are also presented. These solutions can be used in addition to captioning. Campuses should also provide information on how to register with the campus accessibility/disability services office to students who rely on lip/speech reading to receive appropriate services.

Captioning Technology

The use of captioning technology may offer an effective alternative when safety constraints related to the COVID-19 pandemic are not conducive for lip/speech reading to occur. Captioning is a process in which speech or audio accompanying a video is converted into text, which is displayed in a synchronous manner, typically at the bottom of the video screen.

---

[4] Derived from August 24, 2020 memorandum from SUNY Provost to campus Chief Academic Officers

Lectures and presentations can either be projected in the classroom or played on a personal digital device with streamed captioning in real time. Pre-recorded video content may also be asynchronously provided with captions (https://www.nationaldeafcenter.org/covid19faqs#speech-to-text).

In these cases, typically, live captioning services are used to generate the captions. Also referred to as real-time captioning or computer-assisted real-time transcription (CART), live captioning involves a captionist (a qualified speech-to-text professional) who delivers captions of what is being said in class through a platform over the internet. The words are projected onto a user's screen. Live captioning can be provided on-site or remotely and is a reliable and effective means of communication.

While most live-conferencing and video-streaming platforms such as Zoom, Microsoft Teams, and Google Hangouts may have automated-captioning capabilities (utilizing Automatic Speech Recognition (ASR) technology) that can assist in communication with individuals who need lip/speech reading, these built-in features can produce inaccurate or unintelligible textual and grammatical information. Automated captions may be acceptable for some individuals, but they are not as effective as live captioning solutions and may not serve as an effective communication alternative for all individuals who rely on captions.

SUNY System Administration does not endorse any particular provider of live captioning services; however, for ease of reference two potential suppliers of live captioning solutions are listed below:

- https://www.captioningstar.com/
- https://streamtext.net/

Although it may be expensive, faculty and staff should be prepared to explore the use of live captioning services as an alternative accommodation. Faculty are encouraged to consult with their campus educational technologists and student disability services professionals for assistance and support in this area.

Other Communication Solutions

The following communication solutions can be used to complement captioning technologies:

- Text Interpreting (Typewell or C-Print)
- Video Remote Interpreting
- Assistive Listening Systems

Text Interpreting, also referred to as meaning-for-meaning voice-to-text service, is specifically designed for the educational setting, wherein a text interpreter converts spoken communication and environmental sounds into clear, visually accessible text using condensing strategies to restructure spoken information into a grammatically correct format. Meaning-for-meaning focuses on the intent of the communication, rather than every word or syllable, and further utilizes visual formatting to represent auditory elements such as tone of voice, repetition, and emphatic pauses. For your reference, Typewell and C-Print are two main text interpreting systems in use today.

Video Remote Interpreting services utilize remote interpreters who with the use of a computer, webcam, real-time video communication software such as Skype and headset provide real-time interpreting services through a high-speed internet connection.

While SUNY System Administration does not endorse any particular company, ACS (https://www.acscaptions.com) is one potential supplier of text interpreting and video remote interpreting services.

Assisted Listening Systems are personal and/or room-based communication devices that assist in broadcasting and amplifying audio sources. These devices broadcast audio signals to various types of receivers, used primarily by individuals with hearing impairments. Receivers can be full headsets, single-ear pieces, or telecoil necklaces (that broadcast the room signal to the wearer's hearing aid).

Clear Face Shields

After careful investigation of the advantages, potential protective features, and practicality of utilizing clear face shields, both with and without a fabric drape around the face for added protection, it is evident that clear face shields *alone* provide inadequate protection to the wearers and others (W.G. Lindsley, J.D. Noti, F.M. Blachere, J.V. Szalajda, and D.H. Beezhold, Efficacy of Face Shields Against Cough Aerosol Droplets from a Cough Simulator, *Journal of Occupational and Environmental Hygiene*, 11: 509–51). Furthermore, clear face shields with a fabric drape that provide adequate filtering of aerosolized particles do not appear to be commercially available at this time.

In addition, other commercially-available products such as transparent face masks and surgical masks with window, do not generally meet the requirements for safe and effective lip/speech reading in a classroom setting.

Disclaimer: The scientific understanding of COVID-19 and the virus transmission evolves rapidly. The recommendations in this document are based on current understanding and may need to be updated as research advances. The information contained in this document is intended for SUNY campuses and may not be used, published or redistributed without the prior written consent of SUNY. The opinions expressed and information enclosed are made in good faith and while every care has been taken in preparing this document, SUNY, its employees and affiliates cannot be held responsible for the use of and reliance of the opinions, estimates, forecasts and findings in this document.

6. What are some resources for inclusive remote learning?

Below are links to best practices for inclusive instruction that address accessibility concerns as well as issues of micro-aggressions in the classroom.

- This link is to instructional resources from San Diego University presented in a NADOHE (National Association of Diversity Officers in Higher Education) webinar focused on maintaining equity in a virtual classroom. https://diversity.sdsu.edu/resources/inclusive-pedagogy
- This link is to a website maintained by the Rossier School of Education at the University of Southern California that focuses on tools and strategies for inclusive teaching. It is organized around different facets of diversity—gender, sexual orientation, race, social class, disabilities, etc.—and includes web resources and scholarly articles from a variety of leading institutions. https://rossier.usc.edu/tools-for-inclusive-teaching/
- This link from Appalachian State University offers insight into "humanizing" on-line instruction. https://cae.appstate.edu/inclusive-excellence/inclusive-online-teaching

- This blog from Rice University's Center for Teaching Excellence offers tips on how to create a more inclusive learning environment while teaching remotely. https://cte.rice.edu/blogarchive/2020/3/13/inclusion-equity-and-access-while-teaching-remotely
- This website for general audiences focuses on identifying and responding to bias incidents and offers 10 tips for identifying bias and 7 tips for responding to bias. https://www.tolerance.org/professional-development/identifying-and-responding-to-bias-incidents

Course Credits

7. What are the credit hour requirements for courses?

50.1(o) of the Commissioner's Regulations defines a credit (a.k.a. semester hour) as follows: a credit, point, or other unit granted for the satisfactory completion of a course which requires at least 15 hours (of 50 minutes each) of instruction and at least 30 hours of supplementary assignments.

For courses offered in a remote or online format, the total expected learning time remains the same (45 hours per credit hour), but the breakdown between instruction and supplementary assignments can vary. When calculating time, faculty should consider the time it would take for students to engage in the following: interacting with course presentations/lectures; reading other materials; participation in online discussions; doing research; writing papers or other assignments; and completing all other assignments (e.g., projects).

8. What is the limit to the number of credit hours for which students can register during short sessions, such as the winter session?

The SUNY policy on Credit/Contact Hour establishes expectations regarding the number of contact hours per credit hour. This is consistent with NYSED definition of credit hour described above. In this policy, short sessions are addressed as follows: Credit hours may be earned in short sessions (summer sessions, intersessions, etc.) proportionately to those earned for the same activity during a regular term of the institution, normally at no more than one credit per week of full-time study.

The one credit per week limit is derived from the instructional and supplementary assignment hours expected per credit hour. One (1) credit hour equals the equivalent of 15 instructional hours and 30 supplementary assignment hours. Therefore, 1 credit hour per week would equate with the equivalent of 45 hours of work per week. Much more than 1 credit hour per week would present a logistical challenge. But, for example, if a campus can ensure that a student registered for 1.5 credit hours per week is able to complete the equivalent of 67.5 hours of work per week, that would be possible. Though, campuses should be quite careful about this and it would be inadvisable to consider anything more than 1.5 credit hours per week. Additionally, campuses should engage their financial aid officer to determine financial aid considerations.

Course Grading

9. What guidance is there for Pass/Fail (or equivalent) course grading?[5]

In spring 2020, campuses were informed that they have the flexibility to extend their policies so that students may opt—with appropriate advisement—to have spring 2020 courses graded Pass/Fail. There was no SUNY, NYSED, or Middle States approval needed to enact such flexibilities on an ad hoc basis according to programmatic needs; instead, this was a campus-based decision.

If considering shifting all spring 2020 course grading to Pass/Fail, campuses were advised to consult with all applicable programmatic accreditors, as well as review all licensing/certification requirements for licensure/certification-qualifying programs.

And, campuses were advised against adopting an across-the-board Pass/Fail grading scheme unless absolutely necessary, because there are multiple considerations that could render such a process problematic, including the following:

- A student may need GPA-impacting course grades in order to meet the institutional GPA requirement for graduation;
- A student may need GPA-impacting course grades in order to demonstrate satisfactory academic progress;
- A student may want GPA-impacting course grades in order to be competitive for graduate school admissions (and other purposes external to the program);
- Programmatic accreditors may have requirements regarding the maximum percentage of courses that may be graded Pass/Fail and/or the particular kinds of courses that may be graded Pass/Fail;
- Licensure/certification-qualifying programs may be impacted by licensing/certification requirements; and

There are transfer considerations related to course grading and students need to be advised of the impact of Pass/Fail grades on both intra-SUNY transfer and transfer to non-SUNY institutions.

- Within SUNY, campuses should consider the following when evaluating Pass/Fail grades for course transfer credit:
  - A guiding principle cited in SUNY's transfer policies is equity between native and transfer students, such that SUNY transfer students and native students are treated the same for academic purposes (see MTP Vol. 11., No. 1, Salient Provisions I.1.).
  - Due to the extraordinary circumstances surrounding SUNY's response to the COVID-19 pandemic, when evaluating general education course credit earned during the spring 2020 term by incoming transfer students, transfer of credit is guaranteed at all SUNY campuses if a SUNY general education course is successfully completed with any passing grade, including a 'P' in a Pass/Fail grading system. *Please note, there has been no further guidance regarding course credit earned beyond the spring 2020 term.*
  - Consistent with prior policy, a passing grade counts as successful completion for the SUNY-GER area at any campus. Each campus has discretion about whether a particular course grade satisfies graduation requirements outside SUNY-GER, provided that the campus treats native and transfer students the same (see MTP Vol. 13., No. 3, III.B.i).

---

[5] Derived from April 7, 2020 memorandum from SUNY Provost to campus Chief Academic Officers

- o For all other courses outside of the general education requirement, campuses must apply the same flexibilities in their local grading policies to transfer students as they do for native students for the same period of time. For example, if native students are allowed Pass/Fail grading in certain courses for the spring 2020 term, transfer students should also be granted credit for Pass/Fail grades earned in equivalent courses for the spring 2020 term.
  - o Campuses may consider providing additional flexibility in terms of the timing of Pass/Fail grading and withdrawal date decisions, to allow time to consider carefully—in consultation with academic and financial aid advisors, as needed— the potential impact of these decisions. If withdrawal dates are moved to later in the semester, this could have financial aid implications, so students should be encouraged to first consult with their financial aid advisor before pursuing this option.
  - o Consistent with accreditation requirements, campuses must publish and communicate broadly any updates to their grading policies and include specific provisions for both native and transfer students to inform timely advising decisions for currently enrolled and prospective students. As a best practice, campuses should document all decisions related to academic policies, both in general and in specific ad hoc cases.

- For transfer to non-SUNY institutions, students should be advised to consult their intended receiving campus to understand how Pass/Fail courses would be received in transfer. SUNY policies do not apply to non-SUNY institutions, and therefore academic advising in consultation with the receiving campus should inform the decision to pursue Pass/Fail options.

10. Are there guidelines regarding course extensions and/or assigning a grade of incomplete?

There is no SUNY-wide policy regarding this; instead, this is a campus-based decision. For the duration of this public health emergency, campuses are encouraged to be flexible where appropriate. NYSED has issued guidance that indicates the following: Institutions may consider exceptions to their published policies on granting course extensions/incompletes and extend the deadline for incompletes to be resolved, but should be mindful of possible impact on student financial aid eligibility.

Degree Conferral

11. Can a campus be flexible with its degree award dates to accommodate for extended time to complete program requirements (such as clinical practice experiences) so that students are not required to wait until the next planned award date?

Yes, flexibility exists within SUNY and NYSED policy to implement a range of possibilities based on campus processes and individual student needs. The following are examples of possibilities that a campus may adopt:

- For students who meet their degree requirements with coursework in the spring 2020 semester, but have outstanding items such as incompletes, late grades, or late transfer credit submissions, a campus can use an effective date that represents the date the degree was awarded, but apply

the spring 2020 conferral date (e.g., the conferral date of June 1, 2020 can be applied even if the date the campus awards the degree is after June 1, 2020). In other words, a campus may award a degree with a retroactive conferral date, as long as there have been no additional registrations or impactful changes to the student record.

- For students who need to meet their degree requirements with summer coursework, a campus may use the summer 2020 conferral date (e.g., September 1, 2020). If a student needs proof of the award prior to that date, a campus may indicate that a degree is "Approved" on the transcript without yet officially conferring the degree.
- A campus may temporarily establish additional conferral dates (e.g., monthly), so that students do not have to wait until the conclusion of a subsequent term.

Academic Calendar

12. What is the process for making adjustments to the academic calendar?

NYSED approved a regulation [amendment](#) to permit NYS colleges and universities to shorten the fall 2020 and spring 2021 semesters from a minimum of 15 weeks to no less than 12 weeks without impacting a student's eligibility for New York State financial aid. Please note, regardless of the number of weeks in the semester, colleges must still meet the semester hour requirement in Section 50.1(o) of the Regulations which requires at least 15 hours of instruction and at least 30 hours of supplementary assignments per semester hour/credit granted. There is no need to seek NYSED approval for calendar adjustments that meet the above-stated requirements.

For federal student aid purposes, through the end of the academic year that includes December 31, 2020 or the end date for the COVID-19 Federally declared emergency, whichever occurs later, the US Department of Education issued [guidance](#) permitting standard terms to overlap with an adjacent term without the program being considered non-term. Additionally, a standard semester may consist of as few as 13 weeks of instructional time without the program being considered a non-standard term program. It should be noted that any reduction in a program's defined academic year to less than 30 weeks of instructional time must be specifically approved by the School Participation Division (SPD). Submit your request by email to CaseTeams@ed.gov.

Clinical, Laboratory, Studio, Field-Based, and Applied Learning

13. Is there guidance regarding educator preparation programs as related to clinical experience requirements?

For educator preparation programs, NYSED is permitting clinical experiences flexibilities throughout the 2020-21. The specific flexibilities vary by candidate/program type. For full details, please refer to the applicable section of the *[Guidance for New York State Colleges and Universities on Reopening for the 2020-21 Academic Year](#)*. Plans for alternate educator preparation program clinical experiences must be sent to NYSED at: OCUEedapps@nysed.gov and SUNY at: program.reveiw@suny.edu.

Please consult with the applicable programmatic accreditor regarding any additional requirements.

14. **Is there guidance regarding licensure-qualifying programs as related to clinical experience requirements?**

For licensure-qualifying programs, NYSED has issued guidance for the fall 2020 semester that indicates after exhausting all possibilities for candidates to complete on-site clinical experiences, programs could consider the following options: suspending clinical placements and offering an extension for students to complete the clinical courses; reducing clinical hours (for programs exceeding the minimum number of clinical hours required by Education Law, Commissioner's Regulations, and/or national standards); or, using acceptable alternative methods. The specific flexibilities vary by program type. For full details, please refer to the applicable section of the *Guidance for New York State Colleges and Universities on Reopening for the 2020-21 Academic Year*. To obtain approval for an alternative model, institutions must submit an application to NYSED at: opprogs@nysed.gov and SUNY at: program.reveiw@suny.edu (the application is available here). NYSED must review and approve this model before it can be implemented.

For campuses that received approval for the spring and/or summer 2020, but are planning alternate clinical experience for the fall 2020 semester, an updated application must be submitted to and approved by NYSED.

NYSED is working to approve or respond with questions within 48 hours. If a response is not received in this timeframe or if the response is a denial, please contact your campus program review liaison and Associate Provost David Cantaffa (david.cantaffa@suny.edu).

Please consult with the applicable programmatic accreditor regarding any additional requirements.

15. **Is there guidance about how to handle course and/or program requirements that include laboratory, studio, field-based, and/or applied learning experiences?**

For facility-dependent laboratory and studio courses as well as courses with field-based and applied learning experiences external to the classroom that are part of a registered program or are graduation requirements, but not explicitly required by NYSED regulation, an institution may make pedagogically appropriate modifications. As applicable, consideration must be given to the framework of professional association guidelines that establish expectations for curricular components at a particular award level.

Concurrent Enrollment

16. **What are the expectations regarding Concurrent Enrollment courses?**

The SUNY policy on Credit Courses in High Schools establishes general expectations for concurrent enrollment courses (i.e., college courses taught in the high schools by either high school or college faculty). Within the Academic Good Practice section of this policy, there are two parts related to the current public health emergency that are especially relevant to highlight: 1. The appointing institution has a commitment to support the professional development of the high school instructor and 2. Assessment of student learning in the course is comparable to that in its campus counterpart.

- Regarding the first, the campus should be in regular communication with its instructors of concurrent enrollment courses. It is the responsibility of the campus to assist these instructors

in meeting the expectations of the course. For example, remote learning resources that have made available to campus-based faculty should be extended, as appropriate, to concurrent enrollment course instructors.

- Regarding the second, the concept of comparability is expected to be maintained. Related sub-questions are as follows:

    o Q: What course grading options may be applied to concurrent enrollment courses?
    A: The options for concurrent enrollment courses are expected to be comparable to the campus counterpart. For example, if the campus counterpart allows for students to opt for Pass/Fail grading, the same would be applied to the concurrent enrollment course. However, if the campus counterpart is not allowing for students to opt for Pass/Fail grading, the concurrent enrollment course would likewise not be graded Pass/Fail.

    o Q: Must a concurrent enrollment course be completed in full to award college credit?
    A: College credit cannot be granted for a course that is not completed. The campus must be in communication with their high school partners to develop plans for completion such that there is an opportunity for all intended student learning outcomes to be addressed and assessed.

Assessment

17. What are the expectations regarding assessment?[6]

The SUNY policy and procedures on Assessment establish expectations regarding assessment. For the duration of this emergency, SUNY has developed the following guidance regarding continuity of assessment, which is aligned with standards of the Middle States Commission on Higher Education (for programs with programmatic accreditation, please consult with the applicable accreditor regarding program-specific expectations).

The leading principle of this guidance is the expectation that institutions maintain a culture of assessment. A supporting principle is that rather than conceiving of assessment as an all-or-nothing proposition, institutions may adopt modified assessment practices.

- Although it may seem expedient to suspend all assessment practices during this emergency, such a course of action is inadvisable. A culture of assessment is foundational to ensuring quality and continuous improvement and remains so even during times of significant challenge.
- Notwithstanding the first point, full implementation of standardized, complex, and comprehensive assessment practices may not be practicable at this time due to the extent of the efforts necessary to ensure academic continuity.
- In the current context, each institution must review its assessment practices to determine which are most essential and which could be temporarily adjusted or suspended. This type of review is an expectation of the broader accreditation process and is part of the Standard V criteria.
- For the duration of this emergency, an intentionally and strategically focused approach with streamlined practices may be the most effective way to maintain a culture of assessment

---

[6] Derived from April 13, 2020 memorandum from SUNY Provost to Chief Academic Officers

without overburdening the campus community. Shared governance involvement in this process is crucial to effective decisions about which practices are most essential and which could be temporarily adjusted or suspended. There should be clear direction from campus leadership in this effort.

- All decisions about assessment practices for the duration of this emergency ought to be documented with accompanying rationale that supports these decisions, as well as the timeframe(s) for reviewing such decisions to determine when to resume established practices.
- And lastly, just to reinforce its importance: document, document, and document.

Incoming Students

18. **What are the expectations regarding acceptance of scores for the modified Advanced Placement (AP) exams?**

The SUNY policy on [Award of Academic Credit by Evaluation](#) establishes expectations regarding the acceptance of AP exam scores, including university-wide guarantees for such scores. Within the context of the public health emergency, the College Board modified the AP exams given in spring 2020 (for more information, see https://apcoronavirusupdates.collegeboard.org/educators).

SUNY campuses are expected to accept AP exam scores as per their published exam articulation schedule. If a department has a concern that a score on a particular exam is an incomplete assessment of a student's knowledge and if credit is granted for a course in a student's major, the department may consider requiring supplementary, no-cost learning opportunities to address any possible gaps.

19. **What are the expectations for standardized admissions tests for those applying for admission to SUNY campuses that currently require standardized test scores for admissions?**[7]

The State University of New York will suspend any required submission of SAT/ACT examination scores in determining undergraduate admissions eligibility for all SUNY 4-year degree granting colleges for the 2021-2022 academic year. This is a temporary change of admission eligibility requirements applying to the spring 2021, fall 2021, and spring 2022 admission cycles only.

SUNY will maintain its longstanding standing commitment to holistic review of student applicants that includes grades, program of study, exam scores (including Regents, AP, IB), academic achievements, non-academic achievements, and other activities that allow for the evaluation of the potential success of a candidate for admission.

Please note, in some instances test scores may still be required. Admission to select programs, consideration for some merit scholarships, and NCAA eligibility for Division I student-athletes may require test scores. International students, who are non-native English speakers and whose primary language of instruction in high school was not English, are required to demonstrate English proficiency by submitting scores from SAT, ACT, TOEFL, IELTS, or PTE.

---

[7] Derived from June 29, 2020 memorandum from SUNY Provost to campus Chief Academic Officers

20. **What are the expectations for graduate admissions for programs that require Graduate Record Exam (GRE) scores for admissions?**

There exists no SUNY-wide policy requiring GRE (or equivalent) scores for admission to graduate studies. However, certain programs may have requirements that stem from law, regulation, and/or accreditation standards (e.g., graduate-level teacher and school leader programs). In these instances, GRE (or equivalent) scores may still be required.

Program Development and Review

21. **Will SUNY continue to allow external evaluation of proposed new degree programs to be conducted remotely?**

Yes, SUNY will allow external evaluation of proposed new degree programs to be conducted remotely through June 30, 2021.

- All questions in the external evaluation form must be addressed, which means materials must be made readily available to evaluators and remote connections with relevant stakeholders must be arranged.
- For programs that involve laboratory or other facilities that would have been visited during an on-site evaluation, the campus must be able to provide a way for evaluators to virtually interact with these facilities in a manner that would substantially approximate the in-person visit (please document the means for doing so that there is a clear record of the method, which may be requested during the program review process at SUNY and/or NYSED).
- External evaluators must be approved prior to the remote evaluation. Given SUNY's commitments to diversity and inclusiveness, which includes the guiding principle that diversity and inclusiveness are integral components of the highest quality academic programs, campuses are expected to identify a diverse pool of potential evaluators and submit their CVs to SUNY (program.review@suny.edu) for consideration (please include a brief description of how this pool represents diversity).

For questions about a particular program proposal, please contact your campus program review liaison.