May 29, 2020

To: Nebraska Public School Superintendents, Non-Public School Administrators, and ESU Administrators
CC: State Board of Education, Commissioner’s Cabinet, and NDE Leadership
Re: Commissioner’s Message Regarding Graduation Ceremony Guidance and Interpretation

This document provides general guidance for school districts wishing to hold graduation ceremonies during the continuing threat of the coronavirus and should not be interpreted as a diminution of the threat of the virus. Failure to adhere to appropriate safeguards during the conduct of such graduation services could result in the continued spread of the virus.

The current and statewide Directed Health Measure (DHM) Order 2020-011 addresses both “gatherings” and “school activities” and the following are excerpts from that DHM Order. However, the Governor has issued an outline of changes that will update the Directed Health Measures allowing graduations to happen under the “Gatherings” portion of the DHM expected to change for most of the state on June 1.

The Nebraska Department of Education (NDE) is focused on following the guidance of public health experts when making decisions about the reopening of facilities and resumption of activities statewide. Restrictions may be gradually reduced, allowing greater flexibility, including in the operation of summer programming in schools. However, if in Nebraska as a whole, or within identified jurisdictions, disease rapidly increases, additional restrictions may need to be reinstated.

“Gatherings” under Phase II:
(Starting June 1, 2020 - All counties except Hall, Merrick, Hamilton and Dakota)

A gathering is defined as any event or convening that brings together more than ten (10) patrons, customers or other invitees, excluding staff, in a single room or single space at the same time, including but not limited to, pre-schools, daycare facility (including in-home facilities), gymnasium, fitness center, auditorium, stadium, arena, large event conference room, meeting hall, library, or any other confined indoor or outdoor space. This also includes weddings and funerals, as well as parades, fairs, festivals, concerts, auto racing, and other indoor and outdoor events.
(From [DHM Phase II](#))

- Gatherings will be limited to the greater of 25 people (excluding staff) or 25% of rated occupancy (not to exceed 3,000) for gatherings held at:
  - Indoor or Outdoor Arenas, Indoor or Outdoor Auctions, Stadiums, Tracks, Fairgrounds, Festivals, Zoos, Auditoriums, Large Event Conference Rooms, Meeting Halls, Indoor Theaters, Libraries, Swimming Pools, or any other confined indoor or outdoor space.
- Groups shall be no larger than six (6) individuals.
- Six (6) feet separation between groups must be maintained.
- Parades, carnivals, midways, dances and street dances, and beer gardens are prohibited through June 30th and may be extended.
- Parades where patrons remain in their vehicles and the public does not line the streets are permitted.
- Dance recitals are permitted but must follow the Gathering requirements.
- Drive-in movie theaters may open at full capacity as long as patrons remain in/on their vehicles while viewing the movie and congregating at concession and restroom areas are not permitted.
- Plans for reopening must be submitted to the local health departments and approved for all indoor and outdoor locations/venues that hold 500 or more individuals (1,000 or more in counties over 500,000 population) before reopening is permitted. The reopening plan must contain planned number of guests, how the location will meet social distancing guidelines, and sanitation guidelines.

**DHM Related to Schools (Expires on June 1, 2020):**

1. All schools; public, private and parochial: are hereby ordered to cease all in person instruction, and all extra-curricular activities except for: remote learning, child care services, meal distribution, distribution of educational materials and supplies, general building or physical plant operations and maintenance, and residential services may be continued as needed or necessary.
2. Schools are defined as public, private, and parochial elementary and secondary schools.

**Six Rules:**

The Governor has also emphasized six rules to keep Nebraska healthy:

2. Socially distance your work. Work from home or use the six-foot rule as much as possible in the workplace.
3. Shop alone and only shop once a week. Do not take family with you.
6. Exercise daily at home or with an appropriately socially-distanced activity.
Commissioner’s Interpretation and Guidance for Graduation for the Class of 2020 on or after June 1:

As such I make the following recommendation to school officials that is supported by Nebraska’s public health officials:

- The Directed Health Measure (DHM) limits apply to all types of graduation ceremonies.
- Graduation ceremonies are permissible in counties following the DHM “Gatherings” protocols for Phase II.
- All in-person graduation ceremonies and celebrations must meet the current, appropriate Directed Health Measure or should be postponed until such a time that the statewide order is lifted and when subsequent orders would clearly permit such gatherings.
- Every effort should be made to properly communicate the actions that minimize the spread of the virus during school events and for community health afterward as well. Schools should notify the public of precautions associated with private post-graduation gatherings or celebrations.

Further Considerations:

- School leaders are responsible for the safety of those who attend school-sponsored graduation ceremonies and must limit physical participation on the premises to adhere to the DHM.
- School districts may reach the decision to hold in-person graduation ceremonies after careful consideration and planning by the appropriate school personnel. Plans should be clearly communicated to the local Board of Education.

Graduation Planning Guidance:

- Provide for appropriate social distancing of both graduates and attendees.
- Provide for appropriate social distancing of both graduates and parties of guests arriving, during, and leaving the ceremony.
  - Mark standing locations of graduates waiting in line.
  - Parties of guests should be seated together at the graduation ceremony, but should maintain six feet of social distance from other parties.
  - Consider one-way direction of movements and use separate entrance and exits.
- A statement of personal responsibility to encourage those who are sick or at risk to stay home. This includes:
  - The elderly
  - People with underlying medical conditions
  - Family members who live with elderly people or those who are at risk
  - People who have access to those at risk in nursing institutions
  - People who have upper respiratory or flu-like symptoms
  - People who live with someone with upper respiratory or flu-like symptoms
People with COVID-19 or live with someone with COVID-19
- People who have been exposed to someone with COVID-19
  
  - Seating, doors, restrooms, common areas, etc. should be sanitized using CDC recommended cleaning/sanitizing practices before and after the graduation ceremony.
  
  - Fellowship, social gatherings, or other functions before or after the ceremony on the premises of the school should not be permitted as such gatherings could expose those present to the virus.
  
  - It is essential for the safety of those attending the graduation that their arrival and departure be managed in such a way as to prevent interaction between parties. Appropriate steps should be taken to dismiss and pace the departure of those present at the conclusion of the ceremony so as to prevent the interaction between parties as distances less than six feet.
  
  - School districts should discourage large graduation parties in their communities.
  
  - Schools should communicate graduation ceremony procedures and directions to all graduates and their families in advance of the ceremony.

I join you in the critical need to recognize students and families who have much to celebrate. I also ask you to join me in celebrating in the safest manner possible and generally promote protocols that allow Nebraskans to keep healthy.

Matthew L. Blomstedt, Ph.D.
Commissioner of Education