Guidance for the High School Graduation Class of 2020

During the COVID-19 response effort, local education agencies (LEAs) have the critical responsibility of ensuring students anticipated to graduate in Spring 2020 can graduate on time. In this document, LEA is defined as a school district, comprehensive career and technical center (CTC), charter school, cyber charter school, regional charter school or intermediate unit.

The document is intended to provide LEA leaders with guidance and resources as they make decisions related to current high school seniors. The Pennsylvania Department of Education (PDE) also provides regular updates and information on the COVID-19 pandemic for schools and communities on the PDE website.

It is the responsibility of each LEA to ensure no student is unjustly restricted from completing their high school graduation requirements or pursuit of a postsecondary pathway due to the current circumstances. Each LEA should review its current local graduation policies and procedures, including course, credit, and grade-based requirements, and make timely decisions related to whether the policies and procedures must be revised or suspended.

As a practice, each LEA should review the status of each senior to determine the extent to which the student is on-track for graduation, and develop a plan for each student to complete local requirements, including career and technical (CTE) education programs, during the remainder of the 2019-2020 school year, both during the closure period and at such time as school may resume. In addition to the continuity of education resources developed by PDE, guidance on providing continuity of career and technical education is located in Appendix A of this document.

State Policies

There are no statewide directed graduation requirements related to state assessments for the graduating classes of 2020 or 2021. The statewide graduation requirement outlined in Act 6 of 2017 and Act 158 of 2018 takes effect for the graduating class of 2022.

Title 22, Chapter 4 of the Pennsylvania Code (22 Pa. Code Chapter 4 (Chapter 4)) and local policies currently govern graduation requirements. LEAs should review their policies to ensure that they comply with Chapter 4 and section 121 of the Pennsylvania Public School Code (24 P.S. § 1-121).

Under Chapter 4, the following are required to meet graduation requirements:

1. Course completion and grades, and

2. Demonstration of proficiency or above in each of the State academic standards as determined by the LEA.

A student with a disability may satisfy graduation requirements in one of two ways.

1. A student with an Individualized Education Program (IEP) may graduate through the fulfillment of high school graduation requirements set forth in Chapter 4.

2. A student with a disability who satisfactorily completes a special education program developed by an IEP team, and does not otherwise meet the requirements set forth in Chapter 4, shall be granted and issued a regular high school diploma by the school district of residence, charter school (including cyber charter school) or career and technical center, if applicable. (See 22 Pa. Code § 4.24(g))

Frequently Asked Questions

LEAs are advised to consider the following questions and answers when reviewing and revising, if applicable, their local graduation policies and requirements.

I. Academic Requirements

Can current seniors graduate at the end of the 2019-2020 school year?

Yes. LEAs are responsible to ensure that the students anticipated to graduate in Spring 2020 graduate on time. No student should be restricted from completing their high school graduation requirements or pursuit of a post-secondary pathway due to the pandemic of 2020.

What academic requirements will be required of current seniors in the 2019-2020 school year?

Establishing and calculating credits for coursework is the responsibility of each LEA. If a graduating senior is unable to complete their coursework for the 2019-2020 school year due to school closure, illness, family illness, or related COVID-19 issue, the Department suggests the LEA use discretion to determine whether the student has completed sufficient course content to satisfy the LEA's established policies for course completion and academic proficiency. The Department recommends that LEAs provide all reasonable latitude for students to graduate on time.

How should LEAs assign course grades to graduating students during or after COVID-19 related closures?

Calculating and assigning grades for coursework is the responsibility of each LEA. However, the Department encourages LEAs to assign grades based on the information available. If students have not completed a course in its entirety, chief school administrators should consider if they have enough information to calculate and assign a grade. LEAs that use a block schedule may

be in a unique position in that students may have less data available. For this reason, an LEA may want to consider modifying or waiving existing local policies for the 2019-2020 school year.

Districts should provide support for students in grade 12 who are failing a course as of March 13, 2020 and provide them the opportunity, to the extent feasible, to demonstrate learning in the subject matter of the course and receive credit for the course.

Are graduating seniors required to complete a minimum number of instructional hours and school days for the 2019-2020 school year?

No. Students, like LEAs, will not be penalized for not meeting the minimum 180-day requirement as a result of COVID-19 closures.

Should LEAs provide any type of instruction to seniors during and after COVID-19 related closures?

PDE strongly encourages all LEAs to provide some type of continuity of education for all students, including seniors, in the most appropriate and accessible ways possible, while also honoring the Governor's guidance for aggressive social distancing.

Continuity of education is the broad term given to educational practices that occur in the event of a prolonged school closure. Schools may provide continuity of education through Planned Instruction and/or by offering Enrichment and Review activities. [Additional information about continuity of education](#) is available on the PDE website.

Can summer school be offered to current seniors if needed?

Summer school is the responsibility of each LEA, but would be subject to any Commonwealth restrictions, closures, or social distancing recommendations that may be in effect at the time. Credit recovery programs may also be available. Chief school administrators should consider expense, ability and access for students when offering summer school options.

II. Students with Individualized Education Programs (IEPs)

In addition to the information below, LEAs should [review the Graduation Requirements for Students with Disabilities Basic Education Circular (BEC)](#) on PDE's website.

How should LEAs address graduation for students with IEPs who are expected to graduate in Spring 2020?

Chapter 4 and local policies continue to govern graduation requirements for students with IEPs. A student with disabilities may graduate either through the fulfillment of high school graduation requirements set forth in Chapter 4 (relating to academic standards and assessment) or upon the completion of their IEP goals, as determined by the IEP team. (See 22 Pa. Code § 4.24(g))

Can the IEP team meet to determine the appropriateness of graduation due to the COVID-19 school closure?

Yes. IEP teams may meet virtually or by phone to consider the impact of the COVID-19 school closure and make determinations based on each student's circumstances.

III. Assessment

If Keystone proficiency, supplemental instruction, or Project Based Assessments are part of an LEA's current graduation policy, what actions need to be taken for the seniors expected to graduate in 2020?

On March 19, 2020, Secretary of Education Pedro Rivera canceled administration of the Pennsylvania System of School Assessments (PSSA), Keystone Exams, and Pennsylvania Alternate System of Assessments (PASA) for the 2019-2020 school year due to the COVID-19 response efforts. LEAs are reminded that state law does not require students demonstrate proficiency on one or more Keystone Exams or the PASA to graduate. Therefore, LEAs should consider, if necessary, suspending or changing their local policies to accommodate graduating seniors. LEAs are responsible for ensuring no student is unjustly restricted from completing their high school graduation requirements or pursuing a post-secondary pathway due to the pandemic of 2020.

Are Graduation Projects/Senior Projects required?

Chapter 4 does not require students to complete graduation projects. LEAs that have a senior project/graduation project as part of their local graduation requirements either will need to consider waiving the requirement or giving students credit for work completed to date. This may require action by the LEA's governing body to suspend or change current policy.

Are LEAs expected to give final exams in 2019-2020?

Final exams and their effect on grading policy are strictly a local decision. Chief school administrators should consider whether to cancel their final exams and modify their grading policies accordingly. This may require action by the LEA's governing body.

Can a student enrolled in a CTE program graduate if they are unable to take the NOCTI, NIMS or other industry-based competency assessment due to the statewide closure of schools?

Yes, a student enrolled in an approved CTE program may graduate during the 2019-2020 school year without taking or passing their associated industry-based competency assessment. A CTE Concentrator may graduate if they have demonstrated a high likelihood of success on an approved industry-based competency assessment or readiness for continued meaningful engagement in the CTE Concentrator's program of study as demonstrated by performance on benchmark assessments, course grades and other factors consistent with the CTE Concentrator's goals and career plan. The Department recommends that LEAs provide all reasonable latitude for CTE students to graduate on time.

How does the COVID-19 school closure affect AP, IB, SAT, and ACT testing?

Each testing service has information about how they are responding to COVID-19 on their respective websites. Some tests have been canceled or rescheduled.

- [College Board Advanced Placement (AP)](#)
- [International Baccalaureate (IB) Program](#)
- [SAT](#)
- [ACT](#)

College Board is offering online reviews daily and is modifying the AP test so that it can be taken at home. Many colleges are waiving SAT and ACT requirements for students entering in the Fall of 2020. LEAs are encouraged to share this information with students. Students also should contact postsecondary institutions directly about admission criteria in light of the COVID19 response effort.

IV. Career and Technical Education

In addition to the information below, LEAs are advised to review Appendix A which provides additional guidance on providing continuity of career and technical education for all CTE students.

Are seniors enrolled in a Comprehensive CTC expected to meet graduation requirements for the 2019-2020 school year?

Yes. Like school districts and other LEAs, Comprehensive CTCs will need to make local determinations as to whether graduation policies need to be revised or suspended to reflect the current circumstances. No student should be unjustly harmed in their completion of a high school graduation pathway or pursuit of a postsecondary pathway because of the COVID-19 pandemic. Before changing any graduation policies, Comprehensive CTCs should consult with their Joint Operating Committee (JOC), Professional Advisory Council (PAC) and Superintendents of Record from the sending districts.

Should a part-time CTC identify and outline the current graduation requirements, including course, credit and grade-based requirements, with the PAC or Superintendent of Record to identify what changes need to be made as a result of COVID-19 related school closures?

Yes. Part-time CTCs should work with sending LEAs to determine what is needed from the CTC so sending LEAs can determine the specific graduation requirements of their students.

How does an LEA determine grades for CTE coursework when school has been closed due to COVID-19 response efforts?

The LEA can decide if grades are based on task list completion to the date of the COVID-19 related school closure. Students in grades 9, 10, and 11 can make up tasks next year. If students are completing CTE coursework at a part-time CTC, the CTC will need to send the student grades to the sending LEA.

What steps should be taken for students who are currently not passing the CTE program?

Each CTC Director and Superintendent of Record need to decide how to address students not passing the CTE program and what steps can be taken to get them to performance level(s) that will permit the students to graduate.

Who is responsible for ensuring seniors attending a CTC attain academic standards?

At a Comprehensive CTC, it is the responsibility of the CTC. The CTC should assist students having difficulty in attaining academic standards in meeting requirements and graduating on time.

Although academic standards are integrated into CTE lesson plans within part-time CTCs, sending LEAs are responsible for ensuring the students they send to the CTC attain the academic standards. Although not their ultimate responsibility, the CTC should continue to provide assistance to students having difficulty in attaining academic standards.

Who is responsible for developing a list of individuals who qualify for the award of diploma?

At a Comprehensive CTC, the Director is responsible. At a part-time CTC, the teacher, guidance counselor, and CTC Director should work together to inform sending LEAs.

Can CTE students graduate if they do not earn an industry credential?

Industry credentials are not a state requirement for graduation; they are an alternative pathway to graduation starting with the graduating class of 2022. Each LEA offering CTE programs should consider which credentials students can earn through distance learning or if students can earn industry credentials(s) at a later date.

Can teachers report to the school and work only with the seniors in order to finish technical instruction during the COVID-19 school closure?

No. Under Governor Wolf's directive, all schools in Pennsylvania are closed, meaning all physical locations are closed, activities and events are canceled, and specific interventions and supports are conducted remotely, if they are conducted at all.

Can the time spent in a CTE program be applied toward graduation during the COVID-19 school closure?

Each CTC and member district has its own policy regarding time spent in CTE and the number of credits required for graduation.

V. Postsecondary Considerations

LEAs are responsible for ensuring no student is unjustly restricted from completing their high school graduation requirements or pursuing their chosen postsecondary pathway due to the pandemic of 2020.

How might COVID-19 related school closures impact students' high school transcripts?

This is an LEA decision. LEAs may want to consider noting on student transcripts or sending a letter along with transcripts that courses were abbreviated or grading polices were amended for the 2019-2020 school year, as a result of the pandemic, to aid a student's ability to enroll in postsecondary institutions after graduation or pursue other postsecondary pathways, including apprenticeships and employment.

Should GPAs or class rank be modified for the 2019-2020 school year?

The calculation of class rank and GPA are a local decision made by each LEA. If an LEA chooses to use pass/fail grades, it will need to be addressed in the local grading policy. Prior to amending any policies, LEAs should consider how the change may impact students' abilities to enroll in postsecondary institutions after graduation or pursue other postsecondary pathways, including apprenticeships and employment.

Should seniors continue concurrent enrollment courses with institutions of higher education (IHEs)?

Many IHEs have moved to online course delivery during COVID-19 related closures. School counselors and administrators should assist students in working cooperatively with IHEs and, to the greatest extent possible, make it possible for students to complete their concurrent enrollment coursework. Any student participating in concurrent enrollment who receives college credit should be considered as completing the course and receiving a grade/credit at the high school in accordance with local policies.

What happens when a student is earning credit for Cooperative Education (co-op) and cannot return to the co-op work site due to a COVID-19 closure or illness?

The LEA should place the student into an appropriate educational program at the student's home school. Schools are encouraged to develop a continuity of education plan that ensures students are not unduly disadvantaged.

VI. Graduation and End-of-Year Activities

Should LEAs hold high school graduation ceremonies and traditional end-of-school year activities?

LEAs may hold only virtual high school graduation and other traditional end-of-school year ceremonies during the COVID-19 closure. The safety and security of all students and the school community are a priority for the commonwealth and all chief school administrators. Currently, restrictions on gatherings larger than 10 - people and aggressive social distancing

recommendations are in place across the Commonwealth. When closure restrictions are lifted by the Governor, LEAs may consider the appropriateness of holding such gatherings.

How will schools distribute scholarships and academic awards?

Distribution of scholarships and academic awards is an LEA decision. LEAs should continue to engage postsecondary institutions and other outside organizations who provide student scholarships to ensure that the class of 2020 has access to the same financial assistance that would have been afforded them if the COVID-19 related school closures had not occurred. School counselors should be proactive in sharing information on enrollment and financial aid with students and their families.

What is the status of the 2019-2020 athletic season?

As of March 31, 2020, the PIAA has continued to postpone the winter sports championships and the opening of spring sports. Decisions regarding winter and spring sports will be made as further information becomes available. For more information, visit the PIAA website.

Appendix A: Career and Technical Education Frequently Asked Questions Related to COVID-19 State-mandated School Closures

The Pennsylvania Department of Education (PDE) understands that the mandated closure of Pennsylvania schools due to the COVID-19 response effort creates uncertainty regarding career and technical education programs for the remainder of the 2019-2020 school year.

Below is a list of general questions and answers related to the delivery of career and technical education (CTE) and students enrolled in CTE programs. PDE will update this document with additional guidance as needed.

General

1. **Are seniors enrolled in a Comprehensive Career and Technical Center (CTC) expected to meet graduation requirements for the 2019-2020 school year?**

   Yes. Like school districts and other local education agencies (LEAs), Comprehensive CTCs will need to make local determinations as to whether graduation policies need to be revised or suspended to reflect the current circumstances. No student should be unjustly harmed in their completion of a high school graduation pathway or pursuit of a postsecondary pathway because of the COVID-19 pandemic. Before changing any graduation policies, Comprehensive CTCs should consult with their Joint Operating Committee (JOC), Professional Advisory Council (PAC) and Superintendents of Record from the sending districts.

2. **Should a part-time CTC identify and outline the current graduation requirements, including course, credit and grade-based requirements, with the PAC or Superintendent of Record to identify what changes need to be made as a result of COVID-19 related school closures?**

   Yes. Part-time CTCs should work with sending LEAs to determine what is needed from the CTC so sending LEAs can determine the specific graduation requirements of their students.

3. **How does an LEA determine grades for CTE coursework when school has been closed due to COVID-19 response efforts?**

   The LEA can decide if grades are based on task list completion to the date of the COVID-19 related school closure. Students in grades 9, 10, and 11 can make up tasks next year. If students are completing CTE coursework at a part-time CTC, the CTC will need to send the student grades to the sending LEA

4. **What steps should be taken for students who are currently not passing the CTE program?**

   Each CTC Director and Superintendent of Record need to decide how to address students not passing the CTE program and what steps can be taken to get them to performance level(s) that will permit the students to graduate.

5. **Who is responsible for ensuring students attending a CTC attain academic standards?**

At a Comprehensive CTC, it is the responsibility of the CTC. The CTC should assist students having difficulty in attaining academic standards in meeting requirements and graduating on time.

Although academic standards are integrated into CTE lesson plans within part-time CTCs, sending LEAs are responsible for ensuring the students they send to the CTC attain the academic standards. Although not their ultimate responsibility, the CTC should continue to provide assistance to students having difficulty in attaining academic standards.

6. **Who is responsible for developing a list of individuals who qualify for the award of diploma?**

At a Comprehensive CTC, the Director is responsible. At a part-time CTC, the teacher, guidance counselor, and CTC Director should work together to inform sending LEAs.

7. **Can CTE students graduate if they do not earn an industry credential?**

Industry credentials are not a state requirement for graduation; they are an alternative pathway to graduation starting with the graduating class of 2022. Each LEA offering CTE programs should consider which credentials students can earn through distance learning or if students can earn industry credentials(s) at a later date.

CTE Instruction

8. **Can teachers report to the school and work only with the seniors or small groups of students in order to finish technical instruction during the COVID-19 school closure?**

No. Under Governor Wolf's directive, all schools in Pennsylvania are closed, meaning all physical locations are closed, activities and events are canceled, and specific interventions and supports are conducted remotely, if they are conducted at all.

9. **Can the time spent in a CTE program be applied toward graduation during the COVID-19 school closure?**

Each CTC and member district have their own policy regarding time spent in CTE and the number of credits required for graduation.

10. **Is distance education an option for providing career and technical education during the COVID-19 school closure?**

Yes, LEAs, including CTCs, may use distance education to provide career and technical education during that school closure.

11. How do CTCs ensure students have technology?

To ensure equity and access for all students CTCs should ensure technology is available to all students. To determine access, a CTC can conduct a survey of students, instructors and parents/guardians to determine who has internet, computer with internet, or mobile devices with internet. The CTC should consider how they will distribute technology to students who need technology.

12. What methods and resources should CTCs and LEAs with CTE programs consider for staff training?

- Determine what staff need training and the means to train teachers who are not familiar with distance education system(s). Identify those teachers who can train other teachers virtually. Additionally, identify CTE instructors from similar Classification of Instructional Programs (CIPS) at neighboring CTCs and districts to share enrichment ideas that can be done at home.

- Provide time for staff to gather needed resources from the CTC or LEA that they will need to plan and deliver distance learning while continuing to honor the Governor's guidance for aggressive social distancing.

- Consider using video technology so teachers can develop their own instructional content, or review YouTube or other resources on video sharing sites for use in the digital classroom.

- Develop communications strategies for teachers to collaborate on instructional methods using distance education platform(s).

- Provide online CTE software (i.e. automotive) for the students to learn and to earn industry certifications.

13. How does a CTC handle member districts that choose different steps, planned instruction, resources, or no instruction during COVID-19 school closure?

All schools are encouraged to develop a continuity of education plan that ensures students are not unduly disadvantaged. CTCs should consider how to deliver education to all CTE students even if the sending LEAs choose not to provide instruction. Sending LEAs need to ensure no student is unduly disadvantaged.

14. Can CTCs and LEAs with approved CTE programs use distance education related to employability skills during the COVID-19 school closure?

Yes, under Perkins V, employability skills are required to be part of the CTE program. CTCs should identify resources to support CTE teachers to teach employability skills and assess student competence and knowledge. Teachers should reference the Career Education and Work academic standards for grade 11 and develop relevant activities related to those standards. CEW Standards are available on the State Board of Education's website.

15. What can staff do to continue to provide CTE during school closure due to COVID-19?

- o **Paraprofessionals**
  - Hold virtual office hours with teachers
  - Assemble instructional packets that can be sent to students
  - Professional development (PD): Free online professional development resources, existing PD resources (e.g., related to textbook adoption)
  - Materials development
  - Online tutoring: provide online assistance with current content in CTE programs
- o **Instructional Coaches**
  - Professional development: Free online professional development resources, existing PD resources (e.g., related to textbook adoption)
  - Materials development
  - Online course work: Develop materials to facilitate online classes or class assignments
- o **Professional tutors**
  - Professional development: Free online professional development resources, existing PD resources (e.g., related to textbook adoption)
  - Materials development
  - Online tutoring: provide online assistance with current content in CTE programs
- o **Student services coordinator**
  - Professional development: Free online professional development resources, existing PD resources (e.g., related to textbook adoption)
  - Materials development
  - Online services: Be available for webinar type meetings/ chats with students who need help

Cooperative Education

16. How can teachers use technology to deliver CTE education during the COVID-19 school closure?

Teachers can develop online learning and have students use YouTube or other video sharing resources for the skills training portion. Cooperative Education students still participating in Cooperative Education can also demonstrate skills using this method. Teachers select the video for students to watch and students write reflections for teachers to read. Teachers and other volunteers (with clearances) could hold mock interviews for students via online video and conferencing platforms.

17. If businesses have closed and released the students from their Cooperative Education placement, do the students return to the CTC during the COVID-19 school closure?

Each CTC should review and follow its policy regarding students returning from Cooperative Education. The LEA should place the student into an appropriate educational program at the student's home school

18. If a school is closed and the student remains in their Cooperative Education placement, does the school still need to meet the requirements of 22 Pa. Code § 339.29 (related to Cooperative Vocational education)?

No, if the school is closed and not providing instruction, students should not remain in Cooperative Education. If the school is providing continuity of education, the student can remain in Cooperative Education.