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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

April 20, 2021

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(X) Informational

BULLETIN NO. 024-21 OFFICE OF SYSTEM AND SCHOOL IMPROVEMENT

TO: Educational Service District Superintendents
School District Superintendents
School District Business Managers
School Principals
Special Education Directors
Career and Technical Education Directors
District Assessment Coordinators
CEDARS Administrators
School Counselors
Career Counselors and Specialists

FROM: Chris Reykdal, Superintendent of Public Instruction

RE: Guidance for Supporting Class of 2020 and 2021 Seniors

CONTACT: See Contact Information on Page 10

PURPOSE/BACKGROUND

As schools, seniors, families, and communities work together to support seniors continued learning and post-high school preparation during the COVID-19 public health crisis, the Office of Superintendent of Public Instruction (OSPI) is providing ongoing guidance as needed. This bulletin provides guidance on helping seniors prepare to graduate, including further explanation of the 2020–21 Graduation Requirement Emergency Waiver (which in this document will be referred to as the “GREW,” for short). The GREW is a last resort option to help seniors who are prepared to graduate make needed adjustments to meeting their credit and/or graduation pathway requirement, as described in [Chapter 180-11 WAC](#), Emergency Waiver of Certain Graduation Requirements.

This bulletin addresses information specific to supporting high school seniors in the areas of:

1. Meeting Graduation Requirements (pages 2–6)
2. Transcript and Data Reporting Requirements (pages 6–7)
3. Special Education Services (pages 7–8)

4. Alternative Learning Settings (page 8)
5. Supporting Seniors' Emotional Well-Being (page 9)
6. Graduation Ceremonies (page 10)

MEETING CLASS OF 2020 AND 2021 GRADUATION REQUIREMENTS

As we continue to transition back from remote learning, seniors who are prepared to move on to a meaningful first step after high school need reassurance that they can graduate this year. District and high school staff should prioritize meeting the specific graduation requirement needs for seniors that best help them prepare for their post-high school plan. This section includes details concerning determining the need for a waiver, available waivers, credit requirements, High School and Beyond Plans (HSBP), graduation pathways, local graduation requirements, and graduating in summer 2021.

Determining If a Waiver is Needed

When making decisions about whether a senior needs to use a GREW, either to waive credits and/or a graduation pathway, school staff should start by working with the student to ensure the relevancy of their post-high school plan as articulated in their High School and Beyond Plan (HSBP). Additional relevant academic plan information may be found in the student's:

- Written Student Learning Plan if an ALE student, or
- IEP Transition Plan Course of Study if the student is receiving special education services.

Once the senior's post-high school plan is confirmed, staff can determine what credits are still needed and what graduation pathway(s) are most likely to prepare the senior for their post-high school plan. As part of this review, per State Board of Education (SBE) rules, staff must verify that the student was "reasonably expected to graduate" [WAC 180-111-020\(5\)](#). This means the student had capacity and a plan of action to complete all state minimum graduation requirements for their graduation year cohort within the 2020–21 school year, which could include planned summer coursework.

Any senior for whom a GREW might be considered must be provided individual advising to determine how they might meet any remaining graduation requirements, including the possibility of finishing in the summer. Returning for a partial or full year of high school should also be encouraged as an option for seniors who need a GREW and also lack a clear plan for moving forward and/or express concern about being prepared to graduate.

Use of the GREW should be considered a last resort and only utilized if the student is prepared to graduate and working toward a feasible post-high school plan but was unable to meet all graduation requirements because of impacts from COVID-19. This individual advising process must be carried out prior to using the GREW to waive requirements.

Other Available Waivers and Flexibility

Per [WAC 180-111-040\(2\)](#), before applying a GREW for up to 2.0 “core” or “flexible” credits, of which no more than 1.0 credit can be in any given core subject area, districts must first use their authority to waive credits or other local graduation requirements using the following options:

- Two-credit waiver of “flexible” credits for individual student circumstances (e.g., electives and Personalized Pathway credits).
- Local graduation requirements can be waived (e.g., additional courses beyond minimum state requirements, community service, senior project, etc.).
- Seniors may be excused from a physical education course per [WAC 180-51-210\(4\)\(f\)](#).
- Washington State History may be waived for eligible seniors per [WAC 180-51-210\(4\)\(d\)\(iv\)](#).

Credit Requirements

Schools must have made a “good faith effort” as described in [WAC 180-111-020](#) and OSPI’s [Bulletin 022-20](#) issued March 20, 2020, to provide seniors with multiple options to demonstrate learning or mastery of content and provide accommodations to individual seniors, as needed. Seniors must also be advised about what credits are still needed to ensure preparation for their post-high school plan and how they can complete them prior to graduation.

In addition to what OSPI published in Bulletin 022-20 last spring, other options that can help seniors meet credit requirements, including resolving any remaining “Incompletes” from last spring, include:

- Use non-letter grade indicators that grant credit, such as “P-pass,” “CR-credit,” or “S-Satisfactory” transcript designations instead of letter grades (A–F)
 - See OSPI’s [Student Learning and Grading Guidance](#) published April 21, 2020, for additional guidance.
- Mastery-based credit
 - For subject areas where there is a define progression of learning standards (e.g., ELA, math, world language), schools can grant credit for prior courses that were failed or not completed based on successful completion of the next higher-level course in the same subject.
 - A district must have a written policy for awarding mastery-based credit detailing which subjects or courses are eligible ([WAC 180-51-051](#)).
 - See [WAC 180-51-051\(4\)](#) for additional options to earn credit through demonstrated mastery of learning standards.
- 2 for 1 policy
 - Per [WAC 180-51-210\(g\)\(i\)](#), CTE courses locally determined to be equivalent to existing standards in a non-CTE course may be used to meet two graduation requirements with a single 1.0 credit course.
 - Districts could apply mastery-based credit to allow a course that qualifies as a 2 for 1 to accrue 2.0 credits instead of just 1.0 credit.

Graduation Pathways

School staff need to first determine which graduation pathway(s) seniors still have the potential to complete this spring, in alignment with their High School and Beyond Plans (HSBP). OSPI's [Class of 2021 Graduation Pathways Toolkit](#) and the [SBE website](#) can provide additional details to support making those determinations. Priority support should be given to seniors trying to graduate who need to complete specific coursework and/or access exams offered during this academic term to meet their chosen graduation pathway.

Exam-Based Graduation Pathways

Access to many of the exam-based graduation pathways has been restricted or unavailable since March 2020. Prior to using a GREW, staff must determine if the senior can still take any exams that meet this requirement and can indicate the senior has "demonstrated postsecondary preparation" for their post-high school plan. To support seniors' decisions about meeting their graduation pathway or using a GREW, consider the following:

- ACT/SAT exams – Washington's public 4-year colleges and many private colleges have removed ACT/SAT exam scores as a requirement for admissions, although seniors who have scores may still submit them for consideration. Staff should determine if the senior needs to submit a score for admission.
- AP/IB/Cambridge exams – the AP/IB/Cambridge organizations can help schools provide access to online and/or in-person versions of these exams. Seniors should be provided access to take spring 2021 exams either online or in-person when possible, per local safety and health guidelines.
 - See the [Class of 2021 Graduation Pathways Toolkit](#) for a list of exams and corresponding scores that can count as graduation pathways for ELA and math.
- ASVAB – seniors planning to enlist in the military can take the online PiCAT or, when provided within current health and safety guidelines, an in-person ASVAB this spring.
- SBA and WA-AIM exams – meeting standard on the SBA or WA-AIM is not required unless a senior chooses to use the exam to demonstrate "postsecondary preparation."

Course-Based Graduation Pathways

Access to some course-based graduation pathways has been fairly challenging for seniors learning in a virtual learning environment. Prior to using a GREW, staff must determine if the senior can still complete any courses that meet this requirement and can indicate the senior has "demonstrated postsecondary preparation" for their post-high school plan. To support seniors' decisions about meeting their graduation pathway or using a GREW, consider the following:

- AP/IB/Cambridge courses – provide additional academic supports for seniors needing help to meet the C+ grade requirement for spring term.
- Running Start – assist seniors in enrolling in course(s) during spring quarter to meet their graduation pathway requirement.
- CTE Course Sequences – determine if completing a current course sequence can meet approval requirements for a CTE graduation pathway and/or demonstrate a senior's preparation for their post-high school plan.

Transition from Expedited Assessment Appeals (EAA) Waiver to GREW

The EAA Waiver that has previously been available to waive the assessment or graduation pathway requirements ended with the Class of 2020. However, in the newly updated [WAC 180-111-020\(1\)\(b\)\(xi\)](#), under the “demonstrated postsecondary preparation” definition, the same options to show readiness for a meaningful first step after high school that were in the EAA waiver are also in the 2020–21 GREW.

OSPI will soon develop a new data collection process for the GREW, similar to the previous EAA data collection, that will assist OSPI in gathering data on which seniors are using the GREW to waive their graduation pathway.

High School and Beyond Plans (HSBP)

HSBP requirements are not eligible to be waived under the 2020–21 GREW. School staff need to work with seniors to ensure they complete all [required elements of their HSBP](#) and determine locally if seniors have met this requirement.

Additionally, the HSBP is intended to serve an integral role in supporting staff efforts to administer the GREW. Prior to granting a GREW, the senior’s HSBP should be used to:

- Determine if a senior’s ability to “demonstrate postsecondary preparation” connects to their planned next step, as identified in their HSBP.
- Determine what credits and/or graduation pathway(s) must still be completed to ensure the senior is eligible to access their postsecondary plan, as articulated in their HSBP.
 - Waived credits are limited to the classes impacted by the COVID-19 disruption.
 - Prioritize completion of core credits most applicable to the senior’s HSBP.
- Consult with and notify seniors and their families of any potential benefits and limitations that may result from using a GREW and that may impact a student’s postsecondary plans, as articulated in their HSBP.

Note: Seniors earning an Associate Degree through Running Start may receive a high school diploma through the college, which removes the HSBP as a graduation requirement.

Local Graduation Requirements

For districts that choose to maintain local graduation requirements, such as community service or senior projects, OSPI encourages the provision of alternatives if social distancing and safety measures cannot be maintained and sufficient support to seniors in completing these requirements.

Also, per [WAC 180-111-040\(2\)](#), before granting a senior access to using a GREW for up to 2.0 additional “core” or “flexible” credits, of which no more than 1.0 credit can be in any given core subject area, districts must first use their authority to waive additional credits required above the state minimum subject area requirements.

Graduating in Summer 2021

If summer school is being contemplated to help seniors earn needed credits or complete a graduation pathway rather than using a GREW, schools should consider the following:

- Dual credit courses, including AP/IB/Cambridge/CHS/CTE Dual Credit, could be accessed through the high school over the summer, if teachers are available and have the appropriate training to provide those learning opportunities.
- Running Start funds are not available to cover tuition for the summer quarter, but seniors could choose to take a college course to meet their remaining graduation requirement(s). Districts may provide support for covering the cost of tuition for seniors needing a summer college course to meet graduation requirements.
- Completion of a CTE Course Sequence in summer school or at a skill center could meet a graduation pathway requirement and result in greater career or college preparation through skill development and attainment of an industry recognized credential.

Given the condensed nature of summer school, both staff and seniors engaging in dual credit courses would need to be prepared for an intensive educational experience. If you are interested in this opportunity, please contact OSPI's Dual Credit Program Supervisor, Jason Boatwright at jason.boatwright@k12.wa.us.

Transcript and Data Reporting

This section provides transcript and data reporting guidance to meet the requirements in [WAC 180-111-040\(4\)](#) and [WAC 180-111-050\(1\)](#).

Transcripts

The 2021 emergency rules outlined in [WAC 180-111-040\(4\)](#) require that the Washington State Standardized K–12 transcript includes a notation that identifies waived credits and waived graduation pathways. Last Spring, OSPI designated a new grade value of "V" to indicate courses waived due to an inability to complete or take planned courses that spring term as a result of school closures from COVID.

This same convention will be used to identify courses waived this school year, which includes possible course taking through August 31, 2021. On both the transcript and in the district CEDARS submission, a grade value of "V" will be used to indicate courses waived under this WAC.

- For the 2020–21 school year, the "V" can be used for up to 2.0 credits.
- The "V" indicates courses not taken, not completed, or failed, and that were then waived as part of the GREW's 2.0 credits of core or elective credit, as described in [WAC 180-111-050\(1\)](#).
- Courses locally waived for individual student circumstances or any other local authority or state flexibility are not marked with the "V".
 - Courses waived using other available flexibility options should be documented in the senior's HSBP and/or cumulative file for possible future reference.

Additionally, [WAC 180-111-040\(4\)](#) requires that the status of seniors' graduation pathway requirement be noted on the Washington State Standardized K–12 transcript. Available options for Class of 2020 and 2021 seniors through 8/31/2021 include "MET," "NOT MET," or "WAIVED."

- Any seniors choosing to return in the fall should have either "MET" or "NOT MET" reflected on their transcript. There is currently no provision for waiving Graduation Pathways with the GREW after August 31, 2021.

The Transcript Users [Guide](#) and the [CEDARS manual](#) for this year will be updated by the end of April 2021 to reflect this information.

Data Reporting

Through OSPI's Education Data System (EDS), school districts can access graduation pathway information for seniors in the classes of 2020 and 2021 as established in [WAC 180-51-230](#). The Pathways Database can be used by districts to understand what OSPI will use for the annually required legislative report due in December of every year, but it should not be used as the sole source to verify seniors' graduation pathway status. The Pathways Database uses data from OSPI's CEDARS data and ACT/SAT/AP/IB and Cambridge data obtained through data sharing agreements.

For information or technical assistance, visit the Graduation Pathways webpage or contact OSPI at graduation.pathways@k12.wa.us.

SPECIAL EDUCATION SERVICES

As districts develop policies and procedures to implement the [emergency waiver program](#), there must also be consideration given to how to best measure and support seniors eligible for special education services to demonstrate their postsecondary preparation, including how additional support can be provided.

IEP teams should be evaluating student progress data and senior's HSBP's, and collaborating to determine whether a student may require the GREW, additional supports for a successful postsecondary transition and/or 18–21 services (see CONTINUATION OF SPECIAL SERVICES section).

Districts should keep the following priorities in mind:

- Ensure that seniors with disabilities have access to the same support, personnel, and flexibilities available to all seniors.
- Communicate with seniors and families regarding the potential need for flexibility and adjustments to a senior's graduation plan.
- Make provisions to provide for any IEP Transition Plan services and supports, including recovery services that may be needed.

Certificate of Individual Achievement (CIA) Options

If specified in their Individualized Education Program (IEP), Class of 2020 and 2021 seniors receiving special education services may still use the following CIA options to demonstrate their preparation for their post-high school goals:

- CIA Cut Score on Regular (On-Grade) Assessment
- Off-Grade Level Assessment on Regular or Alternate Assessment
- Locally Determined Assessments (LDA)
 - The LDA satisfies a graduation pathway requirement for the CIA if the school and IEP team review all options and determine the LDA is the best option to support a student.
 - Additional details about the LDA are on page 15 of the [Class of 2021 Graduation Pathway Toolkit](#).

Find detailed information about these additional options to demonstrate postsecondary preparation on OSPI's [CIA and Waivers webpage](#).

Continuation of Special Services

If the IEP team determines and documents in an IEP that a student has not met the graduation requirements or that the student's graduation requirements include 18–21 services, the student can continue to receive services until the school year in which they turn 21. Additionally, Kevin's Law ([RCW 28A.155.170](#)) allows a student who will continue to receive 18–21 services to receive a certification of attendance and participate in any graduation-related activities.

Individualized Education Program (IEP) Team Course Substitutions

When determined necessary by the student's IEP team due to the unique needs resulting from a student's disability, a graduation credit and subject area requirement may be substituted with coursework that is comparable in scope and content, as identified in the IEP Transition Plan Course of Study and aligned to the student's HSBP ([WAC 180-51-115](#)).

- To learn more about comparable course substitution, see page 8 of the [February 2021 Special Education Monthly Update](#).

Ending Special Services Due to Graduation

A reevaluation is not required to terminate a student's special education eligibility due to graduation; however, there are other requirements that must be met in making this determination:

- Each student must be provided with a Summary of Performance ([WAC 392-172A-03030](#)). OSPI has created a [model Summary of Performance form](#).
- See the Center for Change in Transition Services webpage for [Summary of Performance guidance and examples](#).
 - Graduating from high school with a regular high school diploma constitutes a change in placement and therefore requires a written prior notice ([WAC 392-172A-02000\(2b\)](#)).

ALTERNATIVE LEARNING SETTINGS

While staff in alternative settings may deliver instruction differently from comprehensive schools, all the guidance included in this bulletin applies to alternative schools. Districts are encouraged to build upon the flexibility inherent in your unique alternative model to meet the needs of your seniors and ensure that any communication of, and eligibility for, a GREW is implemented equitably across all high school settings.

Options for Seniors in the Classes Of 2017, 2018, 2019

Seniors in graduating classes prior to 2020 do not have access to the 2020–21 GREW. For these seniors, options to provide flexibility with meeting graduation requirements for their graduating class may include:

- the Expedited Assessment Appeals (EAA) Waiver,
- the two-credit waiver for individual student circumstances, if the school was implementing the 24-credit diploma requirements,
- the locally determined graduation requirements above state minimum requirements, or
- the applicable waiver of PE and WA State History per [WAC 180-51-210\(4\)](#).

SUPPORTING SENIORS' EMOTIONAL WELL-BEING

Many seniors are questioning or pursuing alternatives to their original post-high school plan and may need additional guidance and support to determine, prep for, and achieve their post-high school goal.

Depending on seniors' needs, some additional trauma-informed, social-emotional, and transition supports schools may want to consider providing include, but are not limited to:

- Offering supervised/staffed digital forums for seniors to connect, manage stress and anxiety, share positives, and get help with overcoming the challenges they are dealing with in planning and preparing for their future.
- Reassuring seniors that colleges nationwide are being asked to provide flexibility with final admission selections, including completion of specific course requirements and increased support for this year's seniors' transition into higher education.
- Connecting seniors directly to resources on their college campus where basic needs can be met or where supports are located (food, housing support, diversity services, financial support, etc.).
- Providing opportunities to assist seniors in applying for jobs by offering direct support, either from school staff or community organizations, to develop cover letters and adjust résumés.
- Connecting seniors to community- or school-based clothing closets to access wardrobe options more appropriate for a job interview.
- Offering job interview practice sessions can help seniors reduce anxiety and practice the self-advocacy and public speaking skills needed in most interview situations.

GRADUATION CEREMONIES

The Department of Health posted their [Graduation and Commencement Ceremony guidelines](#) for K–12 education, which along with current local health and safety guidelines, should guide districts' decisions about how to honor their seniors this spring.

The main takeaways from this guidance include:

- Decisions to host graduation ceremonies remain at the district level, as long as they are in alignment with the [Healthy Washington Roadmap to Recovery Plan](#).
- Ceremonies must follow the guidelines for [miscellaneous venues](#) and [outdoor spectator events](#) when planning for in-person convenings.
- Seniors who are graduating or moving up do not count in your event capacity restrictions.
- K–12 schools should consider multiple, smaller events that do not overlap if capacity requirements are a limitation.

Find the complete and official DOH guidance [here](#).

INFORMATION AND ASSISTANCE

The OSPI TTY number is 360-664-3631. Previous guidance and additional information related to COVID-19 and school closures is available on the [COVID-19 page](#) of the OSPI website. This bulletin is also available on the [Bulletins page](#) of the OSPI website.

For questions about graduation requirements, please contact Kim Reykdal, Program Supervisor Lead for Secondary School Counseling, at 360-725-6168 or kim.reykdal@k12.wa.us.

For questions about graduation pathways, please email the graduation.pathways@k12.wa.us inbox.

For questions about dual credit, please contact Jason Boatwright, Program Supervisor for Dual Credit and Multiple Pathways, at 360-725-0436 or jason.boatwright@k12.wa.us.

For questions about CTE Course Equivalencies, please contact Lisa Fish, CTE Course Equivalency Project Coordinator, at 360-725-6239 or lisa.fish@k12.wa.us.

For questions regarding state assessments, please contact Deb Came, Assistant Superintendent of Assessment and Student Information, at 360-725-6336 or deb.came@k12.wa.us.

For questions regarding Special Education, please contact Glenna Gallo, Assistant Superintendent of Special Education, at 360-725-6075 or glenna.gallo@k12.wa.us.

For questions regarding supporting seniors' emotional well-being, please contact Tammy Bolen, Program Supervisor for Social Emotional Learning, at 360-725-6042 or tammy.bolen@k12.wa.us.

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