




TO: P-12 Education Committee
FROM: Ken Slentz 
SUBJECT: Proposed amendment of sections 100.5, 100.6 and 200.5 relating to a nondiploma exiting credential for students with disabilities
DATE: March 4, 2013

AUTHORIZATION(S):



SUMMARY

Issue for Discussion

Should the Board of Regents revise the proposed amendment of sections 100.5, 100.6, and 200.5 of the Regulations of the Commissioner of Education to establish a nondiploma exiting credential for students with disabilities?

Reason(s) for Consideration

Review of Policy

Proposed Handling

This issue will come before the P-12 Education Committee for discussion at the March 2013 meeting.

Procedural History

In December 2012, the Board discussed a proposed amendment to sections 100.5, 100.6, and 200.5 of the Regulations of the Commissioner of Education that would authorize school districts and nonpublic schools to award a credential to a student with a disability upon graduation that would recognize the student's preparation for entry level employment. A Notice of Proposed Rule Making was published in the State Register on December 26, 2012, for a 45-day public comment period. Supporting materials are available upon request from the Secretary to the Board of Regents.

Background Information

Over the past two years, the Regents have taken several actions to provide students with disabilities opportunities to exit high school with diplomas and other meaningful credentials that represent high standards based on the State's learning standards:

- Recognizing that the standards for a regular high school diploma in this State must be rigorous and represent readiness for employment or postsecondary education, the Board allowed the sunset of the Regents Competency Tests (RCT) option for a student with a disability to graduate with a local diploma, beginning with the entering cohort of September 2011.
- In October 2012, the Regents adopted new regulations to add a comparative option whereby students with disabilities could graduate with a local diploma. This option is in addition to safety net that a student with disability could graduate with a local diploma if he/she earns a 55-64 score on one or more of the required Regents examinations.
- In January 2012, the Regulations of the Commissioner were amended to repeal the IEP diploma and, effective July 1, 2013, to establish a Skills and Achievement Commencement Credential for students with severe disabilities who are eligible to take the New York State Alternate Assessment (NYSAA). This credential is not a regular high school diploma but rather a certificate of a student's achievement of the Career Development and Occupational Studies (CDOS) learning standards.
- At the August 2012 meeting, the Regents discussed the need for development of an additional graduation certificate, as a replacement to the IEP diploma, for other students with disabilities who, because of their disability, are unable to earn a regular diploma.

At the December 2012 Regents meeting, proposed regulations were discussed to establish a certificate that could be earned by students with disabilities, other than those with severe disabilities, and awarded upon graduation. The proposed amendment was developed consistent with the guiding principles established by the Regents that: (1) in addition to academic preparation, students need to be able to demonstrate knowledge and skills relating to career development, integrated learning and universal foundation skills essential for success in the workplace (Career Development and Occupational Studies (CDOS) Learning Standards); (2) students need to be actively engaged in career planning and preparation and their participation in career awareness, exploration and preparation activities should be valued, encouraged and recognized; and (3) students should participate in meaningful career development opportunities that are developmentally and individually appropriate, in consideration of the students' strengths, preferences and interests and that provide real world work experiences.

Under the proposed amendment, a certificate denoting entry-level work readiness could be awarded to a student with a disability as a supplement to a regular

high school diploma or, for a student with a disability who is unable to earn a regular diploma because of his/her disability, as the student's exiting credential. The credential would not be considered a regular high school diploma in accordance with State standards or for federal accountability purposes, and a student with a disability who exited school with this credential would continue to be eligible for a free appropriate public education until the end of the school year in which the student turns age 21 or until the receipt of a regular high school diploma, whichever shall occur first.

To award the credential, the school must have documentation that: (1) the student has developed, annually reviewed and as appropriate revised a career plan, which is a student-developed plan that documents his/her self-identified career interests, career-related strengths and needs; career goals and coursework and work-based learning experiences the student plans to engage in to achieve those goals; (2) the student has demonstrated knowledge and skills relating to the CDOS learning standards as evidenced by successful completion at the secondary level of not less than the equivalent of two units of study¹ in career related courses and/or work-based learning experiences. Hours of work-based learning experiences may, but would not be required to, be completed in conjunction with career and technical courses; and (3) the district has an employability profile on the student which documents the student's attainment of the CDOS learning standards, including career development, integrated learning and universal foundation skills and work related skills and experiences.

Summary of Public Comment:

A Notice of Proposed Rule Making was published in the State Register on December 26, 2012. Public comment on the proposed amendment was accepted for 45 days from the date of publication in the State Register. In addition, Department staff met with nine advisory groups. These groups included the State Rehabilitation Council; Commissioner's Advisory Panel for Special Education Services; Developmental Disabilities Advisory Council Subcommittee on Special Education; New York State Parent Centers; Regional Special Education Technical Assistance Support Centers Transition Specialists; Adult Career and Continuing Education Services (ACCES) vocational rehabilitation and Independent Living Centers (ILC) staff and providers; employers, including representatives from the New York State (NYS) Department of Labor; students and former students with disabilities; and the external advisory workgroup established to guide development of the credential.

In addition to comments received through the nine advisory groups, 123 written comments were received. There was mixed support for the proposed regulations. Although there was significant support for a credential recognizing a student's preparation for employment and acknowledgement of career related skills and experiences, there were also many expressing concerns and providing recommendations for changes to the proposed rule.

- The majority of the individuals involved in the nine advisory workgroups indicated that the proposal would validate the importance of career planning, work readiness activities and transition planning and services; assist students

¹ One unit of study is equivalent to 108 hours.

in becoming knowledgeable about themselves and the requirements of the world of work; foster positive self-esteem and keep students engaged in learning and in school; and recognize the accomplishments of students while preparing them for employment. Similar comments were received in writing from two organizations and 21 individuals.

- The most frequently occurring recommendation, as provided in discussion with the nine advisory groups and through written comments received by eight organizations and 40 individuals, was that this certificate be available to all students, not just students with disabilities; that a certificate available only to students with disabilities might be less valued by employers; that it might lead to the disclosure that the individual has a disability; and that a certificate of a work readiness skills would have essential value for all students, not just those who are disabled. Additionally, some described the proposed certificate as stigmatizing and discriminatory, and a violation of a student's civil rights as it automatically identifies a student as having a disability.
- The next most frequently occurring comment was that the certificate should be replaced with an alternative diploma option. In addition to hearing this recommendation from the nine advisory groups, 39 written comments (nine organizations and 30 individuals) specifically advocated for multiple pathways to a diploma in lieu of this credential.
- Recommendations to revise the title of the certificate were received from four of the advisory groups and in written comment from four professional and advocacy organizations and seven individuals. These comments indicated that use of the term "Regents" could lead a parent and a student to believe the credential is equivalent to a regular high school diploma based on Regents examinations because "Regents" is a term most often linked to State examinations, rather than the State Education Department's policy making Board. Others, including representatives from the New York State Department of Labor (NYSDOL), expressed concern that a "certificate of work readiness" might be confused with some of the national "work readiness" credentials that establish different requirements for award, including passing an assessment.
- Written comment provided by eleven individuals as well as one organization representing special education administrators, indicated that implementation of the proposed credential would be "manageable" for districts as it sets forth minimum requirements, allows for flexibility in design and delivery, and provides a framework to identify appropriate work preparation experiences. However, further Department guidance and professional development would be needed to assist schools to implement the certificate.
- Twelve comments (from four advisory groups, three advocacy agencies and organizations and five individuals) expressed concern that the requirement for career development courses and work-based learning activities could conflict with providing students with access to the general curriculum to earn a regular diploma, leading students to be "tracked" for the certificate.

- Eight groups and individuals recommended that the specific skills and proficiency levels expected of students be more clearly defined and the mechanisms for measurement more objective. One recommendation was that the Department should consider allowing students who earn one of the national work readiness credentials to have met the requirements for this certificate.
- Eight groups and individuals recommended that regulations more directly link the proposed instructional and work-based learning experiences to transition planning and services in a student's individualized education program (IEP).

Department Response to Public Comment

To address public comment concerns and recommendations, revisions are suggested to the proposed amendment as indicated below. Attachment 1 provides draft revised express terms for your review and consideration.

1. Change the title to "Certificate of Career Development and Occupational Studies" and add that the certificate awarded to the student must indicate that it has been endorsed by the New York State Board of Regents as a certificate of readiness for entry-level employment.
2. Add that the district or nonpublic school must have evidence that the student demonstrated knowledge and skills related to the CDOS learning standards in the areas of career development; integrated learning and the universal foundation skills at the commencement level.
3. Clarify the career and technical education course(s) includes specialized and integrated courses that are either approved by the local board of education or by the Department.
4. Add specificity on the documentation that must be included in a student's employability profile.
5. Add that, in lieu of the required career development and work-based learning experiences, the certificate could be awarded to a student with a disability who has earned one of the four national work readiness credentials (see Attachment 2). (One of the national certificates - The Work Readiness Credential - is endorsed by the NYS Department of Labor. To earn this credential, individuals must successfully complete a web-based assessment, available at 213 sites in 23 states.)
6. Require that the student's preferences and interests as identified in the student's career plan be considered in the development of the transition components of the student's IEP.
7. Add that a school district that awards this certificate to more than 20 percent of the students with disabilities in the cohort, where such certificate is not a

supplement to a regular high school diploma, shall be required as deemed necessary by the Department (e.g., based on a monitoring review) to use a portion of its Part B Individuals with Disabilities Education Act grant funds for targeted activities as necessary to ensure that students with disabilities have appropriate access to participate and progress in the general curriculum necessary to earn a regular high school diploma.

While many expressed concern that NYS is proposing award of a certificate only to students with disabilities, the practice of offering a certificate and/or diploma specific to students with disabilities is consistent with other states. The 2011 National Center on Educational Outcomes (NCEO) report provides the following information:

- Eight states (Alabama, Connecticut, Florida, Georgia, Mississippi, Nevada, Virginia and West Virginia) and the District of Columbia provide a diploma option specific to students with disabilities.
- Alabama, Florida and Mississippi offer an occupational diploma specifically for students with disabilities.
- Six states (Alaska, Delaware, Kansas, Kentucky, Louisiana, and Wyoming) provide a certificate of achievement specific to students with disabilities.
- Eight states (Alaska, Arkansas, Florida, Hawaii, Illinois, Kansas, Mississippi, and Wyoming) provide a certificate of attendance specific to students with disabilities.

Attachment 3 provides additional information regarding these and other options available in other states.

Staff recommends that the proposed limitation of this certificate to only students with disabilities be revisited after such time as the Regents finalize policy on multiple pathways to a diploma.

Timetable for Implementation

It is recommended the proposed amendment be revised and submitted for approval on an emergency basis at the April 2013 Board Meeting with an effective date of April 23, 2013. A Notice of Revised Rule Making would be published in the State Register on March 27, 2013 for a 30-day public comment period. It is anticipated that the revised proposed amendment will be presented for adoption as a permanent rule at the May Regents meeting. This timetable would ensure that the certificate is in place with the June 30, 2013 repeal of individualized education program (IEP) diploma.

AMENDMENT OF THE REGULATIONS OF THE COMMISSIONER OF EDUCATION

Pursuant to Education Law sections 101, 207, 208, 305, 4402 and 4403

1. Subparagraph (i) of paragraph (7) of subdivision (b) of section 100.5 of the Regulations of the Commissioner of Education is amended, effective April 23, 2013, as follows:

(i) Except as provided in subparagraphs (vi), (vii), (viii) and (xi) of this paragraph, and paragraph (d)(7) of this section, for students first entering grade nine in the 2001-2002 school year and thereafter, there shall be no diplomas [or], certificates, or credentials other than the following:

(a) Regents diploma;

(b) Regents diploma with an advanced designation;

(c) State high school equivalency diploma as provided in section 100.7 of this Part;

(d) High School Individualized Education Program Diploma as provided in section 100.9 of this Part; [or]

(e) Regents diploma, or Regents diploma with an advanced designation, with an affixed technical endorsement awarded upon completion of an approved career and technical education program pursuant to paragraph (d)(6) of this section;

(f) Skills and achievement commencement credential as provided in section 100.6(a) of this Part; or

(g) Certificate of career development and occupational studies as provided in section 100.6(b) of this Part.

2. Section 100.6 of the Regulations of the Commissioner of Education is amended, effective April 23, 2013, as follows:

§100.6 High school exiting credentials.

(a) Skills and achievement commencement credential. Beginning with the 2013-14 school year and thereafter, the board of education or trustees of a school district shall, and the principal of a nonpublic school may, issue a skills and achievement commencement credential to a student who has taken the State assessment for students with severe disabilities, as defined in section 100.1(t)(2)(iv) of this Part, in accordance with the following provisions:

[(a)] (1) Prior to awarding the skills and achievement commencement credential, the governing body of the school district or nonpublic school shall ensure that:

[(1)] (i) . . .

[(2)] (ii) . . .

[(3)] (iii) . . .

[(b)] (2) . . .

[(c)] (3) . . .

[(d)] (4) The credential shall be issued together with a summary of the student's academic achievement and functional performance, as required pursuant to section 200.4(c)(4) of this Title, that includes documentation of:

[(1)] (i) . . .

[(2)] (ii) . . .

[(3)] (iii) . . .

School districts may use the State model form developed by the commissioner for the summary of academic and functional performance or a locally-developed form that meets the requirements of this subdivision.

(b) Certificate of career development and occupational studies. Beginning July 1, 2013 and thereafter, the board of education or trustees of a school district shall, and the

principal of a nonpublic school may, issue a certificate of career development and occupational studies to a student with a disability who meets the requirements of paragraph (1) of this subdivision to document preparation for entry-level employment after high school, except for those students deemed eligible for a skills and achievement commencement credential pursuant to subdivision (a) of this section. Consistent with sections 100.2(q)(1) and 100.5 of this Part, the school district or nonpublic school shall ensure that the student has been provided with appropriate opportunities to earn a Regents or local high school diploma, including providing a student with meaningful access to participate and progress in the general curriculum to assist the student to meet the State's learning standards.

(1) Except as provided in paragraphs (2), (5) and (6) of this subdivision, prior to awarding the certificate of career development and occupational Studies, the board of education or trustees of the school district, or the governing body of the nonpublic school, shall ensure that each of the following requirements have been met:

(i) the school district has evidence that the student has developed, annually reviewed and, as appropriate, revised a career plan to ensure the student is actively engaged in career exploration. Such plan shall include, but is not limited to, a statement of the student's self-identified career interests; career-related strengths and needs; career goals; and career and technical coursework and work-based learning experiences that the student plans to engage in to achieve those goals. School districts shall provide students with either a model form developed by the commissioner to document a student's career plan, or a locally-developed form that meets the requirements of this subdivision and, as appropriate, shall assist the student to develop his/her career plan. The student's career plan may not be limited to career-related activities provided by the school and may include activities to be provided by an entity other than the school;

provided that nothing in this subdivision shall be deemed to require the school to provide the student with the specific activities identified in the career plan. A student's preferences and interests as identified in his/her career plan shall be reviewed annually and considered in the development of the student's individualized education program pursuant to section 200.4(d)(2)(ix) of this Title. A copy of the student's career plan in effect during the school year in which the student exits high school shall be maintained in the student's permanent record;

(ii) the school district has evidence that the student has demonstrated commencement level knowledge and skills relating to the career development and occupational studies learning standards set forth in section 100.1(t)(1)(vii)(a), (b) and (c) of this Part, including but not limited to career development, integrated learning and the universal foundation skills; and the student has successfully completed in grades 9-12 not less than the equivalent of two units of study in career and technical education course(s) and/or work-based learning experiences. The equivalent units of study shall be earned through coursework in career and technical education and/or work-based learning experiences, provided that the equivalent units of study shall include a minimum of 54 hours of documented school supervised work-based learning experiences related to career awareness, exploration and/or preparation which may, but are not required to, be completed in conjunction with the student's career and technical education course(s). For purposes of this subdivision: (1) career and technical education course(s) means a grade 9 -12 course or courses in career and technical education, as defined in section 100.1(l) of this Part, that consists of specialized and integrated courses that are approved by the local board of education or by the Department pursuant to section 100.5(d)(6)(iv); and (2) work-based learning experiences include, but are not limited to, job shadowing, community service, volunteering, service learning, senior project(s)

and/or school based enterprise(s), which shall be provided, consistent with Department guidelines, under the supervision of the district and documented in the student's transcript; and

(iii) Within one year prior to a student's exit from high school, at least one work skills employability profile for the student has been completed by designated school staff or other individuals knowledgeable about the student's employability skills and experiences that identifies the student's attainment of each of the commencement level career development and occupational studies learning standards set forth in section 100.1(t)(1)(vii)(a), (b) and (c) of this Part including, but not limited to career development; integrated learning; and universal foundation skills and, as appropriate, documents the student's attainment of technical knowledge and work-related skills, work experiences, performance on industry-based assessments and other work-related and academic achievements. School districts may use a model form developed by the commissioner to document a student's work skills employability profile, or a locally-developed form that meets the requirements of this subdivision. A copy of the student's work skills employability profile(s) shall be maintained in the student's permanent record.

(2) Notwithstanding the provisions of paragraph (1) of this subdivision, a board of education or trustees of the school district, or the governing body of the nonpublic school, may award the certificate of career development and occupational studies to a student who has met the requirements for a nationally-recognized work-readiness credential, including but not limited to SkillsUSA, the National Work Readiness Credential, the National Career Readiness Certificate – (ACT) WorkKeys and the Comprehensive Adult Student Assessment Systems Workforce Skills Certification System.

(3) The certificate shall be issued at the same time the student receives his/her Regents or local high school diploma or, for a student whose disability prevents the student from earning a Regents or local diploma, any time after such student has attended school for at least 12 years, excluding kindergarten, or has received a substantially equivalent education elsewhere, or at the end of the school year in which a student attains the age of 21.

(4) The certificate awarded shall be similar in form to the diploma issued by the school district or nonpublic school, except that it shall not use the term "diploma" and shall indicate that it has been endorsed by the New York State Board of Regents as a certificate of readiness for entry-level employment. Award of the certificate shall be documented in the student's transcript.

(5) For students with disabilities who exit from high school prior to July 1, 2015, the district or nonpublic school may award the certificate of career development and occupational studies to a student who has not met all of the requirements in subparagraph (ii) of paragraph (1) of this subdivision, provided that the school principal, in consultation with relevant faculty, has determined that the student has otherwise demonstrated knowledge and skills relating to the commencement level career development occupational studies learning standards.

(6) For students with disabilities who transfer from another school district within the State or another state, the principal shall, after consultation with relevant faculty, evaluate the work-based learning experiences and coursework on the student's transcript or other records to determine if the student meets the requirements in subparagraph (ii) of paragraph (1) of this subdivision.

(7) A school district that awards this certificate to more than twenty percent of the students with disabilities in the cohort, where such certificate is not a supplement to a

regular high school diploma, shall be required to use a portion of its Part B Individuals with Disabilities Education Act grant funds for targeted activities as deemed necessary by the Department to ensure that students with disabilities have appropriate access to participate and progress in the general education curriculum necessary to earn a regular high school diploma.

[(e)] (c) If the student receiving a credential pursuant to subdivision (a) or (b) of this section is less than 21 years of age, such credential shall be accompanied by a written statement of assurance that the student named as its recipient shall continue to be eligible to attend the public schools of the school district in which the student resides without the payment of tuition until the student has earned a [regular] Regents or local high school diploma or until the end of the school year in which such student turns age 21, whichever shall occur first.

3. Subparagraph (iii) of paragraph (5) of subdivision (a) of section 200.5 of the Regulations of the Commissioner of Education is amended, effective April 23, 2013, as follows:

(iii) Prior to the student's graduation with an individualized education program (IEP) diploma or, beginning with the 2013-14 school year, prior to a student's exit with a skills and achievement commencement credential or a certificate of career development and occupational studies as set forth in section 100.6 of this Title, such prior written notice must indicate that the student continues to be eligible for a free appropriate public education until the end of the school year in which the student turns age 21 or until the receipt of a [regular] Regents or local high school diploma.

Attachment 2

NATIONAL SKILLS CREDENTIALS				
Specific Information	SkillsUSA	National Work Readiness Credential (NWRC)	National Career Readiness Certificate (NCRC) - WorkKeys (ACT)	Comprehensive Adult Student Assessment Systems (CASAS) - Workforce Skills Certificate System (WSCS)
Skills Assessed (including but not limited to)	<p>Focuses primarily on industry- specific abilities and personal qualities.</p> <p>Includes assessment of general employability skills.</p>	<p>General employability skills including nine communication, interpersonal, problem-solving and learning skills.</p>	<p>General employability skills such as reading for information, applied mathematics, listening for understanding, applied technology and soft skills. Includes 4 performance levels (bronze, silver, gold and platinum).</p>	<p>CASAS measures basic academic skills, critical thinking and problem solving. Includes continuum of skill levels, including skill descriptors for individuals with intellectual disabilities. WSCS, a supplemental credential to CASAS, assesses general employability skills.</p>
Career Specific	Yes	No	No	No
Curriculum/Instructional Materials	Yes. Blueprint of competencies for each career area.	Yes. Three book series designed to model authentic, work-related experiences and activities.	Yes. Interactive learning tool for career readiness skills.	No single curriculum. Provides an extensive data base of instructional training materials including low level literacy curriculum modules and lesson plans in alternative formats.
Test Administration	Testing occurs online and can be administered at school.	Testing is internet based and delivered securely in wide range of authorized sites.	Individuals can be certified as administrators and schools can become certified test sites.	Testing is available online and in paper and pencil formats. Schools can administer assessments.
Fee for Test/Materials	Yes	Yes	Yes	Yes
Accommodations for Individuals with Disabilities	Yes	Yes	Yes	Yes
Reading/Math Levels	Reading - 8 th grade Math - 6 th through 8 th grades (depending on career assessment).	Reading – 7 th - 8 th grade Math - 7 th - 8 th grade	Varies by performance level. Reading – 8 th grade through high school (HS) Math - 5 th grade through HS	Varies by performance level. Includes preliteracy and adult low level literacy skills. Reading and math level is comparable to GED® test for CASAS certification.
States/districts using Credential	Approximately 44 states. Some districts in NYS use these assessments through the Career and Technical Education program approval process.	Credential was developed in partnership with five states (Florida, New Jersey, NY, Rhode Island, and Washington), the District of Columbia and JA Worldwide. NYS Department of Labor endorses credential.	Five states have funded WorkKeys and 12 have funded the EXPLORE program for middle school students. Used by Center for Workforce Education and Development at Syracuse University and some BOCES adult education programs.	CASAS is affiliated with National External Diploma Program (NEDP) which provides unique ways for adults to earn HS diploma based on life experiences. Eleven states, including NY use NEDP. NEDP is used by 18 BOCES adult education programs. California is primary user of WSCS.
For additional information	http://www.workforcereadysystem.org	http://www.workreadiness.com	http://www.act.org/certificate	https://www.casas.org

Attachment 3

The following includes information regarding credential and diploma options specific to students with disabilities in other states as well as information regarding work readiness credentials offered in other states.

- Alaska and Louisiana provide a certificate only to students with severe disabilities taking alternate assessments. Louisiana also allows other students with disabilities to graduate with a diploma provided they pass a reduced number of end of course assessments.
- Wyoming and Nebraska provide a certificate to students with disabilities not able to meet the state standards. Kentucky provided such a certificate at the time of the National Center on Educational Outcomes (NCEO) report, however beginning in 2013, such students are provided an alternative course of study, as determined by the local board of education and an alternative diploma.
- In Kansas and Iowa, graduation requirements are established by the district with the district having the authority to determine if a student with a disability is awarded a diploma or a certificate.
- Delaware provides options for a certificate of completion based on attainment of individualized education program (IEP) goals and a modified diploma for students with disabilities not meeting high school course graduation requirements.
- California provides districts the option of awarding a certificate of achievement to students with disabilities unable to meet state and local graduation requirements. Students with disabilities, exempt from taking the California High School Exit Examination, earn a diploma by completing state and local course and credit requirements.
- In 2013-14, Rhode Island will pilot a work skills certificate for students with severe disabilities similar to New York's Skills and Achievement Commencement Credential. They are in the process of researching the national work readiness credentials as an option for other students with disabilities.
- Virginia uses of WorkKeys (ACT), a national work readiness credential, as a measure of literacy and numeracy for students with disabilities.
- North Carolina provides an occupational course of study for students with disabilities as a diploma option based on a minimum a number of credits in specific subject areas, six credits in occupational preparation education, 300 hours of school-based training, 240 hours of community-based training, and 360 hours of paid employment; four vocational education elective credits; a career portfolio; and completion of the student's IEP objectives. North Carolina offers a graduation certificate for students with disabilities unable to

complete the requirements of the occupational course of study. Students who complete the four-course Career and Technical Education sequence are administered the WorkKeys examination in twelfth grade.

- To obtain a diploma, all students in Oregon must demonstrate proficiency in the Essential Skills (those determined necessary for success in college, employment and civic life). WorkKeys (ACT) is one of several options for demonstrating proficiency of essential skills. Students with disabilities may be exempt from the approved assessment requirements (including WorkKeys ACT), and graduate with a modified diploma or a certificate, as determined by the district.
- Texas issues a Certificate of High School Equivalency for any student earning a General Educational Development (GED) Diploma. Students with disabilities in Texas graduate with a diploma if they complete their IEP, district or State (whichever is higher) standards and credit requirements and either demonstrate mastery of employability skills, or are employed full time or have accessed adult services.
- Wisconsin offers an Employability Skills Certificate for all students. Requirements include completion of 90 hours of work-based learning and proficiency in personal work habits and attitudes as documented on an employability profile.