

Graduation Requirements in Light of Coronavirus-Related School-Building Closure

BACKGROUND AND CURRENT STATUS

On March 12, 2020, Governor Mike DeWine announced that all of Ohio's public, community and private K-12 school buildings would be closed to students for an initial three-week period—beginning at 12:01 a.m. on March 17 and ending at 11:59 p.m. on April 6, 2020—due to the ongoing coronavirus (COVID-19) health crisis. This action was taken to slow the spread of the coronavirus disease. On March 30, at his daily press conference about the coronavirus, the Governor extended the school-building closure through May 1, 2020.

In light of the ordered school-building closure, Ohio's education community continues to work to ensure students can reasonably graduate at the end of the 2019-2020 school year. During these unprecedented times, it is necessary to provide flexibility in meeting graduation requirements.

It is important to ensure the thousands of graduation-ready students are able to receive diplomas and successfully transition to college, the workforce, the military or self-sustaining vocations. This document is designed to help inform school and district decisions on whether eligible students have met the requirements under the temporary local flexibility granted through recently enacted Ohio law¹ due to the current public health crisis.

AWARDING DIPLOMAS WITH GRADUATION FLEXIBILITY

STEP 1: DETERMINE A STUDENT'S ELIGIBILITY

Students are eligible for local graduation flexibility, but not necessarily entitled to graduate, through Sept. 30, 2020, if they meet the following conditions:

- Students were either
 1. Enrolled in 12th grade in the 2019-2020 school year; OR
 2. On track to graduate in 2019-2020 (as determined by the school district or school) regardless of the graduation cohort in which the student is included

AND

- Had not completed the requirements for a high school diploma.

The category “on track to graduate in 2019-2020” includes students outside of the 2020 graduation cohort, such as students from the class of 2019 or earlier who have not yet met graduation requirements or students in the class of 2021 who have not yet graduated but are determined by the district or school to have been on track to graduate in the 2019-2020 school year. The determination of whether a student not enrolled in the 12th grade is “on track to graduate” is determined locally.

Students who already met their graduation requirements at the time of the ordered school-building closure clearly qualify to graduate and do not require the flexibility specified in House Bill 197.

STEP 2: DETERMINE IF THE STUDENT HAS SUCCESSFULLY COMPLETED THE CURRICULUM

To reflect the change in circumstances during the ordered school-building closure that may limit the ability to complete classes, conduct assessments and access certain graduation pathways (for example, earning an industry-recognized credential, completing a work or community service experience), Governor DeWine and the Ohio General Assembly have given flexibility² to schools and districts **to award diplomas to students who have successfully completed the [curriculum requirements](#) while forgoing all other additional requirements for a diploma. Additional components for a diploma that are no longer requirements for students given this flexibility include assessment requirements and any alternative pathways to graduation.** This window of flexibility granted to school districts and graduating students extends through **Sept. 30, 2020.**

It is up to a student’s principal, in consultation with teachers and counselors, to determine whether eligible students have successfully met the curriculum requirements or if the individualized education program team has determined the student has met the individualized education program.

For purposes of this graduation flexibility, there are four categories of students:

1. A student planning to meet the normal curriculum requirements for the student’s assigned graduation cohort;
2. A student whose individualized education program team has determined he or she will meet curriculum requirements under Ohio Revised Code 3313.61(A);
3. A student who is using [Ohio Curriculum Choices](#) pursuant to Ohio Revised Code section 3313.603(D);
4. A student enrolled in a dropout prevention and recovery program that is appropriately authorized by the Department through having been granted a waiver pursuant to Revised Code section 3313.603(F).

To determine if a student has successfully completed the curriculum, principals, in consultation with teachers and counselors, should:

A. Review the student's progress.

The following questions can guide the review process:

- What was the student's status at end of the 11th grade year in terms of credit accumulation?
- What courses was the student enrolled in during the 12th grade year? Did the student complete any courses or earn any credits by the end of the first semester?
- For courses not yet completed, what progress had the student made in those courses through the time of the beginning of the ordered school-building closure?
- What additional progress did the student make during the school or district's good faith effort to provide education services during the ordered school-building closure period?

B. Determine whether a student has completed each course; assign grades.

Before a determination can be made about whether a student has successfully completed the curriculum requirements, a determination will need to be made for each course in which the student is enrolled. Schools and districts will need to award credit to students who meet the curriculum requirements for their necessary courses to award them diplomas. Due to the varied nature of instruction during Ohio's ordered school-building closure, schools and districts have discretion in awarding credit. Schools should ensure fair and consistent practices when making decisions on awarding credit. It is strongly suggested that schools and districts document the criteria used to make credit award determinations.

Schools and districts should consider student progress toward meeting current course requirements when deciding to award credit. Schools are encouraged to continue learning activities and provide feedback to students, recognizing the processes for awarding credit may not be wholly different from their previous processes.

When determining whether to grant credit to students impacted by the ordered school-building closure, it may be helpful for schools and districts to consider the following:

Considerations for determining course completions

Principals should rely significantly on teachers to determine whether a student has completed a course. Teachers may consider all factors normally included in determining whether a student completes a course. This consideration can include student activities and performance both before and after the ordered school-building closure. Such factors as student attendance, completion of assignments, course test scores, student participation, engagement in remote learning activities and other factors can contribute to the decision to award credit.

Examples (for illustration purposes only):

- A student had a C average in Senior English up until the time the school-building closed. During the closure period, the student was diligent in completing assignments and otherwise continuing to participate in whatever educational services were offered. This student would likely be considered to have completed the course and would earn credit.

- A student was failing Senior English up until the time the school-building closed. During the closure period, the student made no effort to engage in assignments or otherwise continue to participate in education services offered. This student would be considered to have not completed the course and would not earn credit.
- A student had a C average in Senior English up until the time the school-building closed. During the closure period, the student was not engaged in work and participated minimally in educational services offered. This student's principal would need further consultation with teachers and counselors to determine whether to award credit.
- A student was failing Senior English up until the time the school-building closed. During the closure period, the student was diligent in completing assignments and showed a significant change in effort and quality of work. This student's principal would need further consultation with teachers and counselors to determine whether to award credit.

Credit flexibility

A student also may earn course credit through credit flexibility. [Credit flexibility](#) is Ohio's statewide plan to allow students to earn units of high school credit based on a demonstration of subject area competency instead of, or in combination with, completing hours of classroom instruction.

During the ordered school-building closure, credit flexibility continues to be an option for high school and seventh and eighth grade students to meet curriculum requirements to earn high school credit by demonstrating subject area competency. This demonstration may occur through the completion of traditional coursework, testing out or otherwise demonstrating mastery of course content through the pursuit of an approved educational option plan. For more information on credit flexibility, please visit the Ohio Department of Education's [Credit Flexibility webpage](#).

Schools and districts can consult the [EMIS Manual 4.2 Course Master Record](#) to review credit flexibility reporting procedures.

Course grades

Grading policy is strictly a local district or school decision in Ohio. The flexible graduation requirements for 2020 only depend on credit being earned for a course and not the grade earned by the student. Schools should be thoughtful in determining how grades will be assigned for courses considered to be completed as part of the graduation flexibility allowances.

Districts and schools should remember a student's grades and often a student's GPA factor into a number of student opportunities, including eligibility for NCAA athletic participation and college scholarship awards. Schools have the option of maintaining a traditional letter grade structure or shifting to a pass/fail approach. In some cases, schools may allow students a choice in terms of how grades are reflected and transcribed.

C. Determine whether a student has successfully completed the curriculum requirements.

For purposes of this determination, a principal working with teachers and counselors should be able to identify whether the student performed satisfactorily on the course curriculum as it was delivered during the entire school year. Once determinations are made for each course, the principal should make the determination as to whether the student accumulated the required number of course credits (see the discussion below regarding district-adopted curriculum requirements) to graduate. No other requirements that may otherwise have applied to the class of 2020 or earlier classes need to be met (such as test scores, capstone project, work or community service experience, industry-recognized credential, 11th and 12th grade GPA). After considering the totality of the student's education performance on a course-by-course basis, the principal should make the decision about whether the student graduates or not based on whether the student has successfully completed the curriculum.

Ohio Curriculum Choices: For a student who is using Ohio Curriculum Choices and has identified an alternative set of curriculum requirements, the determination should be made as to whether the student has met those requirements in a similar manner as described above.

Individualized Education Program: For a student with an individualized education program (IEP), it is important the student is held to the same local graduation flexibility expectations as his or her peers who do not have disabilities to the extent possible. As appropriate, per Ohio Revised Code 3313.61(A), an individualized education program team may determine that a student with disabilities who is eligible for graduation flexibility will graduate by successfully completing the individualized education program. The individualized education program team can use progress reports to determine and document if the student has met the goals outlined in the individualized education program based on the student's experience through the end of the 2019-2020 school year. This flexibility also applies to students who take the Alternate Assessment for Students with Significant Cognitive Disabilities.

Dropout Prevention and Recovery Program: For a student enrolled in a dropout prevention and recovery program that has been authorized by the Ohio Department of Education by virtue of having received a waiver issued by the Department pursuant to Revised Code section 3313.603(F), the determination should be made based on the student's successful completion of the competency-based instructional program. School administrators should review a student's progress toward completing the program, in consultation with teachers and counselors, and make a determination as to whether a student has completed the requirements outlined in the program.

D. Document decisions and reasoning.

Schools should maintain documentation of decisions made regarding each student's graduation status when using the temporary flexibility provided by HB 197. It may be helpful for these records to include:

- Decisions made and narrative justification;
- Student records from his or her entire high-school career;
- Evidence of participation in education opportunities offered during the ordered school-building closure.

Schools and districts will not be required to share documentation with the Ohio Department of Education, but a consistent documentation process will be helpful for record keeping and to ensure decisions made are as fair and consistent as possible.

The state is relying on the professionalism, fairness and reasonable judgment of principals and educators in making determinations relative to the completion of curriculum for purposes of awarding diplomas.

ADDITIONAL INFORMATION

AUTHORITY TO MODIFY DISTRICT CURRICULUM REQUIREMENTS IN EXCESS OF STATE MINIMUM REQUIREMENTS

The temporary flexibility granted by HB 197 allows superintendents and chief administrators of schools and districts that have adopted a more challenging curriculum than the state minimum to use the state minimum curriculum requirements for eligible students. Ohio law requires students to earn a minimum of [20 credits](#) to be eligible to earn a diploma.

Many local schools and districts require a more challenging curriculum through the adoption of a resolution by the local school board or governing authority. These local policies can require students to earn more than the state-minimum of 20 credits. However, **superintendents and chief administrators of schools and districts who have adopted a more challenging curriculum than the state minimum may, under the provisions of HB 197, elect to require only the state minimum curriculum.**³ Superintendents and chief administrators who elect to exercise this authority should consult with their local boards of education or governing authorities. Action by the local board or governing authority is not required.

DURATION OF FLEXIBILITY

Diplomas may be awarded to eligible students with this flexibility through Sept. 30, 2020,⁴ after which students must meet the original requirements for a diploma applicable to their graduation cohorts.

CONTINUATION OF EDUCATIONAL OPPORTUNITIES

Districts and schools are strongly encouraged to continue providing ways to keep students actively engaged in learning opportunities during Ohio's ordered school-building closure and through the remainder of the school year. Such learning opportunities could make a difference for students as they work to complete curriculum requirements. Schools and districts should

make a good faith effort to provide learning opportunities based on their capabilities, while recognizing the realities of student circumstances. This should always occur in a manner consistent with good health practices and social distancing requirements.

To allow students to complete in-person instructional experiences that are requirements for a diploma or career-technical education program, schools and districts are encouraged to provide access to school facilities as soon as reasonably possible after access to school buildings is permissible. Access could be provided even if the last instructional day of the school year already has passed.

Additionally, schools are encouraged to offer opportunities to complete requirements for industry-recognized credentials as soon as it is deemed safe to reopen school buildings, even though students may already have been awarded a diploma.

Students using the temporary graduation flexibility who were pursuing additional requirements for a diploma (such as work or community experience, capstone projects, OhioMeansJobs Readiness Seal) are not required to complete these options but may wish to continue pursuing these opportunities. Whenever practicable, schools and districts should facilitate students completing those opportunities.

¹ Section 17(D), House Bill 197, 133rd General Assembly.

² Section 17(D)(2), House Bill 197, 133rd General Assembly.

³ Section 17(D)(3), House Bill 197, 133rd General Assembly.

⁴ Section 17(D)(2), House Bill 197, 133rd General Assembly.