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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

k12.wa.us

March 20, 2020

( ) Action Required  
(X) Informational

## BULLETIN NO. 022-20 EXECUTIVE SERVICES

TO: Educational Service District Superintendents  
School District Superintendents  
School District Business Managers  
School Principals  
Special Education Directors  
CTE Directors  
District Assessment Coordinators  
School Counselors

FROM: Chris Reykdal, Superintendent of Public Instruction

RE: Guidance for Long-term School Closures as of March 20, 2020

CONTACT: Contact Information is Located on Page 10

## PURPOSE AND BACKGROUND

To slow the spread of the novel coronavirus (COVID-19) in Washington, Governor Inslee announced on March 13 that all public and private K–12 school facilities in the state will be closed and prohibited from providing traditional in-person instructional activities through April 24.

As schools, families, and communities plan for closures, the Office of Superintendent of Public Instruction (OSPI) is committed to providing ongoing guidance and resources as we sort through this unprecedented situation together. This bulletin is part of a series of guidance since the Governor’s announcement of statewide school closures. Previous guidance is located on [OSPI’s COVID-19 webpage](#). Please note, if a topic is included in multiple rounds of guidance, the most current guidance will supersede prior guidance.

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

1. Meeting graduation requirements (pages 2–5)
2. Assessment options (page 6)
3. Dual credit (pages 6–8)
4. Special education services (pages 8–9)
5. Alternative learning settings (page 9)
6. Supporting seniors’ emotional well-being (page 9)

## MEETING CLASS OF 2020 GRADUATION REQUIREMENTS

This section includes guidance around credit requirements, High School and Beyond Plans (HSBP), graduation pathways, available waivers, and local graduation requirements. District and high school staff should prioritize meeting specific graduation requirement needs for seniors. As part of this school closure, high school seniors need reassurance that staff are working to ensure they graduate.

### Credit Requirements

Washington's high school diploma is based, in part, on completing a set number of high school credits. As a first step, district and school staff should determine which classes and credits seniors NEED to complete to meet credit requirements for graduation. This should include assessing the current class schedule for classes providing required senior-level credits (i.e., senior social studies, senior English), and courses meeting specific credit requirements that are serving a high number of seniors (such as third year math or science courses). This data can be sorted by number of seniors enrolled to prioritize coursework. Analysis should also include determining which classes and credits each senior needs to complete credit requirements for graduation. Schools should provide multiple options for seniors to demonstrate they have met standard across required content areas.

### Options to Support Meeting Credit Requirements

Options that can help seniors meet credit requirements include:

- Credit via work completion:
  - Examples include online coursework, written work packets, project-based learning, portfolios, High School and Beyond Plans, or work-based learning (where current high school course standards align with student's job).
- Credit via competency-based assessment(s):
  - Examples include formative and summative course content, online PSAT/SAT prep, spring dual credit, world language competency, industry recognized credential or certificate, college admissions/placement.
  - Find more information in Washington State School Directors' Association's (WSSDA) [Model Policy and Procedure 2409](#) and in the State Board of Education's [Competency-Based Crediting Handbook](#).
- Core credit through expanded course equivalency:
  - College courses completed through Running Start or career and technical education (CTE) courses may meet learning standards for core credits. Schools should consider local emergency approval of additional equivalencies between college courses or CTE courses that are aligned high school courses to ensure seniors earn core credits.

- Districts may adopt any of the [45 available state equivalency courses](#) or approve new local equivalencies in other academic areas.
- Two-for-one policy:
  - 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. See Washington Administrative Code [\(WAC\) 180-51-210\(g\)\(i\)](#) for additional information.
- Consider using “pass” or “no credit” transcript designations instead of letter grades.

### **Credit Waiver Options**

Districts have some flexibility in waiving credit requirements, which may be used to support seniors.

- Waiving non-core credits
  - State law allows districts to waive up to two of the “flexible” credits required for graduation for individual students based on “student circumstances” (see WAC 180-512-210 (13)).
  - Eligibility for this waiver is determined at the local level and is made in accordance with local policy adopted by the school board.
- Emergency waiver rulemaking
  - At the end of the 2020 Legislative Session, legislators granted the State Board of Education authority to administer an emergency waiver program to provide flexibility to districts to ensure students who were “on track to graduate before the gubernatorial declaration of emergency” are not negatively impacted by measures taken in response to the novel coronavirus (COVID-19). See House Bill 2965 Sec. 10 (2020).
  - The State Board of Education is currently creating a process to temporarily grant districts additional flexibility to waive the requirement of certain credits in order to graduate, provided students make a good faith effort. Additional rulemaking or guidance from the State Board will provide clarification on this at a later time.
  - Districts should continue making every effort to provide seniors with meaningful learning that enables them to earn the credits required to graduate.

### **High School & Beyond Plans (HSBP)**

School staff need to work with seniors to ensure they meet their [High School and Beyond Plan \(HSBP\) graduation requirement](#). School staff will determine locally if seniors have met this requirement.

Some seniors may need support with completing their HSBP, especially the new components recently required by House Bill 1599 (2019) for the Class of 2020, which include:

- Information on state and federal financial aid
  - OSPI's updated [Class of 2020 Graduation Pathways Toolkit](#) clarifies in detail what this new HSBP requirement entails.
  - The Washington Student Achievement Council's [12th Year Campaign website](#) has free resources and links to information that can be shared with seniors.
- Alignment between students' HSBP and Individualized Education Program (IEP) Transition Plan
  - School staff should collaborate to align seniors' IEP Transition Plans with the HSBP requirement using the suite of resources available on [OSPI's website](#).

For schools not yet using online platforms, access to HSBPs should be provided for seniors needing to complete required components. Schools should consider offering "office hours" when seniors can contact staff to get support with completing this graduation requirement. Staff can offer virtual assistance to individual seniors that comply with applicable social distancing directives and safety recommendations.

Please note, seniors earning an associate's degree through Running Start may still request to receive a high school diploma through the college, which removes the HSBP as one of their graduation requirements.

## Graduation Pathways

Class of 2020 seniors are expected to meet a new graduation pathways requirement, as passed in House Bill 1599 (2019). School staff should still assess which graduation pathway(s) seniors have met in alignment with their High School and Beyond Plans (HSBP). OSPI's [Class of 2020 Graduation Pathways Toolkit](#) can provide additional details to support making those determinations. Priority support should be given to seniors needing to complete specific coursework from this academic term to meet their chosen graduation pathway.

Through OSPI's Education Data System (EDS), school districts can access information about how their students in the Class of 2020 are meeting the graduation pathway requirements established in House Bill 1599 (2019). This application is designed to assist districts in knowing which students have achieved specific graduation pathways.

For students in the classes of 2019 and prior, OSPI's Graduation Database informs districts on which students earned a Certificate of Individual Achievement (CIA) or Certificate of Academic Achievement (CAA). The application has more details about which specific data are included.

Applications in EDS remain open for districts to submit pathway information as needed. For reporting purposes, OSPI will retrieve pathway data from CEDARS grade history record or data

sharing agreements when possible. For information or technical assistance, visit the [Graduation Pathways webpage](#) or email OSPI at [graduation.pathways@k12.wa.us](mailto:graduation.pathways@k12.wa.us).

### **Expedited Assessment Appeals (EAA) Waiver**

The graduation alternatives application remains open for districts to submit EAA Waivers for seniors who are unable to meet the graduation pathway requirement. As of March 20, no new changes to this process have been made.

### **Certificate of Individual Achievement (CIA) Options**

If specified in their IEP, seniors receiving special education services may still use the following CIA options to demonstrate readiness for their post-high school goals:

- CIA Cut Score on Regular (On-Grade) Assessment
- Locally Determined Assessments (LDA)
- Off-Grade Level Assessment on Regular or Alternate Assessment
  - The LDA is not a state assessment, as described in [Bulletin NO. 019-20](#), and therefore can be administered during and after school closures.
  - 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 9 of the Class of 2020 [Graduation Pathway Toolkit](#).

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

### **Local Graduation Requirements**

Considering the imperative to prioritize offering seniors learning opportunities so they can earn credits needed for graduation, OSPI encourages districts implementing additional locally determined graduation requirements to consider a temporary waiver for the Class of 2020.

For districts that choose to maintain local graduation requirements, OSPI encourages districts to allow alternatives if social distancing and safety measures cannot be maintained and to provide seniors sufficient support in completing these requirements.

For example:

- Video or other electronic submissions of Senior Project presentations.
- Within current safety and social distancing guidelines, organize community service opportunities that assist with food and classwork distribution, childcare needs, peer tutoring or providing assistance to at-risk individuals and families.

## ASSESSMENT OPTIONS

Per previous OSPI guidance in [Bulletin 019-20](#), the SBA will not be administered statewide for grades 3–8 nor 10, but high schools may consider giving the SBA to seniors (and/or juniors) within current social distancing and safety guidelines if the SBA is determined to be a viable graduation pathway for those students. As of March 20, OSPI plans to ensure the online test administration platform for the Smarter Balanced Assessments (SBA) will be open Monday, April 27 through Friday, June 5.

Following the statewide school closure, this year's limited testing window will allow districts to provide:

- An option for seniors (Class of 2020) to (re-)take the English language arts (ELA) and/or math SBA to meet a graduation pathway.
- An option for seniors (classes of 2017–19) to (re-)take the ELA and/or math SBA in order to earn a CAA or CIA, or access established graduation alternatives.
- An option for seniors wanting to take the ELA summative assessment for their Seal of Biliteracy.

School staff can access preliminary SBA scores within 7–10 days after administering the SBA to determine if seniors have met the graduation score.

## DUAL CREDIT

The long-term school closures will necessitate close collaboration between K–12 and higher education to support seniors engaged in dual credit opportunities. As our colleges move to distance learning models, it is critical to collaboratively establish procedures that ensure equitable access for all students and implement business models to ensure smooth running of these programs.

### Advanced Placement (AP), Cambridge International (CI), and International Baccalaureate (IB)

In alignment with their High School and Beyond Plan, students earning a C+ or higher each term on an approved ELA and/or math AP, CI, or IB course may choose to have that course satisfy their graduation pathway requirement. They do not need to take or pass the corresponding exam to use an AP, CI, or IB course as a graduation pathway.

For all three exam-based dual credit programs, if social distancing expectations are still in effect at testing time, schools should consider sticking with the original, longer-term testing schedules by proctoring exams to smaller groups of students, with priority given to seniors.

### **Advanced Placement (AP)**

The College Board is rolling out alternative testing options, with a plan to have more information published in the beginning of April. Districts should continue to work through their AP coordinator, and can keep track of options and opportunities for students on the [College Board's website](#).

Schools can provide continued AP learning opportunities by utilizing the free, daily online practices in AP Classroom. The College Board has developed a [one-page resource](#) on how to access these instructional supports.

Beginning in early April, free online video lessons developed by AP teachers will be available for the topics and skills typically taught in the final weeks of each AP course. Videos will be posted on the College Board's [AP YouTube channel](#).

### **Cambridge International (CI) and International Baccalaureate (IB)**

As of March 20, neither CI nor IB is planning to change established testing dates. Schools should consider utilizing available instructional supports to offer continued learning opportunities for students engaged in dual credit courses.

Staff can explore opportunities to keep seniors engaged in their dual credit courses at:

- IB's [guidance page](#) and [instructional supports](#) page.
- CI's [guidance page](#) and [instructional supports](#) page.

### **Running Start**

Running Start students may need more support than usual from their home high school as colleges transition to distance learning. Districts are encouraged to work directly with colleges, families, and community partners to provide assistance to any Running Start students who have barriers to engaging in distance learning, including technological, academic, or behavioral supports.

High schools should ensure that school counselors or other appropriate staff assist with their local colleges' spring quarter registration by processing Running Start Enrollment Verification Forms. Clear communication from school staff to seniors about how and when they can turn in and pick up signed forms, and with college partners to ensure they know the district's process, will be critical.

In addition, districts should determine how to continue applicable processes for monthly P-223 report development during school closures to ensure timely transfer of Running Start tuition payments to our college partners.

## College in the High School (CHS) and CTE Dual Credit

With colleges moving to a distance learning format, it may be possible for high school CHS and career and technical education (CTE) Dual Credit teachers to replicate similar learning opportunities for their high school students. Districts should consider reaching out to college staff in Student Support Services to explore giving CHS and CTE Dual Credit students temporary access to the college's digital platform.

OSPI acknowledges that converting in-person courses to a digital platform and providing equitable access to students can be a big lift. Prioritizing courses that seniors need to complete in high volumes in order to graduate can narrow the number of courses being considered for distance learning.

The National Alliance of Concurrent Enrollment Partnerships (NACEP) created a [guidance and resources page](#) that includes multiple examples of how to offer distance learning, as well as practices to avoid.

## SPECIAL EDUCATION SERVICES

### 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 comparable content coursework, as identified in the IEP Transition Plan Course of Study and aligned to the student's High School and Beyond Plan (HSBP) ([WAC 180-51-115](#)).

To learn more about comparable course substitution, see page 8 of the [February 2020 Special Education Monthly Update](#).

### Continuation of Special Education Services

As districts develop coursework options for seniors, there should be consideration for provision of services and supports included in student IEPs. Districts are encouraged to communicate with students and families regarding the potential need for flexibility and adjustments to ensure that health and safety requirements are satisfied, while also continuing to provide specially designed instruction to the extent possible. This will necessitate coordination of staff involved in delivery of instruction.

If the IEP team determines and documents 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. In addition, 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.



## 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: Each student must be provided with a Summary of Performance ([WAC 392-172A-03030](#)), and OSPI has created a [model Summary of Performance form](#). The Center for Change in Transition Services webpage has [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\(2b\)](#)).

## Support for Virtual Learning

OSPI's Special Education team is currently working on compiling a list of resources to support students with an IEP while participating in virtual learning environments. This will be posted at the [Inclusionary Practices Professional Development Project webpage](#) when available.

School districts will determine at a local level how services will be made available, taking into consideration the needs of students receiving special education services. Free technical assistance from the U.S. Department of Education Office of Civil Rights (OCR) web access team is available for questions regarding web platform selection and development for student learning, and to ensure compliance with the civil rights laws that OCR enforces. Districts should contact [OCRWebAccessTA@ed.gov](mailto:OCRWebAccessTA@ed.gov) for technical assistance. A few other resources include an OCR Short Webinar on [Online Education and Website Accessibility](#) and a fact sheet on [Addressing the Risk of COVID-19 in Schools While Protecting the Civil Rights of Students](#).

## 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 and schools should build upon the flexibility inherent in their unique alternative model to meet the needs of seniors. OSPI will soon publish additional guidance to support Open Doors and Alternative Learning Experience settings.

## SUPPORTING SENIORS' EMOTIONAL WELL-BEING

Many seniors and their families feel they have "lost" some of the best parts of their senior year, and many end-of-year senior traditions and rites of passage remain in question. School support staff should explore offering "virtual" student support services, especially as a systemic way to stay connected with youth of concern.

Some of the relevant resources to help with the design and implementation of a virtual support system include, but are not limited to:

- American School Counselor Association's [guidelines](#), [position statement](#), and [webinar](#) related to providing virtual school counseling support services.

- National Institute on Mental Health's [child and teen coping strategies](#) for reducing stress related to traumatic events.
- [Guidelines](#) developed by the National Association of School Nurses and National Association of School Psychologists on how to talk with students about COVID-19.

Depending on seniors' needs, some additional trauma-informed and social-emotional supports schools may want to consider providing include:

- Offering supervised/staffed digital forums for seniors to connect, manage stress and anxiety, share positives, and acknowledge the challenges they are dealing with.
- Inviting seniors to suggest ideas on how to connect or implement new/different rituals to mirror senior year traditions that may not be possible while current social distancing and safety measures are in place.
- Regularly updating students and families on where basic needs can be met or where supports are located in the community (food, housing support, financial support, etc.).
- Reassuring seniors that colleges nationwide are being asked to provide flexibility with final admission selections, including completion of specific course requirements, and increase support for this year's seniors' transition into higher education.

## 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 [OSPI's COVID-19 webpage](#). 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 School Counseling, at 360-725-6168 or [kim.reykdal@k12.wa.us](mailto:kim.reykdal@k12.wa.us).

For questions about graduation pathways, please email [graduation.pathways@k12.wa.us](mailto:graduation.pathways@k12.wa.us).

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](mailto: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](mailto:lisa.fish@k12.wa.us).

For questions about assessments, please contact Deb Came, Assistant Superintendent of Assessment and Student Information, at 360-725-6336 or [deb.came@k12.wa.us](mailto:deb.came@k12.wa.us).

For questions about special education, please contact Glenna Gallo, Assistant Superintendent of Special Education, at 360-725-6075 or [glenna.gallo@k12.wa.us](mailto:glenna.gallo@k12.wa.us).

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For questions about supporting students' emotional well-being, please contact Tammy Bolen, Program Supervisor for Social Emotional Learning, at 360-725-6042 or [tammy.bolen@k12.wa.us](mailto:tammy.bolen@k12.wa.us).

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