Your Question:
You asked about states that have established emergency or temporary waivers of graduation requirements in response to the COVID-19 pandemic.

Our Response:
In general, it is unclear if the graduation flexibilities granted to districts and students exclusively during the 2019-20 school year will be extended to the 2020-21 school year. Additionally, we have not seen states set limits on the type or number of credits that can be waived or define good faith efforts. Rather, department guidance 1) noted that some districts had adopted policies that exceeded the state minimum of required credits, 2) provided guidance on which state-set requirements could be waived or altered or 3) outlined how to meet or waive assessment requirements during school closures.

Education Commission of the States has a 50-State Comparison of high school graduation requirements. One of the data points shows how many total course units are required by the state. We assume the default limit on the number of credits that could be waived would be such that no district could fall below the state required minimum; however we have not seen a bill that provides districts with a blanket ability to lower the number of required credits. Below, we provide a list of related state actions and detail when states addressed any of the specifics you’ve asked about.

Policy Examples That Include the 2020-21 School Year

**Colorado:** Local education agencies have authority over the number of courses required for graduation. The department of education voted to provide flexibility for graduation guidelines in the 2020-21 school year by allowing LEAs to graduate students according to locally determined graduation requirements, or through alignment with the graduation guidelines that were originally scheduled to go into effect in the 2020-21 school year.

**District of Columbia:** B 23-1027 (enacted, 2020) extends to the 2020-21 school year a waiver of the volunteer community service graduation requirement.

**Massachusetts:** H.B. 4616 (enacted, 2020) authorized the board of elementary and secondary education to modify or waive high school graduation requirements in response to the pandemic. The department of education’s webpage on graduation requirements provides details on how students in classes of 2021-23 will meet the competency determination standard. In short, the board voted to modify the science and technology part of the competency determination requirement for members of the classes of 2021-23. Guidance (.doc download) states that students will meet the requirement through a “demonstration that the student earned credit for a course in the relevant subject matter and demonstrated competency in one of the four tested disciplines (biology, chemistry, introductory physics, technology/engineering) during their high school career.”

**Pennsylvania:** S.B. 1216 (enacted, 2020) delays the administration of the Keystone Exams as a graduation requirement to the 2022-23 school year. The bill allows completion of a course in an academic content area...
associated with a Keystone Exam to replace the exam for the 2019-20 school year and all subsequent school years in which the federal government waives testing and accountability requirements.

**Policy Examples Exclusive to the 2019-20 School Year**

**North Carolina:** The board of education adjusted [2020 graduation requirements](#) so that no district could require students to earn more than 22 credit hours, the state’s designated minimum. The guidance also recommended that the Occupational Course of Study Paid Hour Work requirement be lowered to 157 hours of paid work from the original 225 hours.

**Ohio:** [H.B. 164](#) (enacted, 2020) allowed students who were scheduled to take or retake end-of-course examinations, but were unable to do so due to school closures in spring 2020, the option to substitute their final course grade in lieu of examination scores to satisfy graduation requirements. The department of education created a graduation [FAQ page](#); however that page has not been updated to reflect the 2020-21 school year.

**Oklahoma:** The state superintendent of public instruction published an [FAQ memo](#) that addressed graduation requirements, noting that awarding credits, attendance and assessment requirements for graduation are determined solely by the district. The guidance notes that the state minimum number of credit hours is 23, and many districts had adopted policies that exceeded the minimum or required additional courses that were not a part of the state’s list of required courses. Local boards were reminded that they could amend their requirements in order to ensure students graduate on time.