

To: All LEAs, Superintendents, IU Executive Directors, and Act 48/45 Providers  
From: Lee Burket, Ed.D., Director, Bureau of Career and Technical Education

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Subject: Statewide High School Graduation Requirement for CTE Concentrators

### Frequently Asked Questions

#### Statewide High School Graduation Requirement for Career and Technical Education Concentrators

On June 21, 2017, Governor Wolf signed Act 6 of 2017 ("Act 6") into law. Act 6, which amended section 121 of the Pennsylvania School Code, 24 P.S. § 1-121, sets forth alternative pathways to graduation for students who are career and technical education (CTE) concentrators. Act 55 of 2017, enacted on November 6, 2017, also impacts statewide high school graduation requirements by further delaying implementation of statewide graduation requirements until the 2019-20 school year.

The Pennsylvania Department of Education (PDE) continues to work with the General Assembly to develop additional changes to the commonwealth's current statewide graduation requirements. Pursuant to Act 1 of 2016, PDE provided a report of findings and recommendations <<https://na01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.education.pa.gov%2FDocuments%2FK-12%2FPDE%2520Act%25201%2520Report.pdf&data=02%7C01%7Cafitterer%40pa.gov%7Ce8db3be784f74a5ed3f408d4e357de39%7C418e284101284dd59b6c47fc5a9a1bde%7C1%7C1%7C636383413958969918&sdata=t%2Bb1HJ93bClmgOpwO7L7%2FrLColX6C3E5Qeei3wK7NM%3D&reserved=0>> to the General Assembly, which included four suggested pathways to graduation; the provisions of Act 6 reflected one of those four recommended pathways. PDE concluded that current graduation requirements too narrowly define postsecondary success. In order to more accurately recognize the varied pathways to postsecondary success, PDE recommended alterations that reflect those pathways by offering options for students to demonstrate readiness. PDE continues to advocate for additional changes that will benefit all commonwealth students.

This document addresses the most frequently asked questions related to the implementation of Act 6. Questions may be directed to [ra-edstateassessment@pa.gov](mailto:ra-edstateassessment@pa.gov) <<mailto:ra-edstateassessment@pa.gov>>.

1. When do the provisions of Act 6 go into effect?

Unless further legislative action is taken, beginning with the graduating class of 2020, CTE concentrators may take advantage of the graduation pathways set forth in Act 6.

2. Does Act 6 excuse CTE concentrators from taking the Keystone Exams?

No. All states are required to administer statewide high school assessments in math, English language arts and science for the purposes of federal accountability. The Keystone Exams are Pennsylvania's statewide high school assessments, and Act 6 does not change assessment participation requirements for any students. All students, including students enrolled in CTE programs are required to take the Algebra I, Literature and Biology Keystone Exams. Act 6 decouples these exams from the statewide graduation requirement for CTE concentrators.

3. Does successful completion of the graduation pathways set forth in Act 6 satisfy statewide graduation requirements, regardless of proficiency on all three Keystone Exams or corresponding Project Based Assessments (PBA)?

Yes, although all students are required to take the Algebra I, Literature, and Biology Keystone Exams for purposes of federal accountability and reporting, CTE concentrators who successfully complete the graduation pathways set forth in Act 6 are deemed to have achieved statewide graduation requirements. However, all students must also satisfy the graduation requirements adopted by the Local Education Agency's (LEA) governing board in order to graduate.

4. Who is a CTE concentrator?

Act 6 defines a CTE concentrator as a student who, by the end of a reporting year, will be reported as successfully completing at least 50 percent of the minimum technical instructional hours required under 22 Pa. Code Ch. 339 (relating to vocational education). The student must be enrolled in a PDE-approved CTE program to be considered a CTE concentrator.

For 1- and 2-year programs that provide a minimum total of 720 hours of vocational program instruction, a CTE student achieves concentrator status after completing 360 hours of vocational program instruction. Most students enrolled in a 1-year program should reach concentrator status during the middle of their senior year. Most students in a 2-year program should reach concentrator status at the end of their junior year.

For a 3-year program that provides a minimum of 1,080 hours of vocational program instruction, a CTE student achieves concentrator status after completing 540 hours of vocational program instruction. Most students enrolled in a 3-year program should reach concentrator status at the middle of their junior year.

For a 4-year program that provides a minimum of 1,320 hours of vocational program instruction, a CTE student achieves concentrator status after completing 660 hours of vocational program instruction. Most students enrolled in a 4-year program should reach concentrator status at the end of the sophomore year.

5. Often, it cannot be determined that a student is a CTE concentrator until late in high school. Given that context, do the supplemental instruction, retesting, and project-based assessment requirements found in Chapter 4 apply to students in CTE programs who may be on track to be a CTE concentrator but have not yet been identified as such?

It is required that vocational education be made available to all students in a high school program

and students should not be denied enrollment in a CTE program based solely on reasons related to academic preparation. Accordingly, it is strongly recommended that students who are on a pathway to becoming a CTE concentrator should receive academic coursework and assessments consistent with the students' career goals. Students should not be removed from CTE programs for purposes of supplemental instruction as this may impede their ability to become a CTE concentrator.

All remediation efforts (e.g., supplemental instruction, retesting, participation in the project-based assessment support) required under 22 Pa. Code Chapter 4 remain applicable to all students. These requirements in no way mandate intrusion into CTE instructional time and LEA's are strongly encouraged to allow students every opportunity including all available instructional time to gain competence in their CTE concentration area and "demonstrate a high likelihood of success on an approved industry-based competency assessment." Therefore, the need for remediation should not serve as rationale for denying access to a CTE program. Further, it is recommended that LEAs strongly consider waiting to administer the PBA to a student enrolled in a CTE program until the student is in 12th grade, so the student has every opportunity to "demonstrate a high likelihood of success on an approved industry-based competency assessment." If the student is a CTE concentrator who can satisfy the graduation pathways, the PBA does not need to be administered to the student.

6. Who establishes grade-based requirements for academic content areas related to each Keystone Exam on which a CTE concentrator was not proficient?  
Each LEA determines the minimum grade requirement for each course related to the academic content area.

7. What qualifies as an "industry-based competency certification"?  
The Industry-Recognized Credentials for Career and Technical Education Programs <<http://www.education.pa.gov/Documents/K-12/Career%20and%20Technical%20Education/Teacher%20Resources/Industry%20Recognized/Industry%20Recognized%20Credential%20Resource%20Guide.docx>> includes a list of industry-based certifications.

8. What qualifies as an "approved industry-based competency assessment"?  
The industry-based competency assessments to which the law refers are NOCTI exams, NIMS assessments or other industry-based competency assessments that may be identified by the Secretary of Education and approved by the State Board of Education.

9. How are "demonstrates a high likelihood of success on an approved industry-based competency assessment" and "readiness for continued meaningful engagement" defined?  
LEAs, via a chief school administrator, in consultation with a CTC director or a principal of a comprehensive high school (whichever is applicable), must make individual determinations related to each student, by the end of 11th grade or if the student is enrolled in a one-year program the determination should be made as soon as possible during the 12th grade year. LEAs should consider a student's performance on benchmark assessments, course grades and other factors consistent with the student's goals and career plan.

10. What is PDE's role in determining whether LEAs appropriately implement Act 6?

Each LEA determines whether its students, including CTE concentrators, have satisfied all graduation requirements; PDE plays no role in that determination. However, LEA records related to each student are subject to review by auditors, who may review whether LEAs are properly implementing the laws related to graduation requirements.

11. Does Act 6 affect PIMS reporting related to graduation data?

No. Consistent with past practice, LEAs retain individual student records to determine which students will graduate and report in PIMS each student's graduation status.