

**New York State (NYS) Career Development and Occupational Studies  
(CDOS) Commencement Credential  
Questions and Answers  
November 2013  
(Updated August 2014)**

**A. Eligibility**

- 1. Can a student with a disability receive the CDOS Commencement Credential if he/she continues in high school beyond four years?**

Yes.

- 2. If a student is expected to be able to graduate with a Regents diploma, must that student participate in the requirements for the CDOS Commencement Credential?**

While not required, all students with disabilities should be encouraged to earn the CDOS Commencement Credential as a supplement to their local or Regents diploma.

- 3. Can a student be awarded the CDOS Commencement Credential if he/she has met all of the criteria for the CDOS Commencement Credential; attended school for at least 12 years, excluding kindergarten; has not yet earned a diploma; and is not planning to return to school the next year?**

Yes. If the student's only exiting credential is the CDOS Commencement Credential (i.e., the student has not yet earned a diploma), the credential must be accompanied by a written statement informing the parent that the student continues to be eligible for a free appropriate public education (FAPE) until the student has earned a local or Regents diploma or until the end of the school year in which the student turns age 21, whichever occurs earlier. The State's required Prior Written Notice has been revised to incorporate language regarding the award of the CDOS Commencement Credential (<http://www.p12.nysed.gov/specialed/formsnotices/PWN/home.html>).

- 4. If a student turns 21 in August, would he/she be eligible to stay in school for another year?**

No. The student would not be eligible to remain in school the following school year. Section 200.5(a)(5)(iii) of the Regulations of the Commissioner of Education indicates that the student continues to be eligible for FAPE until the end of the school year in which the student turns 21 or until the receipt of a regular high school diploma. Section 4402(5) of NYS Education Law indicates that students with disabilities reaching the age of 21 between July 1 and August 31 are eligible to remain in school until the 31st day of August or until the end of summer program,

whichever occurs first. Students turning age 21 between September 1 and June 30 are entitled to remain in school until June 30 or until the end of the school year, whichever comes first.

- 5. May a student who earns the CDOS Commencement Credential as his/her only exiting credential participate in the high school graduation ceremony and “walk across the stage?” May a student who doesn’t earn either a regular diploma or the credential participate in the graduation ceremony?**

Nothing in State law, regulation or guidance prevents a student from participating in graduation ceremonies. How a school conducts a graduation ceremony and the requirements needed for participation are a local decision made by the school district.

- 6. Can a student that takes the New York State Alternate Assessment (NYSAA) for some subject areas and Regents exams for other subject areas be eligible for the CDOS Commencement Credential? (August 2014)**

A student with a disability, who meets the definition in section 100.1(t)(2)<sup>1</sup>, may be recommended by the committee on special education (CSE) to participate in the State’s alternate assessment only for selected assessments if, for the other assessment areas, the student can achieve the State’s standards for all students in other subject areas and be assessed through the regular State assessments (Regents examinations). (State data shows very few instances when this has occurred in the past.) However, in the exceptional instances when this may occur, such student may be eligible for the CDOS Commencement Credential if the student meets the requirements, including achievement at the commencement level of the State’s CDOS Learning Standards.

- 7. If a student with a disability has been identified to participate in NYSAA, yet the CSE believes the student was misidentified for NYSAA, could the CSE recommend that the student participate in the general education assessments and work toward the local/Regents diploma and CDOS Commencement Credential? (August 2014)**

Yes. Decisions regarding a student’s participation in State assessments are important and must be thoughtfully determined by the CSE, which includes the parents. The CSE must consider annually whether the student will participate in the general assessments (Regents examinations) or the alternate assessments

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<sup>1</sup> Students with severe disabilities means students who have limited cognitive abilities combined with behavioral and/or physical limitations and who require highly specialized education, social, psychological and medical services in order to maximize their full potential for useful and meaningful participation in society and for self-fulfillment. Students with severe disabilities may experience severe speech, language, and/or perceptual-cognitive impairments, and evidence challenging behaviors that interfere with learning and socialization opportunities. These students may also have extremely fragile physiological conditions and may require personal care, physical/verbal supports and/or prompts and assistive technology devices.

(NYSAA) and document that recommendation in the student's individualized education program (IEP). Although an infrequent occurrence, the CSE may determine it is appropriate to change the student from one assessment to the other.

**8. Are students with a Section 504 Plan eligible for the CDOS Commencement Credential? (August 2014)**

No. Only students with disabilities who receive special education services pursuant to the Individuals with Disabilities Education Act (IDEA) may be awarded the CDOS Commencement Credential.

**9. Are students who have been declassified eligible for the CDOS Commencement Credential? (August 2014)**

No. The CDOS Commencement Credential may only be awarded to a student with a current IEP.

**10. Are students with a disability that have an IEP, are enrolled in an Alternative High School Equivalency Program (AHSEP) or Alternative Transition Program (ATP) and working towards attainment of the New York State's high school equivalency diploma (Test Assessing Secondary Completion - TASC) eligible for the CDOS Commencement Credential? (August 2014)**

Yes. A student with a disability working towards a high school equivalency diploma and enrolled in a New York State Education Department (NYSED) approved AHSEP or ATP is eligible to receive the CDOS Commencement Credential provided the student completed all of the requirements for the credential.

**11. Is the CDOS Commencement Credential available to students without disabilities? (August 2014)**

No. Only students with disabilities who receive special education services pursuant to IDEA and are not eligible for NYSAA may be awarded the CDOS Commencement Credential.

**12. May a student with a disability who has graduated with a regular high school diploma return to school to work toward the CDOS Commencement Credential? (August 2014)**

No. A school district has fulfilled its obligation to provide FAPE when a student with a disability graduates with a regular high school diploma (Regents or local diploma).

**13. What questions should schools consider to ensure the CDOS Commencement Credential is appropriately awarded under Option 1? (August 2014)**

Districts must ensure that the CDOS Commencement Credential is awarded with fidelity, consistent with its requirements and intended purpose as a certificate of readiness for entry level employment. Districts should be able to answer yes to each of the following questions and feel confident that the student has met the requirements for the credential.

- Does the student have a career plan in which he/she participated in the development? Do you have a copy of the career plan in effect during the student's final year of school?
- Does the school have evidence that the student attained each of the CDOS Learning Standards at the commencement level?
- Did the student *successfully* complete at least 216 hours of career and technical education (CTE) coursework and/or work-based learning, including at least 54 hours of work-based learning?
- Does the student have at least one employability profile completed within his/her last year of high school by an individual knowledgeable about his/her skills? Is the name and title of that person included and is it signed and dated? Does it document the student's employability skills and experiences; and, as appropriate, attainment of technical knowledge and work-related skills, work experiences, performance on industry-based assessments and other work-related and academic achievements?
- Did the student graduate with a regular high school diploma or attend school for at least 12 years, excluding kindergarten?
- Is the student truly ready for entry-level employment? If you were an employer, would you hire this student?

**14. Is a high school diploma required for consideration for civil service section 55(b) employment? (August 2014)**

No. According to the NYS Department of Civil Service, individuals applying for a position under Section 55(b) are not required to have a high school diploma. Section 55(b) of NYS Civil Service Law is a specialized program to place individuals with disabilities in entry level State jobs and requires no written or oral examination. Candidates must submit a formal application along with a medical evaluation. Section 55(b) authorizes State agencies to designate up to 1,200 positions in the noncompetitive class to be filled by qualified people with disabilities. Eligibility is based on each individual's degree of functional limitation and employment history. See <http://www.cs.ny.gov/dpm/b55.cfm> for additional information.

**15. Is a student exiting high school with the CDOS Commencement Credential in the absence of a regular diploma considered a dropout? (August 2014)**

No. Students exiting high school with only the CDOS Commencement Credential would be considered a "high school completer". These students would not be included in either the "drop out" or "graduation" counts.

## **B. Instruction**

### **CDOS Learning Standards**

**1. Are the CDOS Learning Standards aligned with the NYS Common Core Learning Standards (CCLS)?**

The CDOS learning standards have not yet been revised to incorporate the CCLS. However, the NYS CTE Technical Assistance Center has developed a crosswalk between the CCLS and the CDOS learning standards. The crosswalk is available at <http://nyctecenter.org/content/userfiles/files/CCSS%20CDOS%20Crosswalk%20ELA.pdf>.

**2. If the student does not meet all standards (1, 2 and 3a) at the commencement level, is he/she eligible for an award of the CDOS Commencement Credential?**

No. The school district must have evidence that the student has demonstrated commencement level knowledge and skills relating to the CDOS learning standards (career development, integrated learning and the universal foundation skills) to award this credential to a student. However, it is not necessary for the student to complete all of the sample tasks to demonstrate attainment of that standard.

### **Opportunities to Earn a Diploma**

**3. What are appropriate opportunities to earn a Regents/local diploma?**

A student with a disability must be provided with appropriate opportunities to earn a Regents or local high school diploma. This includes providing a student with meaningful access to participate and progress in the general curriculum and coursework to assist the student to meet the State's learning standards and the requirements for graduation with a regular (local or Regents) high school diploma. Meaningful access to the general education curriculum means that a student with a disability is participating in credit-bearing courses with the appropriate supports, services and accommodations to address his or her disability. The student's IEP indicates the special education programs, services, and supports the student needs to be involved and progress in the general education curriculum. All students with disabilities, except those with severe cognitive disabilities who are assessed against alternate standards, must be engaged in courses and coursework required to earn the necessary credits and to take the required Regents assessments. Students with disabilities should not be placed on a "separate track" to receive the CDOS Commencement Credential.

**4. Is seat time in general education classes a way to provide opportunities to earn a regular high school diploma and access to participate and progress in**

**the general education curriculum if the student is not able to pass the curriculum?**

Access to and participation in the general education curriculum does not occur solely because a student is placed in a general education classroom, but rather when he or she is engaged in learning the content and skills that define the general education curriculum. Specially designed instruction is provided through a continuum of services designed to meet the unique needs of each student with a disability. For some students with disabilities, a special class for all or part of the day may be an appropriate special education program necessary for the student to have access to participate and progress in the general curriculum. The student's IEP, as developed by the CSE, indicates the special education programs, services, and supports the student needs to be involved and progress in the general education curriculum to meet the student's unique needs.

**5. Are modified curriculum classes for students with disabilities considered access to participate and progress in general education?**

Yes. Modified curriculum classes for students with disabilities may be considered access to participate and progress in general education if documented as a special education support or service in the student's IEP. Access to the general education curriculum not only means that students are taking the appropriate courses needed to earn a Regents or local high school diploma, but also that they are being provided with appropriate specially designed instruction, accommodations, supports and services to progress in the curriculum.

**6. Does a student with a disability have to participate in Regents examinations, including those participating in expanded delivery of coursework over two - three years?**

A student with a disability who completes a Regents course must have the opportunity to take the required Regents exam. The CSE may not exempt any student from such participation. Regents exams may be taken multiple times, and there are safety net options available so that students with disabilities may graduate with a local diploma. More information regarding these options is available at <http://www.p12.nysed.gov/specialed/publications/safetynet-qa.htm>.

In addition, the student's IEP must indicate, if appropriate, any testing accommodations the student needs in order to participate in testing programs on an equal basis with his/her nondisabled peers. Such accommodations provide students with the ability to demonstrate mastery of skills and attainment of knowledge without being limited or unfairly restricted due to the effects of a disability. Guidance on test access and accommodations for students with disabilities is available at <http://www.p12.nysed.gov/specialed/publications/policy/testaccess/policyguide.htm>.

**7. When is a decision made to have a student stop working toward a diploma and concentrate on earning this credential?**

At no point should a decision be made that a student stops working toward a regular high school diploma in order to concentrate on earning this credential. Preparation for attainment of the CDOS Commencement Credential is not a track. A student with a disability must be 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.

**8. If a student with a disability has completed transition planning, the CTE coursework and work-based learning requirements to earn a CDOS Commencement Credential, and remains in or returns to school, must districts provide programming other than access to the general education curriculum for students who have not yet earned a Regents diploma?**

Transition planning and activities are not completed until the student exits high school. In addition, the hours of instruction and work-based learning requirements to earn the CDOS Commencement Credential is a minimum standard. All students should be encouraged to evolve their work readiness skills beyond the minimum requirements, and all districts should provide students with additional coursework and work-based learning experiences beyond the 216 hour requirement while the student continues in school to earn a regular high school diploma.

**9. How will students have time to work toward both the CDOS Commencement Credential and a regular high school diploma?**

Each student with a disability who is age 15 and older must have an IEP that includes a coordinated set of activities that prepare the student to meet his/her post-secondary goals, including employment goals. In developing this plan, CSEs should consider the student's need for courses of study that will prepare him/her to earn this credential. To earn the CDOS Commencement Credential, a student must have successfully completed in grades 9-12, a minimum of 216 hours of CTE coursework and/or work-based learning activities. Fifty-four (54) of the 216 hours must include 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 CTE course(s). Over a four (or more) year period of time (grades 9-12), it is reasonably expected that schools can provide students with work-based learning activities such as job shadowing, community service, volunteering, service learning, senior project(s) and/or school-based enterprise(s). Although work-based learning experiences must be provided consistent with NYSED guidelines and under the supervision of the district, participation in these activities may occur outside of regular school hours.

In addition to the minimum 216 hours of career preparation, the district must have documentation that a student has achieved the commencement level CDOS learning standards in the areas of career development, integrated learning and universal foundation skills. NYSED has existing guidance on sample instructional activities as examples of how the CDOS standards can be presented in the classroom (<http://www.p12.nysed.gov/cte/cdlearn/documents/CDOS-intro.pdf>). Some activities are short, one-day events that focus on a single topic or concept. Others are multi-day instructional units that lead students through inquiry processes that increase their understanding. While there are specific CDOS standards, there are unlimited ways to teach those standards.

To provide additional flexibility, a student with a disability has the option to earn the CDOS Commencement Credential if he/she has earned one of the nationally recognized work readiness credentials in lieu of the other minimum career plan, instruction and employability profile requirements.

**10. The regulations indicate that a school district that awards the credential to more than 20 percent of students with disabilities in the cohort, where the credential is not a supplement to a regular diploma, may be subject to redirection of a portion of their IDEA funds. What portion of these funds will be reallocated? How is the 20 percent ceiling being calculated?**

To clarify, there is no cap on the percentage number of students with disabilities that can receive the CDOS Commencement Credential where the credential is not a supplement to a regular diploma. However, when a district awards the credential to more than 20 percent of the students with disabilities in the cohort, where such credential is not a supplement to a regular high school diploma, NYSED may, at its discretion, determine that the reason for the numbers of students receiving the CDOS Commencement Credential as their sole credential is because the district failed to provide students with disabilities with appropriate access to participate and progress in the general education curriculum necessary to earn a regular high school diploma. The amount of funds to be redirected would be determined on a case by case basis, depending on the findings of the State.

### **Work-Based Learning**

**11. If the student achieves the required 216 equivalent hours through coursework, can the individual “opt out” of the 54 hours of work-based learning?**

No. The student cannot “opt out” of the work-based learning requirement if he/she is earning the credential through option 1. However, where at least 54 hours of work-based learning is a component of a CTE course, the student’s successful completion of the CTE course would demonstrate that the student completed the minimum 54 hours of work-based learning.

## **12. How can schools get approval of their work-based learning programs?**

Only those work-based learning programs associated with registered CTE programs must be approved by NYSED. These include the Career Exploration Internship Program (CEIP); General Education Work Experience Program (GEWEP); Work Experience and Career Exploration Program (WECEP); and CTE Cooperative Work Experience Program (CO-OP). Other work-based learning options (e.g., job shadowing; community service; volunteering; service learning; senior projects; school-based enterprises and community based work programs) are developed at the local level and must be provided consistent with NYSED guidance. Information regarding work-based learning requirements and the application for an NYSED registered program is available at <http://www.p12.nysed.gov/cte/wbl/home.html>.

## **13. Could a student with a disability use part-time/full-time employment outside of school to count toward the work-based learning requirement? If so, could school supervision be a collection of documented evidence of hours completed per work supervisor (time card/anecdotal meeting with employer)?**

A school district may enter into formalized agreements for the provision of transition services such as vocational training programs approved by NYSED or by another State agency. In these cases, a student's employment could be counted toward the work-based learning requirement. However, a student cannot use his/her independent employment outside of school to count toward the number of hours of work-based learning that is required for the CDOS Commencement Credential. Work-based learning experiences must be provided consistent with NYSED guidelines, under the supervision of the district and documented in a student's transcript. Guidance on these and other work-based learning programs is available at <http://www.p12.nysed.gov/cte/wbl/home.html>.

## **14. What are the duties of a job coach?**

A job coach is a person who provides on-the-job training to individuals to help them adjust to the work environment. A job coach's duties include:

- assistance with learning specific work duties and performance standards (doing the task);
- development of work-related behaviors such as time and attendance, dress, communication skills, accepting supervision and travel skills; and
- helping the student acquire a sense of belonging at the work site and encouraging an understanding of and a participation in employee programs which involves socialization with coworkers.

## **15. Are teaching assistants qualified to accompany and/or monitor students during community work-based experiences, or will they need to be a job coach?**

Yes. Teaching assistants may accompany and/or monitor students during community-based work experiences provided they do so under the supervision of a teacher who may or may not be present at the work site. Teaching assistants often fulfill the role of job coach, providing ongoing, on-site coaching for students that have more intense needs and require more direct supervision and training in order to work at a job site. It is recommended that job coaches complete a job coach training program.

**16. Can a teacher aide serve as a job coach?**

No. The job duties of a teacher aide are limited to nonteaching duties such as:

- managing records, materials and equipment;
- attending to the physical needs of children; and
- supervising students and performing such other services to support teaching duties when such services are determined and supervised by teacher.

Because a job coach must assist students with disabilities learning specific work duties and performance standards, it would be inconsistent with the responsibilities of a teacher aide to perform such duties.

To assist in determining the appropriate roles for a teacher assistant and a teacher aide, a description of duties is provided at: <http://www.highered.nysed.gov/tcert/career/tavsta.html>.

**17. Can a district contract with a community agency to provide job coaching services?**

Yes. Section 4401(2)(n) of NYS Education Law authorizes districts to enter into formal agreements or contracts with community agencies approved by NYSED or another State agency to provide transition services, which may include job coach services, to students with disabilities. Transition services including, but not limited to, participation in work experiences, job coaching, and acquisition of employment skills as documented in a student's IEP, may be funded through excess cost aid and are considered purchased services. Additionally, another State agency may provide or pay for any transition service that the agency would otherwise provide to students with disabilities who meet the eligibility criteria of that agency.

**18. Will teachers providing work-based learning experiences need to have a specific certification such as a work-based learning extension?**

Those providing work-based learning experiences associated with NYSED registered programs must, depending upon the type of program, be certified as a work-based learning coordinator completing an 8981 extension (Coordinator of Work-Based Learning Programs for Career Awareness) or an 8982 extension (Coordinator of Work-Based Learning Programs for Career Development). For individuals supervising locally approved community-based work programs, it is

highly recommended but not required that they complete the certification requirements for Coordinator of Work Based Learning Programs for Career Awareness – extension #8981 (<http://www.p12.nysed.gov/cte/wbl/home.html>).

**19. Can a district arrange for students with disabilities to participate in work-based learning experiences provided by a community organization? If so, can that experience be counted toward the work-based learning requirement for the CDOS Commencement Credential? (February 2014)**

Yes, provided the community organization has been approved by NYSED or another State agency to provide such services. Education Law section 4401(2)(n) authorizes school districts to enter into formalized agreements for the provision of transition services (as defined in Education Law section 4401[9]) with programs such as vocational training programs that are approved by NYSED or by another State agency (e.g., Office for People With Developmental Disabilities, Office of Mental Health, Adult Career and Continuing Education Services (ACCES), Commission for the Blind). All formalized agreements and contracts for instruction must be consistent with State requirements as clarified at <http://www.p12.nysed.gov/resources/contractsforinstruction/qa.html>.

**20. If a school district enters into a contract or formalized agreement with a community agency to provide work-based learning experiences as a transition service, who would be responsible for funding the activity? (February 2014)**

School districts must ensure that a student with a disability receives his/her transition services at no cost to the parent. Transition services may be provided by the school district or by a participating agency. Participating agency, as defined in section 200.1(jj) of the Regulations of the Commissioner of Education, means a State or local agency, other than the public agency responsible for the student's education, that is financially and legally responsible for the provision of transition services.

Beginning with the first IEP in effect for students age 15 and older, and at a younger age if determined appropriate, the IEP must include a statement of the responsibilities of the school district and, when applicable, participating agencies for the provision of such services and activities that promote student movement from school to post-school opportunities (8 NYCRR section 200.4 (d)(2)(ix)(e)). Such services would be documented in the coordinated set of activities section of the student's IEP.

If a participating agency fails to provide agreed-upon transition services contained in the student's IEP, the district responsible for the student's education must, as soon as possible, initiate a meeting to identify alternative strategies to meet the transition objectives and, if necessary, revise the student's IEP (8 NYCRR section 200.4(e)(6)). Nothing relieves a participating agency of its responsibility to provide

or pay for any transition service that the agency would otherwise provide to students with disabilities who meet its eligibility criteria (8 NYCRR section 200.4 (e)(6)).

**21. Is there any funding mechanism in the System to Track and Account for Children (STAC) to reimburse districts and/or community agencies for specific transition services provided by a community agency? (February 2014)**

Districts may contract with the entities identified in section 4401 of the Education law to provide special education services, including transition services. Education Law sections 4401(2) and 4402(2)(b) authorize school districts to enter into contracts for special education services or programs, including related services, with other school districts, Boards of Cooperative Educational Services (BOCES), State-operated and State-supported schools, approved private residential and nonresidential schools both in and out of NYS, and the State University at Binghamton for nonresidential special education services and programs at the Children's Unit. Education Law section 4401(2)(n) authorizes school districts to enter into formalized agreements for the provision of transition services (as defined in Education Law section 4401(9)) in programs such as vocational training programs approved by NYSED or by another State agency. A district may not contract or enter into a formalized agreement with community agencies to provide transition services if the community agency programs are not an approved program pursuant to Education Law section 4401(9), nor may the district submit a STAC for tuition reimbursement of such programs and services.

Districts may use their 611 Individuals with Disabilities Education Act funds to pay for transition services and, to the extent a contract for services is consistent with Education Law section 4401, it may be appropriate to submit a STAC. For guidance on STAC and State Aid for students with disabilities, see [http://www.oms.nysed.gov/stac/schoolage/schoolage\\_placement\\_summary/home.html](http://www.oms.nysed.gov/stac/schoolage/schoolage_placement_summary/home.html). For additional information, contact [omsstac@mail.nysed.gov](mailto:omsstac@mail.nysed.gov).

**Coursework**

**22. Does the requirement for completion of CTE coursework and/or work-based learning experiences mean that the student will have to be enrolled in separate specific courses, or can the hours be completed through integration in other courses or settings?**

To earn the CDOS Commencement Credential, the student must successfully complete the equivalent of two units of study or 216 hours in CTE course(s) and/or work-based learning experiences. The CTE coursework can consist of specialized and integrated courses (grades 9-12) that are approved by the local board of education or through NYSED registered CTE programs. Students must have a minimum of 54 hours of the total 216 hours in 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 CTE course(s). Students may complete all of the 216 hours through participation in work-based learning. The 216 hours, whether achieved through completion of CTE coursework and/or work-based learning, may begin accumulating in 9th grade.

**23. Could school district general education courses that integrate CDOS learning standards (e.g., English language arts (ELA) where an activity is creating a resume) count toward 2 units of study in CTE coursework?**

No. General education courses (e.g., ELA) do not count toward the two units of study required for this credential. The equivalent units of study must be earned through coursework in CTE and/or work-based learning experiences. A CTE course means a grade 9-12 course in career and technical education that consists of specialized and integrated courses that are approved by the local board of education or by NYSED.

**24. If a student is enrolled in a course(s) that would provide him or her with 216 hours of work-based learning, but the student is absent several times, does the student need to make up lost hours in order to meet the requirement for award of the credential?**

In order to satisfactorily complete the course, students must meet class attendance requirements as established by the district.

**25. If a school district develops a locally approved CTE course, what must the coursework/curriculum include?**

The majority of all courses that districts offer are locally developed and locally approved. For purposes of this credential, CTE coursework, whether locally approved or approved by NYSED, means courses completed in grades 9-12 which could be specialized or integrated courses in CTE. Such courses must:

- be aligned to the learning standards (in this case, the CDOS learning standards);
- be taught by a CTE teacher with CTE certification appropriate to the course description;
- meet the unit of study requirement consistent with section 100.1(a) of the Regulations of the Commissioner of Education (at least 180 minutes of instruction per week throughout the school year or the equivalent); and
- if credit is being awarded, meet the unit of credit requirements established in section 100.1(b) of the Regulations of the Commissioner of Education. A unit of credit is earned by:
  - the mastery of the learning outcomes set forth in a NYS-developed or locally developed syllabus for a given high school subject, after a student has had

- the opportunity to complete a unit of study in the given subject matter area;  
or
- pursuant to section 100.5(d)(1) of the Regulations, a passing score of at least 85 percent or its equivalent on a NYSED-approved examination in a given high school subject without the completion of a unit of study, and the successful completion of either an oral examination or a special project.

CTE course offerings approved at the local level are in the following content areas:

- Agricultural;
- Business and Marketing;
- Family and Consumer Sciences; and
- Technology.

While courses for this credential must be CTE content area specific (e.g., Agricultural), a course may focus specifically on Agriculture, or one or more of the four CTE content specific areas (e.g., Agricultural and Technology) may be combined to comprise one course. One course may also expose students to the four different content areas (i.e., Agricultural; Business and Marketing; Family and Consumer Sciences; and Technology).

Coursework in which a student participates should also be consistent with his/her strengths, preferences and interests.

## **26. Do schools or agencies need to get approval of their CTE courses in order to award the NYS CDOS Commencement Credential?**

For purposes of this credential, CTE course(s) include grade 9-12 course(s) in CTE consisting of specialized and integrated courses that are either approved by the local board of education (locally approved) or included in an NYSED registered CTE program (NYSED approved). Students working toward the CDOS Commencement Credential may participate in NYSED-approved CTE programs or take locally approved courses. For locally approved courses, the local board of education has much flexibility in designing and/or realigning existing courses to meet the needs of the students pursuing the CDOS Commencement Credential. For example, CTE course offerings approved at the local level include those in Agricultural; Business and Marketing; Family and Consumer Sciences; and Technology. While the locally approved courses must be CTE content area specific (e.g., Agricultural), a course may focus specifically on Agriculture, or one or more of the four CTE content specific areas (e.g., Agricultural and Technology) may be combined to comprise one course. One course may also expose students to the four different content areas (i.e., Agricultural; Business and Marketing; Family and Consumer Sciences; and Technology). For locally approved courses, approval from NYSED is not required.

Information regarding the approval process and required coursework for NYSED registered CTE programs is available at <http://www.p12.nysed.gov/cte/ctepolicy>.

**27. If a two unit CTE course(s) for the CDOS credential is a board (locally) approved program, who can teach the course?**

As with NYSED-approved (registered) programs, locally developed CTE courses must also be taught by CTE teachers. Unless also certified as a CTE teacher, a special and/or general education teacher cannot teach courses required for award of this credential. However, the CTE teacher and special and/or general education teacher may work together to co-plan and/or deliver the coursework.

**C. Career Plan**

**1. When should the student begin a Career Plan?**

Students working toward this credential should begin commencement level career planning in grade nine. However, districts are encouraged to engage students in career planning early on in a student's education as it is an important mechanism to add relevance and meaning to learning experiences across subject areas. Section 100.2(j)(ii) of the Regulations of the Commissioner of Education requires that a student's guidance program in grades 7-12 shall include an annual review of each student's educational progress and career plans. NYS provides model Career Plans beginning in kindergarten which districts may, but are not required to use. NYS model career plans are available at <http://www.p12.nysed.gov/cte/careerplan>. Beginning in grade six, students may also create individual Career Plans with the "My Portfolio" tool found at the NYS Department of Labor's CareerZone web site available at [www.careerzone.ny.gov](http://www.careerzone.ny.gov).

**2. How often should the Career Plan be completed or reviewed during a student's high school career?**

To ensure the student is actively engaged in career planning, the school district must have evidence that the student has developed, annually reviewed, and, as appropriate, revised his/her career plan. Additionally, a student's preferences and interests as identified in his/her career plan must be reviewed annually and considered in the development of his/her IEP. While the career plan is a student-developed document, some students may require assistance in completing their career plan and districts must, as appropriate, provide such assistance to students. How frequently a student works on his/her career plan will depend upon the individual student and his/her unique needs.

**3. Many of the students I work with have unrealistic goals for their future. How do I help students develop realistic post-school goals? (August 2014)**

It is very important that educators and parents encourage students to develop and maintain high expectations related to post-school goals. What may seem unrealistic may not be if the student is provided appropriate special education programs and services necessary to achieve those goals. That being said, as students move through the developmental stages of career exploration and development, their goals are expected to change over time based upon their experiences and what they have learned about specific careers. District personnel, parents and others working with students should assist them in shaping and refining their career decisions based upon their strengths, needs, preferences and interests. Using tools such as CareerZone ([www.careerzone.ny.gov](http://www.careerzone.ny.gov)), students begin to identify their career interests; explore a variety of career options; learn about the educational and skill requirements for specific careers; identify what it is about a specific career that intrigues them; and learn about other career options.

In the initial stages of career exploration, students may have limited information about career options and the skills necessary for success in career areas and may identify familiar career paths. In this stage they often participate in job shadowing experiences, begin identifying their interests and exploring familiar career options. In the middle stages of career development, students continue to explore a broader range of career options, participate in a variety of more hands-on work-based learning experiences and begin to gain a general understanding of workforce expectation. In the later stages of career development, students begin to explore more specific career options, including the education and specific skills required for those careers and the job outlook. They participate in more career specific work-based learning experiences and begin relating their own skills and strengths to specific careers. As students move through the stages of career development, they are better able to articulate their own strengths and begin to identify tentative career choices based upon the level of education they intend to pursue and their specific skills and interests.

**4. Can CareerZone’s career plan be printed out so my students and I can review and discuss it in preparation for their annual review? (August 2014)**

Yes. The CareerZone print function has been modified so the Commencement level Career Plan may be printed by the student at any point in time.

**5. Is NYSED’s model career plan provided in format into which student may type? (August 2014)**

Yes. NYSED’s Commencement Level Career Plan is available as a Word document which allows the student to type in the template without formatting issues. This form is Attachment 2 of the June 2013 field memorandum available at <http://www.p12.nysed.gov/specialed/publications/CDOScredential-memo-613.htm>.

## **D. Employability Profile**

### **1. What documentation should districts collect to substantiate the information on a student's employability profile?**

The work skills employability profile is intended to document student attainment of technical knowledge and work-related skills. Documents to validate skills reported on the profile could include, but are not limited to, an employer/teacher review of student work based on learning standards and expectations in the workplace, performance evaluations and observations.

Students must have at least one employability profile completed within one year prior to school exit. If a student is involved in a number of work-based learning experiences and/or is employed part time, he/she may also have additional employability profiles as completed by others knowledgeable about his or her skills (e.g., employer and/or job coach).

### **2. Will the employability profile for the CDOS Commencement Credential serve as the Student Exit Summary?**

No. The employability profile does not meet all of the requirements for the Student Exit Summary as established in section 200.4(c)(4) of the Regulations of the Commissioner of Education. The Student Exit Summary must include a summary of the student's academic achievement and functional performance as well as recommendations to assist the student in meeting his/her post-secondary goals.

The employability profile demonstrates evidence of the student's attainment of each of the commencement level CDOS standards, technical knowledge and work-related skills, work experiences, performance on industry-based assessments and work-related and academic achievements. The information in the employability profile(s) should be considered when completing the Student Exit Summary. Both documents should help the student better understand the impact of his/her disability and articulate individual strengths and needs as well as supports that would be helpful in post-school life.

### **3. May the employability profile be modified? (August 2014)**

Yes. Districts may develop their own or modify the model form as long as it includes the required components. These include documentation of the student's:

- employability skills and experiences;
- attainment of each of the commencement level CDOS learning standards; and
- as appropriate, attainment of technical knowledge and work-related skills, work experiences, performance on industry-based assessments and other work-related and academic achievements.

**4. May the employability profile be considered documentation of student's attainment of CDOS Learning Standards? (August 2014)**

Schools must have documentation that the student has met the commencement level CDOS learning standards. Employability profiles are often completed by individuals such as employers. However, an employability profile can provide evidence of attainment of certain standards. The State has provided a separate form for documentation of a student's attainment of CDOS Learning Standards. See <http://www.p12.nysed.gov/specialed/gradrequirements/CDOS-attainmentchart.htm>.

**5. If a student earns 1s (unsatisfactory) and 2s (needs improvement) on the employability profile, will he/she receive the credential? (August 2014)**

In order to award the CDOS credential, the school must have evidence that the student has satisfactorily completed the requirements for the credential (i.e., career plan, achievement of the CDOS learning standards at the commencement level, and satisfactory completion of the hours of career and technical education and/or work-based learning). The employability profile documents the student's satisfactory completion of work-based learning. Therefore, the principal should determine overall, based upon all the requirements, whether the student has demonstrated work-readiness schools at the entry level in order to be awarded the credential and no single rating or score should be used to make that determination.

**6. Does the employability profile provided to students in registered a NYSED-approved CTE programs meet the employability profile requirement for students earning the CDOS Commencement Credential? (August 2014)**

Yes. The employability profile would meet the requirements of the CDOS Commencement Credential provided that it is completed within one year of school exit by staff knowledgeable about the student's employability skills; documents the student's attainment of commencement level CDOS learning standards in the areas of career development, integrated learning and the universal foundation skills and as appropriate, documents the student's work experiences, attainment of technical knowledge, work-related skills, performance on industry based assessments and other work-related and/or academic achievements.

**7. How will NYSED ensure that the student's scores on the employability profile accurately represent their attainment of the CDOS learning standards and that the CDOS Commencement Credential is not awarded inappropriately? (August 2014)**

See response to question 4 above. It is the school principal's responsibility to ensure that the CDOS Commencement Credential is awarded appropriately. The school must have evidence that the student has engaged in the career planning process, successfully completed relevant instructional and work-based learning

activities, met the commencement level CDOS Learning Standards and has at least one employability profile. The employability profile must be signed by the individual completing the form to assure authenticity and validation.

NYSED will be collecting and analyzing data on the award of the CDOS Commencement Credential as a supplement to a diploma and as a student's only exiting credential. Districts that award the credential to more than 20 percent of the students with disabilities in the cohort and where such credential is not a supplement to a regular high school diploma may be required by NYSED to redirect a portion of their Part B IDEA grant funds for activities 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. The State will make a district-by-district determination as to whether redirection of such funds is warranted.

**8. Will NYSED consider amending the regulations so employability profiles are required to be completed more than once? (August 2014)**

The regulations indicate that at least one employability profile must be completed within one year of a student's exit from high school. As such nothing would preclude a school from providing the student with more than one profile. Schools are encouraged to complete an employability profile for each of the work-based learning experiences in which the student participates to capture skills across a variety of settings and use the employability profile annually as tools to identify areas of need for student-specific instruction.

**E. Documentation**

**1. Must a district maintain an ongoing record of the student's skills in relation to the CDOS learning standards or only the final employability profile and/or career plan?**

The district must have documentation of how students demonstrated achievement of the CDOS learning standards 1, 2 and 3a at the commencement level in order to award the credential. For purposes of the student's permanent record, the district must maintain a copy of the career plan that was in effect during the school year in which the student exits high school and at least one employability profile completed within one year prior to a student's exit from high school.

**2. Districts are required to maintain a copy of the career plan that was in effect during the school year that the student exits high school in the student's permanent record. How can the final career plan be maintained in the student's record for those using CareerZone as a career planning tool?**

Students who created a career plan using CareerZone may print a copy of their career plan from CareerZone. This is the same career plan as NYSED's model commencement level career plan.

**3. What documentation should be included in the transcript of the student earning the CDOS Commencement Credential?**

The transcript must identify that the student earned the NYS CDOS Commencement Credential and document the CTE coursework and number of hours of work-based learning experiences the student completed.

**4. Where in the IEP should it indicate that a student is working towards the CDOS Commencement credential? (August 2014)**

Documentation that the student is working toward the CDOS Commencement Credential does not need to be, nor do we recommend that it be, documented in the student's IEP. School districts should provide all students with appropriate career planning, coursework instruction and work-based learning activities that would provide all students with disabilities the opportunity to exit with the credential. By indicating in the IEP that a particular student is working toward the credential may have the unintended consequence of 'tracking' the student to exit with the credential in lieu of a regular high school diploma.

**5. Will the State issue a model certificate for the CDOS Commencement Credential? (August 2014)**

Each school is responsible for developing a certificate at the local level that is similar in form to the district diploma. The certificate must not use the term "diploma" and it must indicate that the NYS CDOS Commencement Credential is endorsed by the NYS Board of Regents as a certificate of readiness for entry level employment. The model certificate for award of the NYS CDOS Commencement Credential can be found at <http://www.p12.nysed.gov/specialed/gradrequirements/home.html>.

**6. If a student does not meet the requirements to earn a NYS CDOS Commencement Credential and does not receive a diploma, does the student receive any other type of document upon graduation (i.e., certificate of attendance or other recognition that they have worked toward their annual goals of their individualized education program)? (August 2014)**

Nothing in State law, regulation or guidance prevents a school from issuing certificates of attendance or recognition. This is a local decision made by the school district.

## **F. National Credentials**

### **1. Can a district offer coursework and training to prepare a student to earn one of the National Work Readiness Credentials?**

Yes. Districts can offer coursework and/or work-based learning experiences that will prepare a student for the assessment necessary to earn one of the National Work Readiness Credentials. Under Option 2, a district may award a student this credential if the student has met the requirements for one of the nationally recognized work readiness credentials including, but not limited to:

- National Work Readiness Credential;
- SkillsUSA Work Force Ready Employability Assessment;
- National Career Readiness Certificate WorkKeys - (ACT); and
- Comprehensive Adult Student Assessment Systems Workforce Skills Certification System.

To earn any of these National Work Readiness Credentials, students must pass the assessment required of that credential. Each of the assessments measures slightly different skills and has a fee associated with it. Each also provides instructional materials and resources to assist in preparing a student for the assessment.

Although a school district may provide individual students the option of earning the NYS CDOS Commencement Credential by meeting the requirements for one of the nationally recognized work readiness credentials, the national credential option should not be the only option available to students in the district to earn the credential.

### **2. If a district offers course(s) to prepare a student for the assessment for one of the National Work Readiness Credentials, would that be considered work-based learning?**

Whether the experience would be considered work-based learning is dependent upon the nature of the experience. Section 100.6(b)(1)(ii)(2) of the Regulations of the Commissioner of Education indicate work-based learning experiences include, but are not limited to, job shadowing, community service, volunteering, service learning, senior project(s) and/or school based enterprises. Such experiences must be provided consistent with NYSED guidelines. For additional information on work-based learning programs, see <http://www.p12.nysed.gov/cte/wbl/home.html>.

### **3. Must students participate in work-based learning experiences if they are earning the credential through successful completion of one of the National Work Readiness Credentials?**

No. Students would not be required to participate in work-based learning experiences unless otherwise required for successful completion of the national credential.

## **G. Students Exiting Before July 2015 and Transfer Students**

- 1. For students exiting prior to July 2015, the decision about whether or not to award the CDOS credential is up to the principal with input from relevant faculty. What kind of evidence is required to demonstrate that the student has achieved each of the commencement level CDOS learning standards?**

For students with disabilities who exit from high school prior to July 1, 2015, the CDOS Commencement Credential may be awarded to a student who has not met all of the requirements, provided that the school principal, in consultation with relevant faculty (e.g., guidance counselors, teachers, job coaches, CTE teachers and/or others knowledgeable about the student's skills), has determined that the student has otherwise demonstrated knowledge and skills in the commencement level CDOS learning standards related to career planning, integrated learning and the universal foundation skills. An award of this credential means that the student is ready for entry-level employment and therefore, the principal must have evidence that the student has successfully completed relevant instructional and work-based learning activities during the student's secondary school years that demonstrates the student has readiness skills for entry-level employment.

There are many ways a student can demonstrate attainment of all of the CDOS standards. Successful completion of the sample tasks provided for the CDOS standards while the student is engaged in CTE and other coursework and work-based learning experiences provide evidence that the student has met that standard. However, up until June 30, 2015, the total hours of the CTE coursework and/or work-based learning activities may be less than the equivalent of two units of study (216 hours).

- 2. How does a principal determine whether or not a student who transfers from another school district meets the requirements of the CDOS Commencement Credential?**

For students with disabilities who transfer from another school district within the State or another state, the principal must, 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 of the CDOS Commencement Credential.

When making the determination as to whether the student meets the requirements of the CDOS Commencement Credential in these situations, the principal, in consultation with relevant faculty should consider the following:

- Documentation that the student has engaged in career planning and exploration. Minimally, all students should have a career plan;
- Evidence that the student has attained each of the commencement level CDOS learning standards;

- The extent to which the student has successfully completed instruction, courses of study and transition activities at the secondary level related to the student's post-secondary employment goals; and
- An evaluation of the student's employability skills as documented in the employability profile of the student.