

# New York State (NYS) Career Development and Occupational Studies (CDOS) Commencement Credential

## Questions and Answers

September 2018

*The following questions and answers have been updated and reorganized to align with the [2016 regulatory changes](http://www.regents.nysed.gov/common/regents/files/316p12a1.pdf) (<http://www.regents.nysed.gov/common/regents/files/316p12a1.pdf>) that expanded the opportunity to all students to earn the NYS CDOS Commencement Credential and established the “4+CDOS” pathway to a diploma for all students. The [June 2016 Field Advisory](http://www.nysed.gov/common/nysed/files/programs/curriculum-instruction/cdos-field-memo-june-2016.pdf) outlining this change can be found at <http://www.nysed.gov/common/nysed/files/programs/curriculum-instruction/cdos-field-memo-june-2016.pdf>. The Q & A is organized by topics with the questions that only apply to students with disabilities at the end of each section.*

### A. ELIGIBILITY

#### All Students

- A1. Who is eligible to earn a Career Development and Occupational Studies (CDOS) Commencement Credential?**

Any student, who meets all of the credential requirements pursuant to section 100.6(b) of the Regulations of the Commissioner of Education, is eligible to earn a CDOS Commencement Credential, except for those students with disabilities deemed eligible for a Skills and Achievement Commencement Credential.

- A2. Can a student receive the CDOS Commencement Credential if he/she continues in high school beyond four years?**

Yes.

- A3. 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. Students who are unable to earn a regular diploma may leave school with the NYS CDOS Commencement Credential as their only exiting credential.

**A4. 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?**

The board of education or the board of trustees of each school district must establish policy and adopt procedures to allow any student who has been awarded a Skills and Achievement Commencement Credential or the CDOS Commencement Credential, but has not otherwise qualified for a Regents or local high school diploma, to participate in the graduation ceremony of the student's high school graduating class (i.e., the twelfth-grade class with which such student entered into ninth grade) and all related activities. School districts must also provide annual written notice to all students and their parents or guardians about the graduation policy and procedures adopted by the school district.

**A5. May a student who earns the CDOS Commencement Credential as his/her only exiting credential return to school to pursue a high school diploma?**

Yes. The CDOS Commencement Credential is not considered equivalent to receipt of a high school diploma and does not terminate a student's entitlement to a free public education. Such student continues to be eligible to attend the public school without payment of tuition until the student has earned a Regents or local high school diploma or until the end of the school year in which such student turns age 21, whichever shall occur first.

**A6. May a student who has graduated with a high school diploma return to school to work toward the CDOS Commencement Credential?**

No. Receipt of a high school diploma ends a student's entitlement to free public education.

**A7. How can a student use the CDOS Commencement Credential to meet graduation requirements for a high school diploma?**

Beginning June 2016 and thereafter, under the new "4+CDOS" pathway option, any student may graduate with a high school diploma if such student meets the graduation course and credit requirements; passes four required Regents Exams or Department approved alternative assessments (one in each of the following subjects: English, mathematics, science, and social studies); and meets the requirements to earn the NYS CDOS Commencement Credential.

**A8. How can districts ensure that the CDOS Commencement Credential is awarded with fidelity, consistent with the 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 to ensure that the student has met the requirements for award of the credential:

- Does the student have a **career plan** in which he/she participated in the development? Does the school 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 has demonstrated achievement of the **CDOS Learning Standards** (1, 2 and 3a) 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 the employability profile 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?
- Is the student **graduating** with a regular high school diploma or has the student **attended school for at least 12 years**, excluding kindergarten?

**A9. How are students that leave school with the New York State (NYS) CDOS Commencement Credential or the Skills and Achievement Commencement Credential as their only exiting credential counted in “high school completers” and “noncompleter” data? Do they affect a district’s graduation and drop-out rate?**

Students leaving school with the CDOS or the Skills and Achievement Commencement Credential are included in the “Non-Degree Completers” category. They are not counted as graduates or drop outs. For additional information or to submit questions about reporting data for school districts, public schools, charter schools, and nonpublic schools in New York State contact the [Office of Information and Reporting Services](https://datasupport.nysed.gov/hc/en-us/categories/201517666-Other-FAQ-Help-Centers-by-Content-Area) (<https://datasupport.nysed.gov/hc/en-us/categories/201517666-Other-FAQ-Help-Centers-by-Content-Area>).

**A10. What notification is required if a student exits with the CDOS Commencement Credential in the absence of a high school diploma?**

Pursuant to section 100.6(c) of the Regulations of the Commissioner of Education, a student whose only exiting credential is the CDOS Commencement Credential (i.e., the student has not yet earned a diploma) and who is less than 21 years of age, the credential must be accompanied by a written statement of assurance that the student named as its recipient shall continue to be eligible to attend the public schools of the school district in which the student resides without the payment of tuition until the student has earned a Regents or local high school

diploma or until the end of the school year in which such student turns age 21, whichever occurs first.

Additionally, for a student with a disability, pursuant to section 200.5(a)(5)(iii) of the Regulations of the Commissioner of Education, prior to the student's exiting with a CDOS Commencement Credential, the parent must be given [prior written notice](http://www.p12.nysed.gov/specialed/formsnotices/PWN/form.htm) (<http://www.p12.nysed.gov/specialed/formsnotices/PWN/form.htm>) indicating that the student continues to be eligible for a free appropriate public education until the end of the school year in which the student turns age 21 or until the receipt of a Regents or local high school diploma.

### **Students with Disabilities**

#### **A11. Can a student who 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?**

Yes. A student with a disability, who meets the definition of a student with a severe disability in section 100.1(t)(2)<sup>1</sup> of the Regulations of the Commissioner of Education, may be recommended by the committee on special education (CSE) to participate in the State's alternate assessment only for selected subject areas. (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 credential requirements, including achievement at the commencement level of the State's CDOS Learning Standards.

### **B. INSTRUCTION TOWARDS THE CDOS LEARNING STANDARDS AND OPPORTUNITIES TO EARN A DIPLOMA**

#### **All Students**

#### **B1. If a student does not meet all standards (i.e., 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 a student has demonstrated commencement level knowledge and skills relating to the CDOS learning standards<sup>1</sup>, 2 and 3a (i.e., career development, integrated learning and the universal foundation skills) to award this credential to the student. However, it is

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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.

not necessary for the student to complete all the sample tasks to demonstrate attainment of that standard.

**B2. May a student work only towards attainment of the CDOS Commencement Credential without participating in coursework and the assessments that would lead to a high school diploma?**

No. Students should not be placed on a “separate track” to receive the CDOS Commencement Credential as their only exiting credential and at no point should a decision be made that a student stops working toward a high school diploma in order to concentrate only on earning this credential.

**B3. How will students have time to work toward both the CDOS Commencement Credential and a high school diploma?**

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) to meet the work-based learning requirements to earn the CDOS Commencement Credential. 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.

All students beginning in grade 9 should have access to CTE coursework. NYSED’s [Resource Guide with Core Curriculum](http://www.p12.nysed.gov/cte/cdlearn/documents/CDOS-intro.pdf) (<http://www.p12.nysed.gov/cte/cdlearn/documents/CDOS-intro.pdf>) includes examples of how the CDOS standards can be presented in the classroom. 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.

In addition, under Option 2, a student has the opportunity to earn the CDOS Commencement Credential if he/she has met the requirements for one of the nationally recognized work readiness credentials<sup>2</sup> in lieu of completing the 216 hours of CTE coursework and work-based learning.

**Students with Disabilities**

**B4. If a student with a disability has completed the CTE coursework and work-based learning requirements to earn a CDOS Commencement Credential,**

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<sup>2</sup> Pursuant to section 100.6(b)(4)(ii) of the Regulations of the Commissioner of Education on or after April 3, 2017, students who seek to use Option 2 to meet the requirements for the CDOS Commencement Credential must pass a work-readiness assessment approved by the Commissioner.

**and remains in or returns to school, must districts continue to provide transition planning and services?**

Yes. A student with a disability is entitled to transition planning and activities until he or she exits high school. In addition, the hours of instruction and work-based learning requirements to earn the CDOS Commencement Credential is the 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 local or Regents diploma.

- B5. 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 the credential is awarded to more than 20 percent of the students with disabilities in the district cohort as the student's only exiting credential, NYSED may, at its discretion, determine that the reason for these numbers is that the district failed to provide such 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.

### **C. WORK-BASED LEARNING**

#### **All Students**

- C1. If a student achieves the required 216 equivalent hours through coursework, can the individual "opt out" of the 54 hours of work-based learning?**

No. A student must complete a minimum of 54 hours of work-based learning and cannot "opt out" of this requirement if he/she is earning the credential through Option 1.

- C2. Does a student automatically earn the required 54 WBL hours when they are enrolled in a CTE course? What about an approved CTE program?**

No. A CTE course or program of study in and of itself does not count as work-based learning. However, students participating in a CTE course(s) should have

work-based learning opportunities made available to them. Work-based learning can include an array of different activities along a continuum; from short-term, introductory types of experiences to longer-term, more intensive ones, including paid work experiences and formal training. Ultimately it is the responsibility of the school to provide the opportunities, verify, document and maintain student hours for the CDOS credential work experience requirement. Information regarding work-based learning requirements is available on the [CTE website \(http://www.p12.nysed.gov/cte/wbl/home.html\)](http://www.p12.nysed.gov/cte/wbl/home.html).

Students in an approved CTE program are required to have work-based learning opportunities available to them. Only the hours that the student independently demonstrates mastery of skills that meets industry standards and produces a product and/or provides a service, even when working with other students in a team project, can count toward the required WBL hours (e.g., a student in a culinary program following a recipe and using proper measuring techniques along with precise and consistent vegetables cuts to produce a soup that will be served for a teacher luncheon or to an outside group that is coming in to the school for a meeting). If working on a team project, the student must actively participate in the project by demonstrating various skills as mentioned above and not just bring the supplies, tools and materials to the job site or assist other students to be credited with the WBL hours. Practice skills/skills development activities and modeling safety in the classroom cannot be counted as WBL hours.

**C3. Do students need to participate in registered work-based learning programs to complete the 54 minimum hours required for the CDOS Commencement Credential?**

No. Students may participate in locally approved work-based learning experiences that do not require a certified work-based learning coordinator to meet the work-based learning requirement for the CDOS Credential such as:

- Job Shadowing
- Community Based Work Program
- School Based Enterprises
- Community Service/volunteering
- On-Site Projects (that produce a product or provide a service)

Schools must ensure that the students placed in local work-based learning experiences are provided with proper safety and health training.

The following work-based learning programs must be registered with NYSED and must be supervised by a certified work-based learning coordinator:

- Career Exploration Internship Program (CEIP)
- General Education Work Experience Program (GEWEP)
- Work Experience and Career Exploration Program (WECEP)
- Career and Technical Education Cooperative Work Experience Program (CO-OP)

Information regarding work-based learning requirements and the application for a NYSED registered program is available at [the Work-Based Learning Programs webpage \(http://www.p12.nysed.gov/cte/wbl/home.html\)](http://www.p12.nysed.gov/cte/wbl/home.html).

**C4. Do teachers providing work-based learning experiences need to have a specific certification such as a work-based learning extension?**

Teachers 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). Teachers supervising **locally approved** work-based learning experiences, 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.

**C5. Is safety training a required component for the CDOS Commencement Credential?**

No. However, prior to arranging for a work-based learning activity for a student, the district must ensure that the site has been approved for safety and that it has arranged for appropriate supervision of the student. While there is no required number of hours or amount of safety instruction students should receive, health and safety instruction appropriate for the work-based learning experience should be provided by the school before a student's participation in the experience with additional training provided as appropriate at the worksite. The [NYS Work-based Learning Manual \(http://www.p12.nysed.gov/cte/wbl/home.html\)](http://www.p12.nysed.gov/cte/wbl/home.html) recommends that students receive, as appropriate, instruction in general health and safety topics including:

- Hazardous/prohibitive occupations for minors;
- Identifying occupational hazards;
- Child Labor Laws;
- Common sense health and safety precautions;
- Slips and falls – injury prevention;
- Hazardous materials and chemicals;
- Threats – terrorists, criminal acts;
- Violence in the workplace;
- Safety training specifically related to the occupation or work-based learning experience; and
- Sexual harassment and bullying.

The [National Institute for Occupational Safety and Health \(http://www.cdc.gov/niosh/talkingsafety/\)](http://www.cdc.gov/niosh/talkingsafety/) provides information about teaching young workers about job safety and health.



While not specific to participation in work-based learning experiences, the curriculum for all students must include instruction in highway safety and traffic regulation [8 NYCRR §100.2(c)(5)] and fire drills and fire and arson prevention, injury prevention and life safety education [8 NYCRR §100.2(c)(6)].

**C6. What components of a career-focused research project (senior project) can be used to meet the required work-based learning hours for the CDOS Commencement Credential?**

Students may be granted work-based learning hours for participating in job shadowing, conducting interviews with professionals currently working in a career; and the student's final presentation for his/her senior project.

The number of hours associated with each of these activities must be outlined, monitored, supervised and documented at the district level. The career-focused (senior project) may be completed anytime in grades 9-12. *The research project (senior project)* should not be a student's only means of obtaining work-based learning experiences necessary for award of the CDOS Commencement Credential. Additional information regarding the career-focused research project (senior project) can be found in the [NYS Work-based Learning Manual \(http://www.p12.nysed.gov/cte/wbl/home.html\)](http://www.p12.nysed.gov/cte/wbl/home.html).

**C7. Can a student use part time employment outside of school to fulfill the work-based learning requirement for the CDOS Credential?**

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 credential unless the school district enters into an agreement with the business that, ensures the employer is complying with the Laws Governing the Employment of Minors document from the NYS Department of Labor and defines the educational aspects of student's work experience and outlines the school, student and employer's responsibilities. All 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 [the Work-Based Learning Programs webpage \(http://www.p12.nysed.gov/cte/wbl/home.html\)](http://www.p12.nysed.gov/cte/wbl/home.html).

**C8. Can middle school experiences/hours count towards the credential?**

Work-based learning completed in middle school cannot be counted towards the CDOS Commencement Credential, unless these hours are associated with a credit bearing high school CTE course.

**C9. Can coursework taken in the summer prior to entering grade nine that provides work-based learning experiences count toward the 216 hours of required coursework and work-based learning?**

A student may begin accumulating the 216 hours of coursework and/or work-based learning during the summer session between middle and high school only if he or she has completed the requirements for eighth grade by June and has been promoted to ninth grade.

**C10. What are the benefits or incentives for employers to host students for work-based learning opportunities?**

Work-based learning programs benefit employers by:

- providing a source of skilled and motivated future employees who understand workforce expectations;
- reducing their future recruitment and training costs;
- strengthening the labor supply;
- establishing connections between industry professionals and education providers;
- providing an opportunity to communicate job-specific proficiencies and general work force expectations to educational personnel so students are better prepared for the workforce;
- developing and/or strengthening their relationship with the community through their connection to public education; and
- promoting a positive public image of their business

**C11. Can work-based learning experiences provided as part of a summer youth employment program (e.g., Summer Youth Employment programs (DOL)); or for students with disabilities, summer youth work experiences (ACCES-VR) or Pathways to Employment (OPWDD), count towards the work-based learning requirements for the CDOS Commencement Credential?**

Yes. Paid or unpaid employment in a summer youth work program may be considered a community-based work program if such experiences are provided consistent with SED guidelines, under the supervision of the district and are documented in a student's transcript.

**Students with Disabilities**

**C12. Are students with a disability required to have a job coach for work-based learning experiences?**

No. Whether a student requires supports or on the job training (e.g., a job coach) must be determined on an individual basis and documented in the student's IEP. A job coach is a person who provides on the job training and helps students that have more intense needs and require more direct supervision to work at a job site.

In determining a student's need for a job coach the CSE should consider if the student needs:

- 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
- help to 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.

Teaching assistants may accompany and/or monitor students during community-based work experiences under the supervision of a teacher who may or may not be present at the work site, and often fulfill the role of job coach. It is recommended that an individual serving as a job coaches complete a job coach training program. 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 have such individuals perform such duties.

**C12. Can a district arrange for students with disabilities to participate in transition services, specifically work-based learning experiences during or outside of the school day that is provided by a community organization? If so, can that experience be counted toward the work-based learning requirement for the CDOS Commencement Credential?**

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 (<http://www.p12.nysed.gov/resources/contractsforinstruction/qa.html>). If the community agency programs are not an approved program pursuant to Education Law section 4401(9), the district may not submit a STAC for tuition reimbursement of such programs and services.

**C13. Should school districts disclose information about a student's disability when developing a Memorandum of Agreement (MOA) or "Memorandum of Understanding (MOU) with an employer for a student's participation in a work-based learning experience?**

A “Memorandum of Agreement” or “Memorandum of Understanding” outlines the responsibilities of the student, employer, parent/guardian, and school/coordinator, all of whom should sign to confirm their support of the agreement. Information regarding the student’s disability should be disclosed only to the extent necessary to ensure the student receives the appropriate accommodations, supports and services.

## **D. CAREER AND TECHNICAL EDUCATION COURSEWORK**

### **All Students**

**D1. Does the requirement to use CTE coursework, towards the 216 required hours, mean that a student must be enrolled in CTE courses or programs of study?**

To earn the CDOS Credential, a student must be enrolled and successfully complete the equivalent of two units of study or (216 hours)<sup>3</sup> of CTE course(s) and/or CTE programs of study taught by a certified CTE teacher. The CTE coursework(grade 9-12) can be courses that are approved by the local board of education or are approved by NYSED through the CTE program approval process\*. 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).

**D2. 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, the CTE coursework (grade 9-12) can be courses that are approved by the local board of education or are approved by NYSED through the CTE program approval process. Such courses must:

- be aligned to the State 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
- 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:

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<sup>3</sup> 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.

- 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 Education.

CTE programs of study that have been approved by NYSED through the CTE program approval process are in the following content areas:

- Agricultural;
- Business and Marketing;
- Family and Consumer Sciences;
- Technology Education;
- Health Sciences; and
- Trade and Technical Education

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

**D3. Can 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, taught by a certified CTE teacher, and/or work-based learning experiences. CTE coursework (grade 9-12) can be courses that are approved by the local board of education or by NYSED through the CTE program approval process.

**D4. 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 to meet the requirement for award of the credential?**

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

**D5. If a student takes a high school CTE course in eighth grade and it is recorded on the high school transcript, will this credit count towards the CDOS Commencement Credential?**

Yes. Successful completion of an accelerated CTE course by an eighth-grade student, pursuant to section 100.4(d) of the Regulations of the Commissioner of Education, is a high school credit bearing course and as such could count toward the required hours for the CDOS Commencement Credential. However, CTE course instruction in technology education and home and career skills required for the State intermediate learning standards does not count as CTE coursework to meet the requirement for the credential.

## **E. CAREER PLAN**

### **All Students**

**E1. When should a student begin a Career Plan?**

Students working toward this credential should begin commencement level career planning in grade nine. Districts are encouraged to engage all students in career planning early on in the 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](http://www.p12.nysed.gov/cte/careerplan) (<http://www.p12.nysed.gov/cte/careerplan>) beginning in kindergarten which districts may but are not required to use. 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](http://www.careerzone.ny.gov) ([www.careerzone.ny.gov](http://www.careerzone.ny.gov)).

**E2. 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 should be reviewed annually to assist in planning courses of study, work-based learning experiences and graduation pathways. For students with disabilities, the career plan must be considered in the annual review 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.

**E3. How does the career plan encourage students to develop “realistic” career goals?**

It is very important that educators and parents encourage students to develop and maintain high expectations related to career goals. As students move through the stages of career awareness and exploration, and as appropriate, career development and application, 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 will 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.

Through the process of annually reviewing and revising the career plans, as students move through the stages of career development, they will be 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.

**E4. Does NYSED provide a model career plan?**

Yes. [NYSED's Commencement Level Career Plan \(http://www.p12.nysed.gov/specialed/publications/CDOScredential-att2.pdf\)](http://www.p12.nysed.gov/specialed/publications/CDOScredential-att2.pdf) is a model career plan which allows the student to type in the template without formatting issues.

## **F. EMPLOYABILITY PROFILE**

### **All Students**

**F1. Who is responsible for completing the employability profile?**

The employability profile is completed by the school or others personally knowledgeable about the student's skills (e.g., general education teacher, special education teacher, CTE teacher, work experience coordinator, employer, job coach, or extracurricular club advisor etc.).

**F2. 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.

The regulations require that at least one employability profile 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 a tool to identify areas of need for student-specific instruction.

**F3. May the employability profile be modified?**

Yes. Districts may develop their own form 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.

**F4. May the employability profile be considered documentation of student's attainment of CDOS Learning Standards?**

Schools must have documentation that the student has met the commencement level CDOS learning standards. An employability profile can provide evidence of attainment of certain standards. The performance indicators in the employability profile are cross-walked to the [CDOS learning standards](http://www.p12.nysed.gov/specialed/publications/CDOScredential-att4.pdf) (<http://www.p12.nysed.gov/specialed/publications/CDOScredential-att4.pdf>).

Schools can use this crosswalk to assist them in determining student attainment of the CDOS learning standards. Meeting or exceeding expectations on specific performance skills on the employability profile provides evidence of attainment of the CDOS learning standards. Award of the CDOS Commencement Credential signifies readiness for entry-level employment and, as such, those awarding the credential to the student must have documentation to ensure that the student has met the commencement level CDOS learning standards and is ready for entry-level employment. The State has provided the model form [Evidence of Attainment of the Commencement Level Career Development and Occupational Studies \(CDOS\) Learning Standards](http://www.p12.nysed.gov/specialed/gradrequirements/CDOS-attainmentchart.htm) (<http://www.p12.nysed.gov/specialed/gradrequirements/CDOS-attainmentchart.htm>) to assist schools in documenting student's attainment of CDOS Learning Standards.



**F5. If a student earns 1s (unsatisfactory) and 2s (needs improvement) on the employability profile, will he/she receive the credential?**

In order to award the CDOS credential, a 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 and must be signed by the individual completing the form to assure authenticity and validation. The principal is responsible for determining if, based on all the documentation, the student has demonstrated work-readiness skills at the entry level to appropriately award the credential. No single rating or score should be used to make this determination.

**Students with Disabilities**

**F6. 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.

**G. DOCUMENTATION**

**All Students**

**G1. 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.

**G2. Will the State issue a model certificate for the CDOS Commencement Credential?**

Each school is responsible for developing a certificate at the local level that is similar in form to the district diploma. The certificate cannot use the term “diploma” and 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. NYSED has developed a [model certificate](http://www.p12.nysed.gov/specialed/gradrequirements/home.html) (<http://www.p12.nysed.gov/specialed/gradrequirements/home.html>) for award of the NYS CDOS Commencement Credential that district’s may but are not required to use.

**G3. 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 exiting school (i.e., certificate of attendance or other recognition)?**

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

**G4. Does the SED model form “Evidence of Attainment of the Commencement Level Career Development and Occupational Studies (CDOS) Learning Standards” or similar document need to be completed and placed in the student’s record to document the his or her attainment of the CDOS Learning Standards?**

The school district must have evidence that the student has attained the commencement level knowledge and skills related to the CDOS learning standards. It is up to local discretion how this evidence is documented. SED’s model form “Evidence of Attainment of the Commencement Level Career Development and Occupational Studies (CDOS) Learning Standards” is provided as a tool to assist districts in tracking student attainment of the commencement level CDOS learning standards as demonstrated in coursework and work-based learning experiences in which the student participated over the course of high school.

**G5. How long does documentation need to be kept showing the student has met the requirements for the CDOS Commencement Credential?**

A copy of the career plan 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 high school exit [8 NYCRR §100.6(b)(1)(iii)] must be maintained in the student’s permanent file [8 NYCRR §100.6(b)(1)(i) and (iii)]. Award of the CDOS Commencement Credential must be documented in the student’s transcript which also must be maintained in the student’s permanent file [8 NYCRR §100.6(b)(4)].

Additional information regarding student records retention can be found in the [Records Retention and Disposition Schedule-ED-1](http://www.archives.nysed.gov/a/records/mr_pub_ed1.pdf) [http://www.archives.nysed.gov/a/records/mr\\_pub\\_ed1.pdf](http://www.archives.nysed.gov/a/records/mr_pub_ed1.pdf).

Consistent with the Records Retention and Disposition Schedule-ED-1: documents related to participation in work-based learning experiences should be retained as follows:

- Memorandums of agreement, training plans, parent/guardian permission forms, student's time sheets and work summaries, and similar work-based learning records: six (6) years from when the student graduates or would have normally graduated from school;
- Student journals: one (1) year after the end of the school year; and
- Copy of Employment Certificates (working papers): zero (0) years after student attains age 21. Additional information specific to retention of records related to work-based learning experiences is in the [New York State Work-Based Learning Manual](http://www.p12.nysed.gov/cte/wbl/home.html) (<http://www.p12.nysed.gov/cte/wbl/home.html>).

### **Students with Disabilities**

**G6. Where in the IEP should it indicate that a student is working towards the CDOS Commencement credential?**

Documentation that the student is working toward the CDOS Commencement Credential does not need to be, nor is it recommended 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.

**G7. For a student with a disability exiting high school with the CDOS Commencement Credential in the absence of a regular high school diploma, is there an official NYS letter of written notice that states that the student remains eligible for a free appropriate public education (FAPE) until he/she earns a Regents or local high school diploma or until the end of the school year in which the student turns age 21?**

Yes. Prior to a student exiting with a CDOS Commencement Credential, [prior written notice](http://www.p12.nysed.gov/specialed/forms_notices/PWN/home.html) ([http://www.p12.nysed.gov/specialed/forms\\_notices/PWN/home.html](http://www.p12.nysed.gov/specialed/forms_notices/PWN/home.html)) must be given to the student's parents indicating that the student continues to be eligible for a free appropriate public education until the end of the school year in which the student turns age 21 or until the receipt of a Regents or local diploma. [8 NYCRR §200.5(b)(3)(iii)]

## **H. WORK READINESS CREDENTIALS**

### **All Students**

- H1. Can a district offer coursework and training to prepare a student to take the assessment 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.

Each of these 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 under Option 2 this should not be the only option available to students in the district to earn the credential.

- H2. Must students participate in work-based learning experiences if they are earning the credential through successful completion of one of the Work Readiness Credentials?**

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

- H3. Can parents pursue attainment of a national work readiness credential on their own with their child, outside of the school day, to meet the requirements to earn the CDOS Commencement Credential?**

To award the CDOS Commencement Credential through Option 2, the district must have documentation that the student met the requirements for one of the work readiness credentials. Public school districts must offer students the option to earn a CDOS Commencement Credential. As such, parents may but would not be required to pursue attainment of a credential under Option 2 for their child on their own.

## **I. TRANSFER STUDENTS**

### **All Students**

- I1. How does a principal determine whether a student who transfers from another school district meets the requirements of the CDOS Commencement Credential?**

For students 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.

**J. Exception to the Option 1 Minimum Requirements for the  
2017-2018 and 2018-2019 School Years for Purposes of Eligibility of  
the Superintendent Determination Option**

**Students with Disabilities**

**J1. If a student who has not met all the requirements is awarded the NYS CDOS Commencement Credential under the exception for the 2017-18 or 2018-19 school years, for purposes of eligibility for the Superintendent Determination option, can he/she use the credential for the 4 + CDOS pathway to earn a local diploma?**

No. A student who is awarded the CDOS under the exception for the 2017-18 or 2018-19 school years may not use the credential to meet the requirements for the CDOS pathway to a local or Regents diploma. Such student must either pass a +1-pathway assessment or, if the student was not successful at demonstrating his/her proficiency on a Regents pathway examination (e.g., one additional Regents examination in a different course in math, science or social studies), a superintendent review would be needed for that subject area.

**J2. Can the CDOS Commencement Credential requirements be used for both ELA and Math Regents examinations eligibility condition(s) for the Superintendent Determination option?**

Yes. On or after December 12, 2017, a student who was unable to achieve a minimum score of 55 or did not initiate an appeal of a score of between 52 and 54 on the ELA and/or Math Regents examinations may use the NYS CDOS Commencement Credential requirements to be considered an eligible student for the Superintendent Determination. If a student was unable to meet the ELA and/or math threshold condition, the superintendent must conduct a review to determine whether such student has otherwise demonstrated proficiency in the knowledge, skills and abilities in that subject area (ELA and/or math), in addition to any other subject areas where the student was not able to demonstrate his/her proficiency of the State's learning standards as measured by the corresponding Regents examination(s) required for graduation.

**J3. Can a district award the CDOS Commencement Credential under the exception to the minimum requirements for the 2017-18 or 2018-19 school years, to a student who is not being considered for a local diploma through the Superintendent Determination option?**

No. The exception to the minimum requirements for an award of the CDOS Commencement Credential is only for purposes of eligibility for the Superintendent Determination option for students who are otherwise eligible to graduate in either the 2017-2018 school year or the 2018-2019 school year. A district may not use the exception period to award a CDOS Commencement Credential to a student who is not using the CDOS Commencement Credential to meet the ELA and/or mathematics Regents examination(s) eligibility condition(s) for the Superintendent Determination option.