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

Frequently Asked Questions

Updated June 15, 2023

TABLE OF CONTENTS

Overview 3
Eligibility 4
Instruction Towards the CDOS Learning Standards And Opportunities To Earn a Diploma 7
Work-Based Learning 9
Career and Technical Education Coursework 15
Career Plan 17
Employability Profile 18
Documentation 20
Work Readiness Credentials 22
Transfer Students 23

OVERVIEW

The following document addresses frequently asked questions from the field regarding the NYS CDOS Commencement Credential. The answers are organized by topics with the questions that apply to students with disabilities at the end of each section. This document supersedes any previously issued FAQ on this topic. This document will be periodically updated.

If after reading this guidance document, there are additional questions, please contact the appropriate office below:

- Questions regarding graduation requirements, Office of Standards and Instruction, emscgradreq@nysed.gov
- Questions regarding Career and Technical Education (CTE) coursework or work-based learning, Office of Career and Technical Education, emsccte@nysed.gov
- Questions regarding students with disabilities, Office of Special Education, speced@nysed.gov

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 they continue in high school beyond four years?

Yes.

A3. Can a student be awarded the CDOS Commencement Credential if they have met all of the criteria for the CDOS Commencement Credential; attended school for at least 12 years, excluding kindergarten; have not yet earned a diploma; and are 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 their 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 their 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 "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 they 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? (Note: Students must complete a minimum of 54 hours of work-based learning; however, all 216 hours could be work-based learning.)
- Does the student have at least one employability profile completed within their last year of high school by an individual knowledgeable about their 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 Commencement Credential or the Skills and Achievement Commencement Credential are included in the "Non-Degree Completers" category. They are not counted as graduates or dropouts. 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.

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, when a student's only exiting credential is the CDOS Commencement Credential (i.e., the student has not yet earned a diploma) and the student 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 exiting with a CDOS Commencement Credential, the parent or guardian must be given prior written notice 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)[1] of the Regulations of the Commissioner of

[1] 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

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 identifies few instances when this has occurred; 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, are they 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 1, 2 and 3a (i.e., career development, integrated learning, and the universal foundation skills) to award this credential to the student. However, it is 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 stop 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/career-focused research 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

---

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.

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 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 they have met the requirements for one of the nationally recognized work readiness credentials[2] in lieu of completing the 216 hours of CTE coursework, of which 54 hours must be work-based learning, or utilizing the full 216 hours of work-based learning option instead of two units of CTE coursework..

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 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 they exit high school. In addition, the hours of instruction and work-based learning requirements to earn the CDOS Commencement Credential are 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 (2 unit) 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

[2] 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.

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 CTE 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 they are 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 a NYSED-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 or program of study 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 and 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.

Students in a NYSED-Approved CTE program are required to have work-based learning opportunities available to them and for schools/BOCES receiving Perkins funding, student attainment of a minimum of 54 hours of work-based learning is a program quality indicator. 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 culinary student following a recipe and using proper measuring techniques and precise/consistent vegetable cuts to produce a soup for teacher luncheon or outside consumer). 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 work-based learning hours. Practice of 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 Commencement Credential such as:

- Job Shadowing
- Community Based Work Program
- School Based Enterprises
- Community Service/volunteering
- Industry-Based 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)
- Career and Technical Education Cooperative Work Experience Program (CO-OP)

Information regarding work-based learning requirements and the application for a NYSED-registered program are available on the Work-Based Learning Programs webpage.

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 the extension of Coordinator of Work-Based Learning Programs. CO-OP experiences must be supervised in coordination with the CTE teacher from the content area from which the CO-OP experience is concentrated.

For teachers supervising locally approved work-based learning experiences, it is highly recommended but not required that they obtain the Coordinator of Work Based Learning Programs extension.

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

While not mandated, safety training is highly encouraged. 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 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 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 as outlined in Section 100.2(c)(5) of the Regulations of the Commissioner of Education and fire drills and fire and arson prevention, injury prevention and life safety education as outlined in Section 100.2(c)(6) of the Regulations of the Commissioner of Education.

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.

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 their 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, defines the educational aspects of student's work experience, and outlines the school, student, and employer's responsibilities. This relationship would need to be part of a Registered GEWEP program that is overseen by an instructional staff member with the Coordinator of Work-Based Learning Programs extension. 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.

C8. Can experiences/hours that were completed prior to the start of grade 9 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 eighth and ninth grades only if they have completed the requirements for eighth grade by June and have 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 workforce 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
- 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 NYSED guidelines, under the supervision of the district, and documented in a student's transcript.

C12. Where can I find answers to other questions that I have about work-based learning?

The Office of Career and Technical Education has developed a Frequently Asked Questions page for work-based learning. Additional information may also be found in the work-based learning manual.

Students with Disabilities

C13. Are students with a disability required to have a job coach for work-based learning experiences?

Not necessarily. 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 Individualized Education Program (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

- 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 coach 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.

C14. 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 are 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. 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.

C15. 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 under Option 1, a student must be enrolled and successfully complete the equivalent of two units of study (or 216 hours)[3] of CTE course(s) and/or CTE programs of study taught by a teacher certified in a CTE content area. 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 development 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 is 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 certified teacher in a CTE content area as defined in section 100.1(l) of the Regulations of the Commissioner of Education 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:
    - 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

[3] 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.

CTE course offerings and programs of study approved at the local level or through the NYSED program approval process include the following content areas:

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

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

D3. Can a school district's general education courses that integrate CDOS learning standards (e.g., English language arts (ELA) where an activity is creating a resume) count toward 216 hours (2 units of study) in CTE coursework?

No. General education courses (e.g., ELA) do not count toward the 216 hours (2 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 through 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 them 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 instruction required at the middle level as part of the unit of study requirements for grades 7-8 pursuant to section 100.4(c) of the Regulations of the Commissioner of Education to meet the State intermediate learning standards does not count as CTE coursework to meet the requirement for the credential.

D6. Can coursework delivered through a distance learning network count as CTE coursework to meet CDOS Commencement Credential requirements?

For CTE coursework to count towards CDOS Commencement Credential requirements, it must be taught by a certified teacher of a CTE content area as defined in section 100.1(l) of the Regulations of the Commissioner of Education. With the exception of operationally approved programs in appearance enhancement, barbering, and the health sciences, the development of CTE curriculum is left to local control. Schools have the option to use distance learning so long as the instructor of record is a certified teacher of the applicable CTE content area who is employed by the school district or BOCES and not the vendor.

D7. Can online coursework provided through a third-party vendor be counted as CTE coursework to meet CDOS Commencement Credential Requirements?

For CTE coursework to count towards CDOS Commencement Credential requirements, it must be taught by a certified teacher of a CTE content area as defined in section 100.1(l) of the Regulations of the Commissioner of Education. With the exception of operationally approved programs in appearance enhancement, barbering, and the health sciences, the development of CTE curriculum is left to local control. Schools have the option to use the curriculum from a third party vendor so long as the instructor of record is a certified teacher of the applicable CTE content area who is employed by the school district or BOCES and not the vendor.

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. New York State provides model Career Plans beginning in kindergarten which districts may opt to use. Beginning in grade six, students may also create individual Career Plans with the "My Portfolio" tool found at the New York State Department of Labor's CareerZone.

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 their career plan. Additionally, a student's preferences and interests as identified in their 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 their IEP. While the career plan is a student-developed document, some students may require assistance in completing their career plan, and districts must provide appropriate assistance to students. How frequently a student works on their career plan will depend upon the individual student and their 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, exploration, and career development, their goals are expected to change over time based upon their experiences and what they have learned about specific careers. District personnel, parents, guardians, 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, 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 interests them, and learn about other career options.

Through the process of annually reviewing and revising the career plans, students 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. The NYSED Commencement Level Career Plan template may be used to document students' academic coursework, career exploration activities, and personal experiences. It provides a structured format for the student to reflect upon their skill development and post-secondary readiness throughout high school. The Commencement Level Career Plan template can be used to show evidence of the attainment of CDOS Learning Standard 3a.

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-based learning 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.

Commissioner's 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 as 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 1,2, and 3a; 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?

Yes, if the employability profile addresses all of the CDOS Learning Standards (1, 2, and 3a). Additional evidence may be used in conjunction with the employability profile as well.

F5. If a student earns 1s (unsatisfactory) and 2s (needs improvement) on the employability profile, will they 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 216 hours (2 units) 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 under 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 their post-secondary goals.

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 their 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 for CDOS Commencement Credential" for award of the NYS CDOS Commencement Credential that districts may opt 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 their 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?

Pursuant to section 100.6(b) of the Regulations of the Commissioner of Education, 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 must be maintained in the student's permanent file. 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. Additional information regarding student records retention can be found in the Records Retention and Disposition Schedule.

Consistent with the Records Retention and Disposition Schedule: 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

- 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

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 should not 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. 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's exit with a CDOS Commencement Credential, parents the student's parents must be given prior written notice indicating that the student continues to be eligible for FAPE until the end of the school year in which the student turns age 21 or until the receipt of a Regents or local diploma as outlined in Section 200.5(b)(5)(iii) of Commissioner's Regulations.

H. WORK READINESS CREDENTIALS

All Students

H1. Can a district offer coursework and training to prepare a student to take one of the nationally recognized work readiness assessments?

Yes. Districts can offer coursework and/or work-based learning experiences that will prepare a student for any of the Department-approved, nationally recognized work readiness assessments 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 Department-approved**,** nationally recognized work readiness assessments?

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

H3. Can parents pursue attainment of a CDOS Commencement Credential through Option 2 on their own with their child, outside of the school day?

To award the CDOS Commencement Credential through Option 2, the district must have documentation that the student passed a Department-approved, nationally recognized work readiness assessment. Public school districts must offer students the option to earn a CDOS Commencement Credential. As such, parents may opt 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
- An evaluation of the student's employability skills as documented in the employability profile of the student.