

ACT 158 FAQ

revised May 2023

FREQUENTLY ASKED QUESTIONS

While not a comprehensive source, this brief FAQ is designed to respond to overarching questions related to local preparation and logistical implementation.

GENERAL INFORMATION

MAY LOCAL GRADUATION REQUIREMENTS EXCEED OR LIMIT THE STATE'S REQUIREMENTS?

Minimally, statewide graduation requirements must be met; however, LEAs may establish additional local requirements as part of a Board-approved graduation policy. For example, an LEA may require:

- Options beyond those delineated in Section 121 of the Pennsylvania Public School Code.
- More rigorous options (such as Proficient or better on all three Keystone Exams).

AT WHAT GRADE LEVEL MAY A STUDENT BEGIN TO MEET STATEWIDE GRADUATION REQUIREMENTS?

The grade level at which a student begins to meet statewide graduation requirements is at the discretion of the LEA. Minimally, a student should be permitted to begin satisfying statewide requirements in the same grade level the student is permitted to begin satisfying LEA graduation requirements; however, a student might begin satisfying statewide requirements as early as the grade in which the first Keystone-associated course is offered.

ARE SCHOOLS REQUIRED TO OFFER ALL PATHWAY OPTIONS?

LEAs are not required to offer all the options under each pathway [e.g., not all schools offer an International Baccalaureate (IB) Diploma Programme]; however, when guiding a student to the pathway most feasible, LEAs should evaluate whether available opportunities are appropriate and if there are any barriers to student participation.

NOTE: With the passage of Act 55 of 2022, school districts, CTCs, charter schools, cyber charter schools, and regional charter schools are required to have at least one dual-credit agreement with an institution of higher education approved to operate in the commonwealth.

WILL THE CRITERIA EVER CHANGE (INCLUDING THE KEYSTONE COMPOSITE SCORE OR ALTERNATIVE ASSESSMENT CUT SCORES)?

The State Board of Education (SBE) must review the satisfactory Keystone composite score every five years and issue a report of its findings to the Senate and House Education Committees; unless the score is changed by an act of the General Assembly, the satisfactory Keystone composite score will remain in effect.

In [March 2020](#), the SBE approved:

- Satisfactory cut scores or minimum levels for the SAT, PSAT, SAT Subject Tests, ACT, ACT WorkKeys*, and the ASVAB**,
- Satisfactory cut scores and Keystone-equivalent exams for AP and IB Diploma Programs, and
- The list of additional evidence under the Evidence-Based Pathway.

Alteration of the above requires further approval by the State Board of Education; alteration of the pathways or pathway options as delineated in Section 121 of the School Code requires legislative action.

*The scores necessary to achieve Gold Level and Silver Level are determined, and may be changed, by ACT.

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**The minimum score on the AFQT to gain admittance to a branch of the armed services in the year the student graduates.

WHAT HAPPENS IF A CRITERION CHANGES AFTER A STUDENT COMPLETES THE REQUIREMENT BUT BEFORE THE STUDENT GRADUATES?

Once a criterion is met, the student does not need to meet the revised requirement in order to graduate except for the ASVAB cut score, which was approved by the State Board of Education as the minimum score to enter the military in the student's *year of graduation*.

MAY STUDENTS FULFILL GRADUATION REQUIREMENTS REMOTELY (E.G., ONLINE COURSEWORK OR INTERNSHIP)?

Yes. LEAs may work with outside agencies to offer students the flexibility to participate in a program or learning experience remotely, where appropriate.

WHAT FUNDING SOURCES ARE AVAILABLE TO ASSIST STUDENTS WITH ASSOCIATED COSTS?

Any funding source may be used if the expenditures qualify as allowable under the specific program, including Title I funds for those students receiving Title I services. If a Title I designation is schoolwide, all students qualify for funding.

College Board has a fee waiver program for both the [SAT and SAT subject tests](#), as well as the [PSAT/NMSQT](#). [ACT](#) also has a fee waiver program for eligible students, and [AP Exam](#) offers a fee reduction.

HOW DO WE WORK WITH STUDENTS WHO HAVE NOT MET THEIR ACADEMIC REQUIREMENTS BY THE GRADUATION CEREMONY?

If local policies allow, students may participate in graduation ceremonies and receive their diploma after all local and state high school graduation requirements have been met. Students have until September 30th of the following school year to meet graduation requirements and be included with the graduating class of the prior school year.

LEAs should encourage students to simultaneously pursue multiple pathways and/or types of evidence in order to avoid delays or uncertainties.

WHAT INFORMATION NEEDS TO BE INCLUDED ON STUDENT TRANSCRIPTS OR DIPLOMAS?

There is no requirement to include a student's performance levels on the Keystone Exams or to delineate the pathway by which a student graduated; however, an LEA may elect to include this information on the transcript or diploma.

NOTE: Per [Act 55 of 2022](#), the student transcript must list industry-recognized credentials attained by the student.

WHAT OPTIONS EXIST FOR STUDENTS WHO CANNOT MEET BOTH LOCAL AND STATEWIDE GRADUATION REQUIREMENTS?

Students with disabilities may graduate if they satisfactorily complete a special education program *that does not otherwise meet* graduation requirements, per [22 Pa. Code § 4.24\(d\)](#).

Students experiencing education instability (change in LEA enrollment due to homelessness, foster care, adjudication, or involvement with the juvenile justice system), who cannot meet local graduation requirements at either the current or prior LEA but who have met minimal statewide requirements may seek a Keystone Diploma option, per [24 P.S. § 13-1331.1](#).

Students who do not fall into one of the above categories and cannot meet local and minimal statewide graduation requirements are not eligible to graduate. Students who meet local graduation requirements but who are unable

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to meet a pathway to graduation may have the pathway-specific requirements waived and be granted a diploma by the chief school administrator, *provided* the student meets locally established, grade-based requirements for each Keystone content area in which they do not have a Keystone Exam score \geq 1500 or a Non-Numeric Proficient.

KEYSTONE EXAMS & KEYSTONE SCORES (NUMERIC, NON-NUMERIC)

MUST A STUDENT PARTICIPATE IN ALL THREE KEYSTONE EXAMS IN ORDER TO MEET STATEWIDE HIGH SCHOOL GRADUATION REQUIREMENTS?

No. A student meets the Keystone Proficiency Pathway if the student qualifies for a non-numeric score of Proficient or better for each Keystone Exam in which the student does not have a numeric score.

A student who opts out of or otherwise does not participate in one or more Keystone Exams may also meet the statewide graduation requirements under Section 121 of the Pennsylvania Public School Code via the CTE Concentrator, Alternative Assessment, or Evidence-Based Pathway or via a waiver or IEP.

A student who graduates via the CTE Concentrator, Alternative Assessment, or Evidence-Based Pathway or a waiver must meet locally established grade-based requirements for each Keystone content area in which the student did not attain a numeric score of Proficient/Advanced on the related Keystone Exam *or* qualify for a non-numeric score of Proficient.

NOTE: Student non-participation in statewide assessments affects the LEA's participation rate and may affect the LEA's federal accountability designation.

WHAT IS THE DIFFERENCE BETWEEN A "NUMERIC" AND A "NON-NUMERIC" SCORE?

A student who participates in a Keystone Exam receives both a numeric score (e.g., 1500) and a corresponding performance level, the non-numeric score (e.g., Proficient).

Where a student performance level on Keystone academic content is determined without the associated Keystone Exam result (see [How May a Student Qualify for a Non-Numeric Score of Proficient without Participation in a Keystone Exam?](#)), *only a non-numeric score* may be assigned as the determination is without a standardized measure and at the LEA's discretion.

NOTE: A student demonstrating proficiency in Keystone academic content for the purposes of meeting [locally established, grade-based requirements](#) is *not* considered to have a non-numeric Proficient score in that Keystone academic content area.

HOW MAY A STUDENT QUALIFY FOR A NON-NUMERIC SCORE OF PROFICIENT WITHOUT PARTICIPATION IN A KEYSTONE EXAM?

There are two circumstances under which a student may qualify for a non-numeric score of Proficient *without* participation in a Keystone Exam:

- The student has demonstrated proficiency through comparable coursework and an equivalent assessment in a prior educational setting, or
- During the 2019-20 school year *only*, the student successfully completed a course* that was 1) in an academic content area associated with the Keystone Exam and 2) locally-established as a grade-based requirement for demonstrating mastery of the Keystone content per Act 136 of 2020.

*Including a student who may have been unsuccessful in demonstrating Proficiency in the associated Keystone Exam prior to the 2019-20 school year. By way of example, a student who attained a numeric score of 1460 (Basic) in the Biology Keystone Exam during the 2018-19 school year was eligible to receive a non-numeric Proficient for

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successfully completing a course associated with the Keystone content during the 2019-20 school year (e.g., repeat the trigger course, participate in an eligible credit-recovery course). That student may utilize either the numeric score of 1460 *or* the non-numeric Proficient in order to satisfy statewide graduation requirements.

NOTE: For the purposes of *federal accountability*, only a “first-time test-taker” who successfully completed a Keystone content-associated course during the 2019-20 school year is included in required reporting to the United States Department of Education.

HOW DOES AN LEA DETERMINE A STUDENT HAS DEMONSTRATED KEYSTONE PROFICIENCY IN A PRIOR EDUCATIONAL SETTING FOR THE PURPOSE OF AWARDING A NON-NUMERIC PROFICIENT?

Students transferring into a Pennsylvania high school from out-of-state, a private school, a home school environment, or from out-of-country may qualify for a non-numeric Keystone Exam score of Proficient if the LEA:

- Determines that the standardized assessment the student has completed aligns with the state academic standards assessed by the Keystone Exam, *and*
- Evaluates the student’s performance to be commensurate with a Keystone Exam score of Proficient or better, *and*
- Verifies the transcript shows credit earned in Algebra 1, or an equivalent course; Literature, or an equivalent course; or Biology 1, or an equivalent course.

If one or more of the above are not met (e.g., the student did not participate in a standardized assessment), the LEA may not award a non-numeric proficient score but may consider the student as having meet locally established, grade-based requirements for the Keystone content.

MAY A TRANSFER STUDENT BE AWARDED A NON-NUMERIC PROFICIENT SCORE PER ACT 136 OF 2020?

Yes. The LEA may award the student a non-numeric proficient score provided the transfer student successfully completed a Keystone related course in the prior educational setting during the 2019-20 school year (the only year in which statewide assessments were not required to be administered for federal accountability purposes) regardless of whether they participated in an associated standardized assessment.

Other educational settings impacted by the federal accountability waiver include home education and private schools as well as out-of-state schools.

MAY A NON-NUMERIC SCORE BE USED TO SATISFY STATEWIDE HIGH SCHOOL GRADUATION REQUIREMENTS?

Yes. Non-numeric scores may be used to satisfy the Keystone Proficiency Pathway requirements or to fulfill criteria under Section Two of the Evidence-Based Pathway; however, non-numeric scores may *not* be used to satisfy the Keystone 3-score Composite Pathway as three numerical values are required to calculate the composite score. In order to qualify for the Keystone 2-score Composite Pathway, a student must have earned one non-numeric proficiency under Act 136; however, the numeric scores in the other two Keystone content areas must be used to satisfy pathway requirements.

Also, a student pursuing the CTE, Alternative Assessment, or Evidence-Based Pathway is not required to meet locally established grade-based requirements for Keystone academic content in which the student has a numeric or non-numeric score of Proficient/Advanced.

NOTE: A student meeting locally established, grade-based requirements for Keystone academic content is not considered to have attained a “non-numeric Proficient” Keystone Exam score in that Keystone academic content area.

IS A STUDENT REQUIRED TO RETAKE A KEYSTONE EXAM AFTER AN UNSUCCESSFUL ATTEMPT?

There is no state requirement for a student to retake any Keystone Exam. However, locally established policies may require a student to retake a Keystone Exam for purposes of meeting the LEA’s graduation requirements.

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NOTE: A student who scores Basic or Below Basic may request to retake the assessment; a student who achieves a score of Proficient or Advanced on a Keystone Exam may retake the exam if the student or parent/guardian submits a request in writing to the LEA.

MAY A STUDENT WITH A NON-NUMERIC SCORE OF PROFICIENT TAKE THE ASSOCIATED KEYSTONE EXAM?

Yes. A student who was awarded a non-numeric score of Proficient may elect to take the associated Keystone Exam and may utilize whichever score (numeric or non-numeric) is more advantageous in meeting pathway requirements.

NOTE: If a student earned a non-numeric proficient in a Keystone Exam and subsequently elected to take the Keystone Exam in that content area, the student remains eligible for the 2-score composite pathway but cannot use that numeric score to calculate the 2-score composite.

KEYSTONE PROFICIENCY & KEYSTONE COMPOSITE PATHWAYS

TO GRADUATE ON THE KEYSTONE PROFICIENCY OR THE KEYSTONE COMPOSITE PATHWAY, MUST A STUDENT PASS THE KEYSTONE EXAM 'TRIGGER' COURSES?

No. By way of example, an advanced student might earn a score ≥ 1500 on a Keystone Exam without having taken the associated "trigger" course.

NOTE: The Keystone Proficiency Pathway requirements may be met using one or more *non-numeric* scores of Proficient - eligibility for which requires the student to have passed the associated course (see [What is the Difference between a "Numeric" and a "Non-Numeric" Score](#)).

HOW WERE THE KEYSTONE COMPOSITE PATHWAY CRITERIA DETERMINED?

The Keystone 3-score Composite Pathway criteria were informed by a report to the legislature, titled [Findings and Recommendations Pursuant to Act 1 of 2016](#), and approved by the State Board of Education. Per Act 55 of 2022, a subsequent 2-score criterion was established in collaboration with PDE's Technical Advisory Committee

MAY SCORES FROM STANDARDIZED ASSESSMENTS OTHER THAN KEYSTONE EXAMS BE CALCULATED AS PART OF A KEYSTONE COMPOSITE SCORE?

No. Other standardized assessment scores may not be used to calculate the Keystone composite score; however, they may be used to satisfy requirements to meet pathways *other* than Keystone Composite (including Keystone Proficiency).

LOCALLY ESTABLISHED GRADE-BASED REQUIREMENTS

MUST A STUDENT PASS THE KEYSTONE TRIGGER COURSE IN ORDER TO DEMONSTRATE PROFICIENCY WHEN MEETING LOCALLY ESTABLISHED, GRADE-BASED REQUIREMENTS?

Not necessarily. Minimally, performance criteria reflected in the local graduation policy as consistent with proficiency in Keystone academic content should include the successful completion of an associated trigger course*. However, where a student is unable to successfully complete a trigger course, an LEA might consider permitting the student to demonstrate proficiency through the successful completion of either a:

- Project-Based Assessment (PBA), or

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- Credit recovery course *provided* the coursework covers the same breadth and depth of Keystone eligible content as the original trigger course (as determined by the LEA) and a passing grade/credit is reflected on the student transcript.

*A trigger course aligns to Keystone-associated academic standards and results in a Keystone Exam. Where the standards are addressed over a series of courses (e.g., Algebra 1A and Algebra 1B), the last in the series is usually designated as the trigger course because the eligible content should be covered completely prior to ‘triggering’ an end-of-course exam; however, LEAs may consider student performance *across* the course series (both Algebra 1A and Algebra 1B) when determining proficiency in the Keystone academic content for the purposes of meeting locally established, grade-based requirements.

NOTE: Where a student may have been placed in an advanced course rather than the trigger course, they may be deemed as having met locally established, grade-based requirements if the course covers the breadth and depth of the eligible content.

MAY A PROJECT BASED ASSESSMENT BE USED IN LIEU OF A KEYSTONE EXAM?

No. However, Project Based Assessments (PBA) may provide another option for a student to meet locally established grade-based requirements for Keystone academic content where a student has not demonstrated proficiency (i.e., does not have a numeric or non-numeric score of Proficient/Advanced). NOTE: An LEA may not require a student to complete a PBA.

LEAs may utilize the Department-provided PBAs or design their own. The PBAs on the SAS website, accessible to LEA Assessment Coordinators*, offer two modules per Keystone Exam – Module 1 and Module 2. For example, in the Algebra I modules, Module 1 addresses Operations and Linear Equations and Inequalities while Module 2 addresses Linear Functions and Data Organization.

The PBAs on the SAS website may serve as models; however, LEAs should determine the circumstances around PBA administration: method of delivery, teacher oversight, length of time to complete the work, scoring protocols, etc.

* LEA Assessment Coordinators requiring access should contact the SAS Help Desk at 877.973.3727.

MAY A STUDENT SATISFY LOCALLY ESTABLISHED GRADE-BASED REQUIREMENTS THROUGH AN ADVANCED PLACEMENT OR CONCURRENT ENROLLMENT COURSE?

Yes, if the LEA has adopted a local graduation policy to that effect. The LEA is not required to identify the AP or concurrent enrollment course as a Keystone Exam ‘trigger course’; however, the LEA must determine that the course covers the same breadth and depth of the Keystone eligible content.

NOTE: Where a passing grade in a concurrent enrollment course is used to satisfy locally established grade-based requirements for a student, the same course grade may not be used to also satisfy a pathway criterion for the same student.

CAREER & TECHNICAL EDUCATION (CTE) CONCENTRATOR PATHWAY

WHO IS A CTE CONCENTRATOR?

Section 121 of the Pennsylvania Public School Code defines a [CTE Concentrator](#) as a student who:

- is enrolled in a PDE-approved CTE Program, and
- has successfully completed at least 50% of the minimum technical instructional hours required under 22 Pa. Code Ch. 339.

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MAY ANY SCIENCE COURSE BE USED IN LIEU OF BIOLOGY WHEN ESTABLISHING LOCAL GRADE-BASED REQUIREMENTS FOR CTC STUDENTS?

Any science, technology, or environment and ecology course may satisfy the requirements for the academic content area associated with the Keystone Exam in Biology for CTE concentrators.

The LEA may identify either the course that culminates in the Keystone Biology Exam or, where the standards are addressed over a series of courses, the LEA may consider student performance *across* the course series when determining proficiency in the Keystone academic content for the purposes of meeting locally established, grade-based requirements.

ALTERNATIVE ASSESSMENT & EVIDENCE-BASED PATHWAYS

MUST A STUDENT MEET PATHWAY-SPECIFIC CRITERIA FOR EACH KEYSTONE CONTENT AREA IN WHICH THE STUDENT DID NOT DEMONSTRATE PROFICIENCY?

The only pathway-specific criteria based upon Keystone academic content are the the AP Exam, IB Exam, and concurrent enrollment course criteria under the *Alternative Assessment Pathway*, which require an associated exam or course for each Keystone content area in which the student has not demonstrated proficiency (i.e., has a numeric or non-numeric Proficient/Advanced).

By way of example, a student who has a non-numeric score of Proficient for only Keystone Literature would satisfy the following under the AP Exam criterion for the Alternative Assessment Pathway:

Locally Established, Grade-Based Requirement (LEGBR)	Alternative Assessment Pathway: AP Exam Criterion
Meet LEGBR for Algebra I	Must score 3 or higher on AP Exam aligned to Algebra content
Meet LEGBR for Biology	Must score 3 or higher on AP Exam aligned to Biology content

Alternatively, that same student might choose to successfully complete only *one* approved pre-apprenticeship program in *any* discipline in order to satisfy the Alternative Assessment Pathway.

Locally Established, Grade-Based Requirement (LEGBR)	Alternative Assessment Pathway
Meet LEGBR for Algebra I	Must successfully complete one approved pre-apprenticeship
Meet LEGBR for Biology	

NOTE: Under the Evidence-Based Pathway, the AP Exam, IB Exam, and concurrent enrollment or postsecondary course criteria may be in *any* content area consistent with the student's goals and career plan.

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MAY A PSAT 10 SCORE SATISFY THE CRITERION UNDER THE ALTERNATIVE ASSESSMENT PATHWAY?

Yes. For the purposes of meeting this criterion under the Alternative Assessment Pathway, a score of 970 or better on the PSAT 10 is the same as achieving a score of 970 or better on the PSAT/NMSQT.

NOTE: A score in the PSAT 8/9 may not be utilized to satisfy this pathway as it has a different scoring scale.

MAY A STUDENT WHO PARTICIPATES IN THE ASVAB WITH ACCOMMODATIONS BE CONSIDERED AS HAVING MET REQUIREMENTS FOR ADMITTANCE INTO THE ARMED SERVICES?

No. Only Armed Forces Qualifying Test (AFQT) scores obtained from an ASVAB exam session given under identical (i.e., [standardized](#)) conditions may be considered as having met the minimum score to gain admittance to a branch of the armed services, thereby satisfying the criterion under the Alternative Assessment Pathway.

NOTE: Accommodations are available for the ASVAB Career Exploration Program (CEP) which, if appropriate for the student, may be incorporated into an IEP for the purpose of meeting Pennsylvania's Career Education and Work (CEW) standards.

MUST CONCURRENT ENROLLMENT COURSE CREDIT EARNED APPEAR ON BOTH THE HIGH SCHOOL TRANSCRIPT AND A POSTSECONDARY TRANSCRIPT?

A concurrent enrollment course is one in which *both* high school and postsecondary credit are earned upon successful completion; therefore, the student must successfully complete a course that offers both high school and college credit (e.g., dual credit, college in the high school).

However, where an additional fee may be required for the credit to appear on a postsecondary transcript, the LEA/student does not need to assume the cost in order to meet statewide high school graduation requirements.

MAY A STUDENT SATISFY A CRITERION IN A LANGUAGE OTHER THAN ENGLISH OR BY USING EVIDENCE FROM OUTSIDE THE US?

Provided it meets both the definition and parameters of the criterion, evidence attained in a foreign language or from outside the United States may be accepted.

By way of example:

- work-based or service-learning experiences occurring in a foreign language setting
- concurrent enrollment or postsecondary courses conducted in a foreign language
- exams (such as for an industry-recognized credential) conducted in a foreign language
- postsecondary acceptance into an accredited nonprofit institution of higher education situated in an independent territory or foreign country
- offer of employment or enlistment with an entity situated in an independent territory or foreign country

SPECIAL STUDENT POPULATIONS AND CIRCUMSTANCES

MAY A CHIEF SCHOOL ADMINISTRATOR WAIVE GRADUATION REQUIREMENTS?

Yes, to an extent. For a student either in grade 12 or experiencing extenuating circumstances who does not meet the Keystone Proficiency or Keystone Composite Pathway requirements, the chief school administrator may waive the student's obligation to satisfy criteria under other pathways *provided* the student successfully completes locally established, grade-based requirements for academic content associated with each Keystone Exam for which the student was not deemed Proficient via a numeric or non-numeric score.

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Extenuating circumstances include serious illness, death in the student's immediate family, family emergency, frequent school transfers, and transfer from out-of-state in grade 12. Per State Board of Education resolutions, the pandemic also may be considered an extenuating circumstance for which a waiver may be granted to students in the *graduating classes of 2023, 2024, and 2025*.

If the waivers granted by a chief school administrator exceed more than five percent of students in a graduating class, PDE will conduct a review of the waivers granted by the LEA. The LEA will be required to submit an improvement plan to PDE and will be subject to an audit conducted by PDE *unless* PDE determines that the five percent threshold was exceeded because waivers were granted to students who experienced extenuating circumstances.

HOW CAN AN LEA ASSIST ENGLISH LEARNERS IN MEETING GRADUATION REQUIREMENTS?

In addition to accommodations to the Algebra and Biology Keystone Exams, the following may prove beneficial when working with ELs:

- Both the SAT and ACT offer testing supports for English Learners.
- Concurrent enrollment or post-secondary courses (i.e., college-level, dual credit courses) may be available online in the student's native language.
- A pre-apprenticeship or other work-based experience in which the predominant language spoken is not English may be an option.
- Service learning projects may be developed where language is not a barrier.
- A guarantee of full-time employment/military enlistment outside of the US may be accepted as evidence.
- Industry-Recognized Credentials may be earned in the student's native language. ([SkillUp PA](#), a free online platform, offers preparatory courses for credentialization translated into various languages)
- Acceptance into an accredited non-profit IHE outside of the US may be acceptable.

WHAT GRADUATION OPTIONS EXIST FOR STUDENTS EXPERIENCING EDUCATION INSTABILITY?

Where a student is identified, per Act 1 of 2022 (Act 1), as experiencing education instability and is not eligible to graduate on time, LEAs should evaluate prior coursework and/or determine mastery of course content in order to award partial or full credit toward meeting local graduation requirements. If the student is still unable to meet local graduation requirements, the LEA should collaborate with the chief school administrator of the prior school to determine whether the student meets the local graduation requirements of the prior entity.

If the student is unable to meet local graduation requirements at either their current or prior school entities, the LEA may request a PDE-issued Keystone diploma; however, a student granted a Keystone Diploma will be considered a non-graduate at the local level – reducing the LEA's Grad Rate in the FRPA Index.

NOTE: A student requesting a Keystone Diploma *minimally* must meet Locally Established, Grade-Based Requirements for each Keystone content area in which the student does not have a numeric or non-numeric Proficient or Advanced.

WHAT GRADUATION OPTIONS EXIST FOR A STUDENT WITH DISABILITIES?

Most students with IEPs will graduate via one of the five pathways; however a student with a disability who satisfactorily completes a special education program developed by an individualized education program team under the Individuals with Disabilities Education Act and 22 Pa. Code Ch. 14 (relating to special education services and programs) that *does not otherwise meet* statewide graduation requirements is to be issued a regular high school diploma by the student's LEA. A student who graduates in this manner is not considered as having graduated via a Graduation Pathway under Section 121 of the Pennsylvania Public School Code, nor is the student included in the waiver count.

NOTE: All students, including students with disabilities, are required to participate in the Keystone Exams for the purposes of federal accountability - *unless* the student participates in the Grade 11 [PASA](#).

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ARE THERE LIMITATIONS WHEN GRADUATING STUDENTS VIA IEP GOALS?

No. The number or percentage of students within a graduating class issued diplomas for the satisfactory completion of a special education program is not limited, and students do not have to qualify for the PASA in order to graduate in this manner.

MUST AN ADULT STUDENT OR A STUDENT WHO IS RE-ENGAGED IN A DIPLOMA PROGRAM MEET STATEWIDE GRADUATION REQUIREMENTS?

Students who are legally entitled to attend school in the commonwealth (e.g., those students who are 21 years of age or younger or have turned 21 during the school term) and who are re-engaged in the academic program as delineated in Chapter 4 are subject to statewide high school graduation requirements, including students with a GED who are working toward a diploma or students beyond the age of 21 in an extended school program per a hearing officer decision or court order.

Participants in preparation programs for a Commonwealth Secondary School Diploma or High School Equivalency (via a GED, HiSET, or 30 college credit option) are not expressly subject to statewide graduation requirements, nor are adults who do not meet the above conditions but are engaged in an LEA-offered program resulting in the local issuance of a high school diploma.

NOTE: If students continue in their special education program beyond Grade 12, they may participate in the graduation ceremony with their 12th grade peers and receive a certificate.

MUST A STUDENT PLACED IN AN ALTERNATE EDUCATIONAL SETTING MEET STATEWIDE GRADUATION REQUIREMENTS?

If a student is enrolled at a school entity as defined in Section 121 of the Pennsylvania Public School Code, the student must meet the statewide graduation requirements. Specifically, a school entity is defined as a school district, intermediate unit, area vocational-technical school, charter school, cyber charter school, regional charter school, or multiple charter school organization. Entities not included in the definition are not subject to Section 121, but may be subject to other mandates regarding responsibilities to a home/host district for student academic progress and achievement of graduation requirements; see Department guidance delineated in the [Basic Education Circulars \(BECs\)](#) for more information.

Students participating in a home education program are not subject to [§121](#); however, other [Home Education Programs](#) remain in place.

TRACKING AND REPORTING

HOW CAN SCHOOLS TRACK STUDENT PATHWAYS?

Schools may elect to use the PDE-provided tracking tool available through [MyPDESuite](#). This optional tool will:

- Assist in determining pathway options for students by identifying those students not meeting Keystone Exam or Keystone Composite score requirements, and
- Allow the LEA/school to enter and track each student's progress toward viable graduation pathways.

Although the tracking tool will permit the batch upload of data, it is not an online repository for individual student artifacts; therefore, schools should establish procedures for the local management and retention of pathway evidence.

WHAT MUST LEAS REPORT TO THE DEPARTMENT?

No later than December 1, 2023, and each December 1 thereafter, each LEA must submit via the Future Ready

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Comprehensive Planning Portal (FRCPP) the following:

- Total number of students enrolled in twelfth grade and number graduated within the prior school year
- Number of students within the class graduating by pathway and, for the Alternative and Evidence-Based Pathways, delineated by the option(s) utilized
- Number of students within the graduation class granted a waiver
- Number of students within the class graduating by IEP goals

NOTE: PDE will publish LEA-reported data on an annual basis via the Future Ready PA Index. Although student-level information will not be reported or submitted to the state, LEAs should maintain documentation of student evidence at the local level though not necessarily the evidence itself. By way of example, documentation should indicate the Evidence-Based Pathway and the three criteria met - but might not include the actual employment letter.