

Understanding the use of Emergency Graduation Credit Waivers in the Road Map Project region



June 2022

In response to the emergency stay home orders issued at the outset of the pandemic in 2020, the Washington State Board of Education established the [Graduation Requirements Emergency Waiver](#) (GREW) program which allowed authorized school districts to waive selected graduation requirements for students most impacted by the pandemic — in addition to the graduation pathway requirements that went into effect during the 2020 academic year. Through this program, districts in the Road Map Project region (Road Map region) began issuing emergency waivers to students to facilitate their timely graduation amidst a very challenging and tumultuous year. Two years in, the practice continues, and Community Center for Education Results (the backbone organization for the Road Map Project) sought to understand exactly how the waivers are being issued, who is using them, and what the longer-term consequences might be for students who plan to attend college.

This brief shares our learnings from a series of discussions with representatives from the SBE, school districts, reengagement providers, and a program serving youth in foster care in the Road Map region, in combination with coursetaking data¹ among students who attended 12th grade in Road Map Project schools during the 2020-21 academic year. While these discussions covered all types of emergency graduation requirement waivers, the data related portions of this brief only address course credits waived through GREW — and do not include graduation pathway waivers or any other type of graduation requirements that could be waived through the program. We plan to engage in deeper analysis with updated data as it becomes available, and have discussions with students, families, and practitioners across the high school and postsecondary continuum to inform this issue and center those who have the most direct experience with the waivers.

Note: At the time of preparing this analysis, our researchers were limited to using only high level racial/ethnic categories. These categories often minimize and erase the dramatically different realities that students experience across ethnicities within these broad race groupings. We intend to further disaggregate these racial/ethnic groups in future analyses.

¹ The research presented here uses confidential data from the Education Research and Data Center (ERDC) located within the Washington Office of Financial Management (OFM). ERDC's data system is a statewide longitudinal data system that includes de-identified data about people's preschool, educational, and workforce experiences. The views expressed here are those of the authors and do not necessarily represent those of OFM or other data contributors. Any errors are attributable to the authors.

This analysis includes academic data from ERDC for all 12th graders who attended high school in the seven Road Map Project districts during the 2020-21 academic year. For this analysis, we used a letter grade of "V" for any course to estimate the use of Graduation Requirements Emergency Waivers (GREW) and include waived courses but not waived pathways or other types of graduation requirements. Students' enrollment in their schools (and the region) was calculated by where they were enrolled at the end of the year. Additionally, results are based on the data available through the CEDARs dataset for Road Map Project schools and may not include updates made to district data after the 2020-2021 CEDARS submission cut-off — as a result, numbers may vary from each district's internal numbers. To protect student privacy, results representing fewer than 10 students (in the denominator) have been suppressed.

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How waivers were put in place and who received them



The GREW program was developed with best intentions to help students graduate on time. They were meant to be issued statewide on an individual basis to students who experienced significant disruption to their studies due to COVID-19, and to students who were unable to meet the graduation requirements through other means.

Process

After conversations with districts and reengagement programs, we learned that the process for initiating waivers was generally started by counselors or teachers who reached out to select students deemed candidates for the waiver (for example, a student experiencing homelessness or a student wanting to move straight into a job after graduating from high school). While the level of communication with students and families seems to vary, counselors or teachers have discussions with students and make sure the schools have done all they can to support students in completing graduation requirements before proposing the course waiver as a final option.

A few representatives we spoke with said they try to meet with students and their families to discuss the implications of the waiver prior to seeking approval for a waiver. In some districts, once the process begins, the waiver is submitted to the principal and then to the central office for approval. In other districts, like Renton, all waivers are signed by a parent but do not always go through the principal. The central office tries to ensure the district did everything to support students to achieve course completion success prior to proposing the waiver option. The office also tries to get context for the decisions made and to understand each student's situation, although the person approving final sign-off may likely not be privy to a student's personal information.

We heard that directives from system-level entities like OSPI, school districts and the state board left room for disparate interpretation, which created confusion among teachers, counselors, and administrators. Reengagement programs (high school and GED programs that serve young people who have disengaged from traditional high school) were a level removed from the school system and experienced frustration around procedures, while ultimately needing to be accountable to school districts.

Who received emergency graduation credit waivers?

Many district representatives acknowledged that emergency graduation requirement waivers were more frequently granted to students of color, which was confirmed in our data. They shared that the waivers were granted in response to wanting to alleviate some of the burdens of COVID-19 — which disproportionately affected students of color. They asserted that supports were needed across the education continuum to ensure that students who received waivers didn't end up being penalized.

In our analysis we looked at the use of credit waivers across several different groups, and chose to focus on race/ethnicity, housing status, and emergent multilingual status. We also conducted an analysis on students with disabilities and students enrolled in special education programs and found that the use of credit waivers within these groups was only about 2 percent higher than students not enrolled in these programs. We did not have access to the data related to students in foster care, but from our discussion with foster care and reengagement programs, we heard that the option to use waivers was critical for many of these students. The number of highly mobile students in our data was too small to include in the analysis. Finally, due to limitations on the ability to use Free and Reduced Priced Lunch status across all districts, we were unable to include a consistent comparison of waiver use across these groups for the region.

The following graphs look at the frequency and types of credit waivers given across race/ethnicity and other groups. The goal is to see which students are most affected by the intended and unintended outcomes of the program, so that future supports can be administered equitably. **Figure 1a** shows 12th graders in the Road Map region during the 2020-21 academic year who received emergency credit waivers by race. **Figure 1b** shows students' use of credit waivers during the same year by race and gender. Here we see males across all races except Pacific Islanders received more waivers than females. (*Note: the non-binary gender represented groups fewer than 10 when disaggregated by race so these results were suppressed to protect student privacy*).

Figure 1a. Road Map Project 12th graders who received Graduation Emergency Waivers (GREW) during the 2020-21 academic year

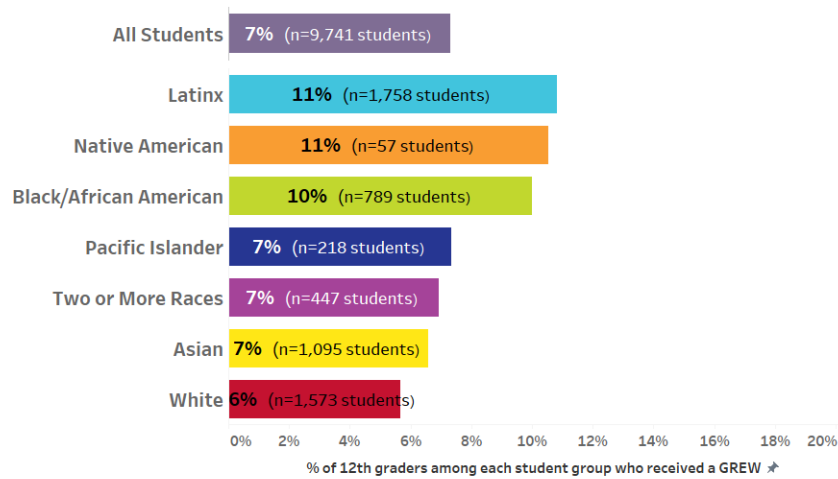
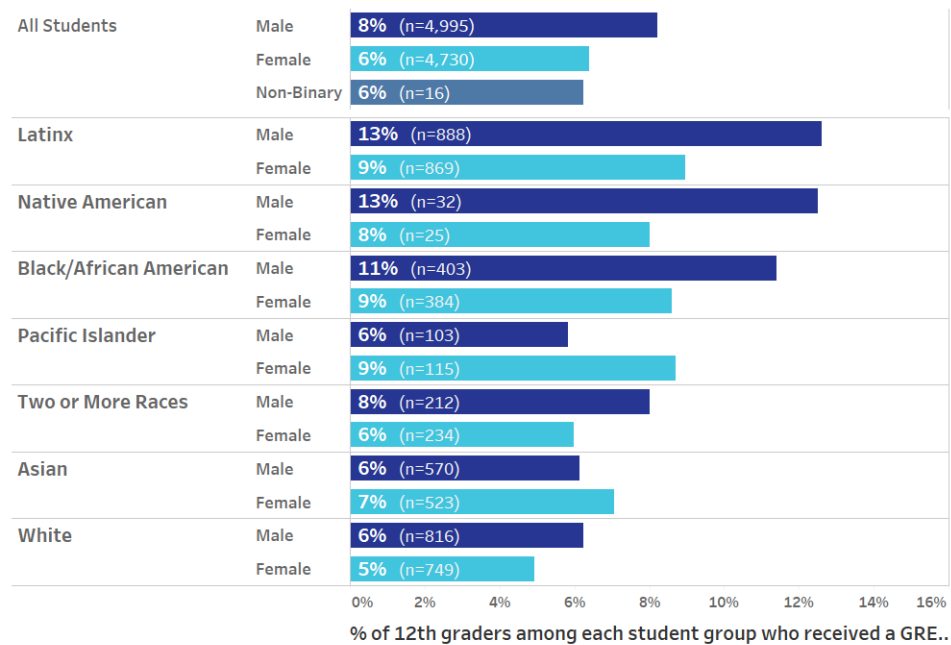


Figure 1b. Waivers granted to Road Map Project 12th graders across race/ethnicities and gender during the 2020-21 academic year

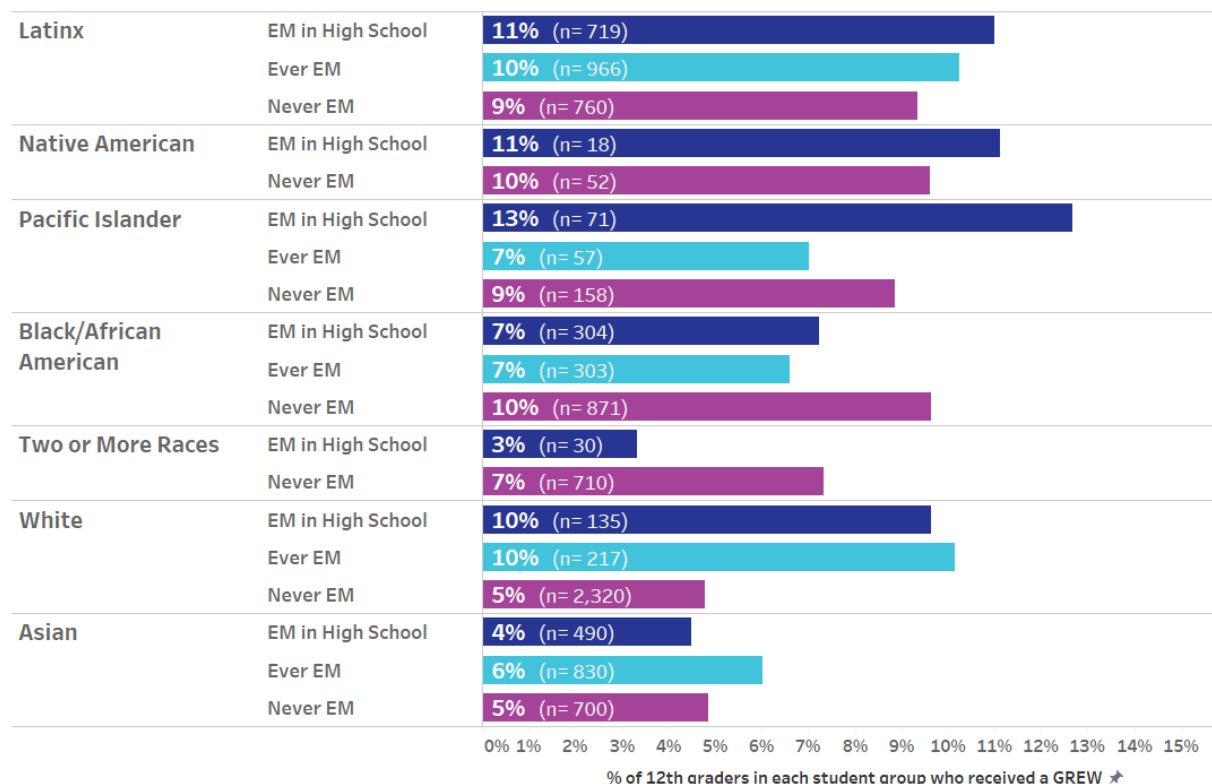


Notes for Figures 1a and 1b:

"n" represents the number of students in the underlying student population enrolled in 12th grade within the region. See Footnote 1 for information about data source and analysis methods.

In our discussions with school representatives, there was speculation that Emergent Multilingual students were receiving more credit waivers. However, **Figure 2** shows that, in general, this wasn't the case across all groups. Black students who were never Emergent Multilingual received more waivers than Black Emergent Multilingual students. Only among white students did the Emergent Multilingual group receive substantially more waivers than students who were never Emergent Multilinguals.

Figure 2. Emergent Multilinguals appeared to receive a relatively similar proportion of waivers when viewed with the intersection of race/ethnicity (2020-21 academic year)



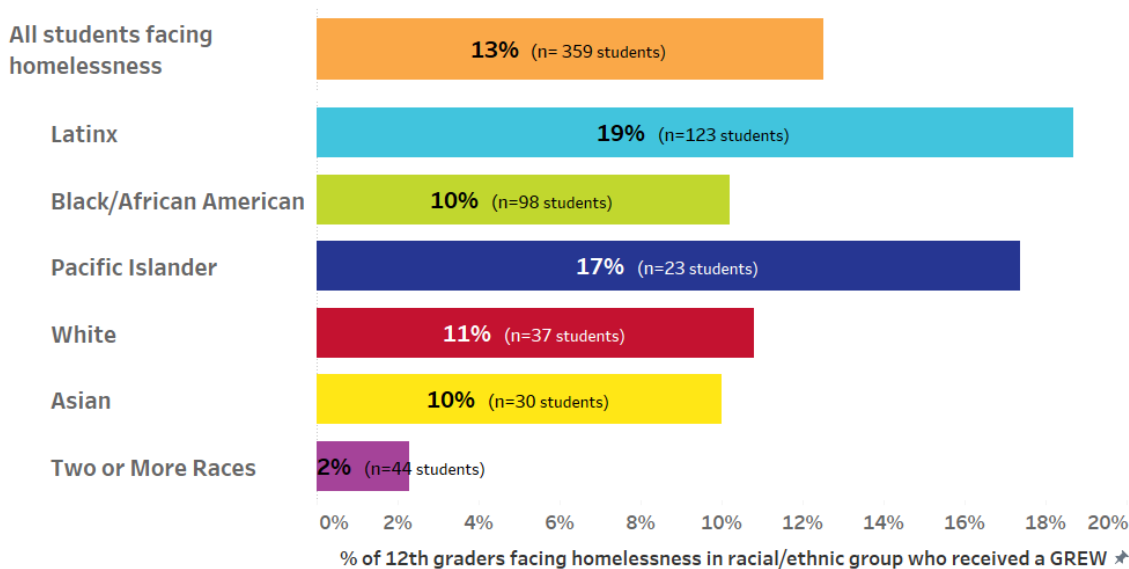
Notes:

"n" represents the number of students in the underlying student population enrolled in 12th grade within the region. See Footnote 1 for information about data source and analysis methods.

As we know, the emergency waivers were intended to support those most impacted by the pandemic, and these waivers do appear to have been extended in this way. One example is waiver use among students facing homelessness — 13 percent received waivers, compared to the 7 percent rate of students overall (Figure 3). Use of waivers was particularly high for Latinx students facing homelessness — when we further disaggregated by gender, we found that 23 percent of Latinx males facing homelessness received waivers.

Figure 3 shows the proportion of each group (by race) who received credit waivers but is ordered by the number of students who received the waivers to highlight the actual impact on each group.

Figure 3. Emergency waivers granted to Road Map Project 12th graders who faced homelessness during the 2020-21 academic year



Notes:

Definition of students facing homelessness is based on the presence of a McKinney-Vento flag on the student record. "n" represents the number of students in the underlying student population who were enrolled in 12th grade within the region and experienced homelessness during the academic year. See Footnote 1 for information about data source and analysis methods.

Good Faith Efforts

To authorize the use of a waiver, districts had to demonstrate a **“good faith” effort** to help students meet the graduation requirements through every other appropriate option prior to granting a waiver.

The State Board of Education (SBE) offered the following definition:

“Good faith effort” means the district considered and implemented options to support individual students in meeting credit and pathway requirements. This could include awarding credit based on mastery-based learning; expanded or extended learning opportunities; dual credit; Career and Technical Education (CTE) course equivalencies; and students’ awareness of and ability to access available assessments used for graduation pathway options. [Waiver Quick Info](#)

As noted by the SBE and each of the districts and programs we spoke with, this definition is subjective and leads to variation in interpretation and implementation. While there was a requirement for districts to track the good faith efforts, there was no reasonable way to require standardized tracking and reporting of the use of different good faith efforts. As a result, we were unable to quantify which efforts were implemented (though this may be possible with deeper district-specific research) — our understanding of how each district deemed good faith efforts were met is anecdotal and self-reported.

Staff at various school districts in our region and in reengagement programs told us that recommending waivers was a necessity in certain cases to engage and support students through their last months of high school. In most cases, the intent was to only waive non-core-credit courses. While lessons are being learned about how to proceed, staff are working to be more intentional about the process.

Some districts closely followed the state guidelines, and a few programs and districts took extra steps when implementing waivers. For example, reengagement programs like Career Link looked at students' desired pathways and the impact waivers would have on their intended career path before waiving any credit. They mostly waived graduation pathway requirements and electives but did not waive college-eligible classes students would need to pay for later. Extra efforts were made to help students understand the implications of waiving a course if college was part of their intended path.

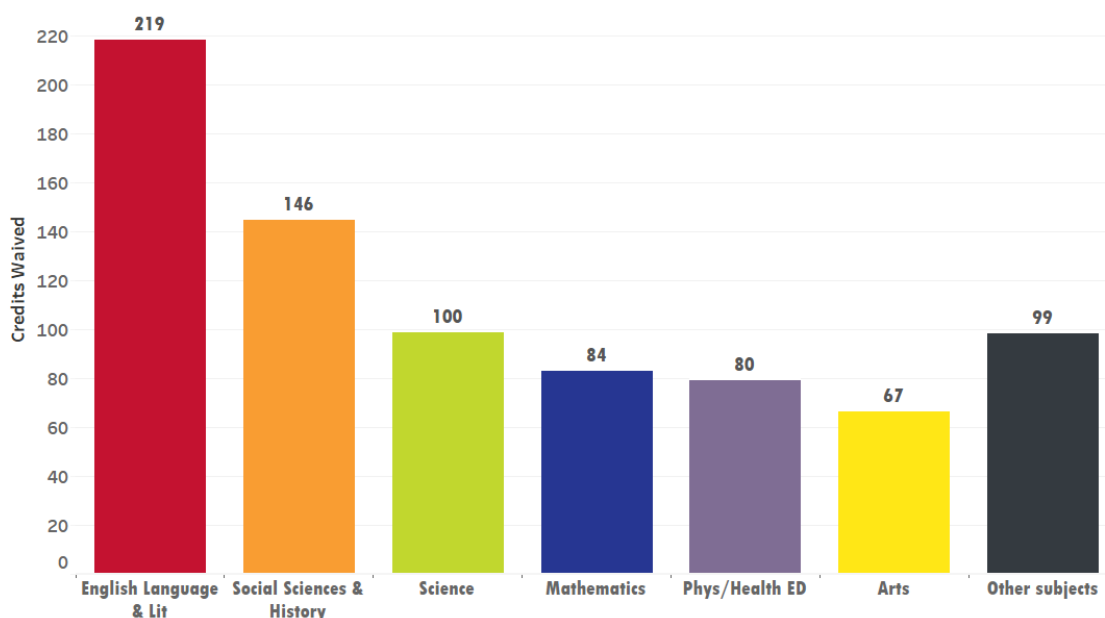
Highline Public Schools had a strong practice of ensuring the waiver was a last-ditch effort for the student. After ensuring that every option was exhausted, if the student needed a waiver, they prioritized waiving requirements (e.g., pathway, 1418 waivers, or other elective credits) that weren't as important for college admission and students' postsecondary plans.

Kent School District shared that in 2020-21 they did issue waivers for core course credits ([core credits](#) are those required for high school graduation) for graduating seniors to help get them through high school; they subsequently have had more conversations around good faith efforts and are carefully checking students are graduating with a diploma that aligns to their next steps. The district is also working on a counselor guide for waivers, to provide additional guidance and intentionality to this process.

Which courses are being waived?

Under SBE's GREW guidelines, no more than 2 elective or core course credits, with only 1 credit per subject area, can be waived per student. Most courses carry 0.5 credits, which means the policy allows a student to waive up to four core courses, and two per subject area. Among Road Map region students who used emergency waivers during the 2020-2021 academic year, most of the credits waived² were core-related subject areas (**Figure 4**).

Figure 4. Credits waived among 12th graders in the Road Map Project region during the 2020-21 academic year



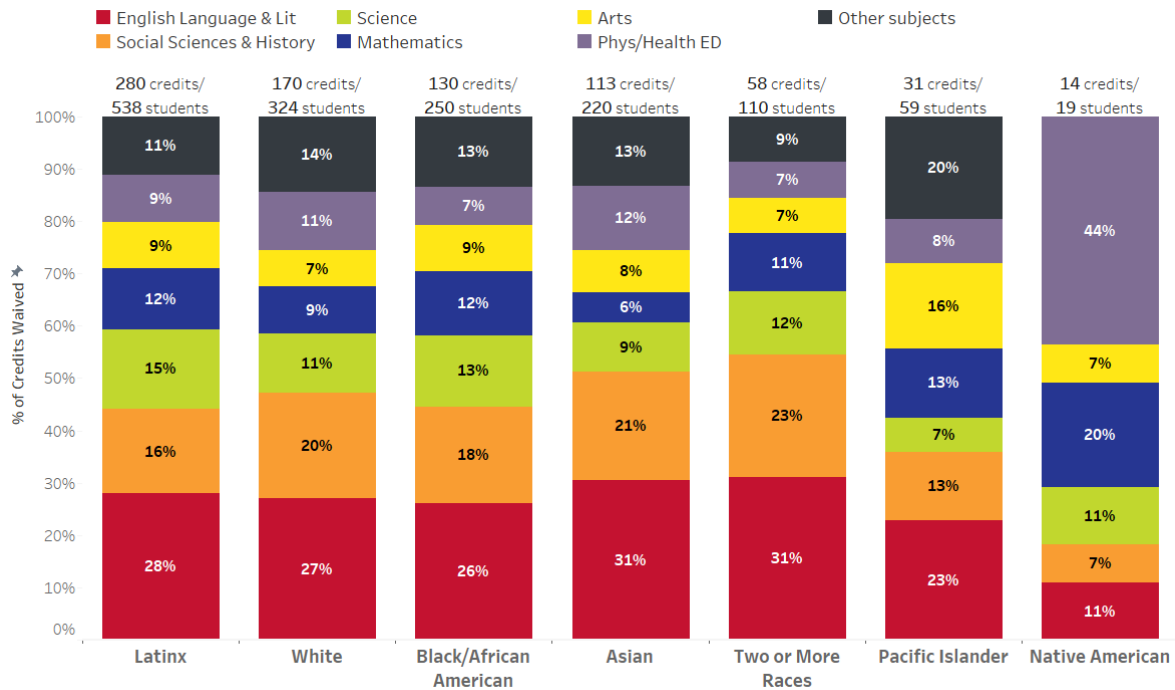
Notes:

Credits were calculated by using the number of attempted credits, when available. When the number of attempted credits was not available, a default of 0.5 credits was assumed. While CTE classes are also considered core courses, they were not easily identifiable in our data and are included in 'other.' See Footnote 1 for information about data source and analysis methods.

² To calculate the number of credits waived, we used the value in the attempted credits field. When this was null, we assumed a default of 0.5 credits.

Figure 5 shows the proportion of credits waived, by subject area, amongst students who received emergency credit waivers. We found that waiving of these core credits was higher for males than females in every group, except Pacific Islanders, and was particularly high for Latinx males within our region.

Figure 5. Credits waived by subject area among Road Map Project 12th graders who received waivers during the 2020-21 academic year



Notes:

Credits were calculated by using the number of attempted credits, when available. When the number of attempted credits was not available, a default of 0.5 credits was assumed. Students' enrollment in their schools (and the region) was calculated by where they were enrolled at the end of the year. While CTE classes are also considered core courses, they were not easily identifiable in our data and are included in 'other.' See Footnote 1 for information about data source and analysis methods.

How waivers affected students

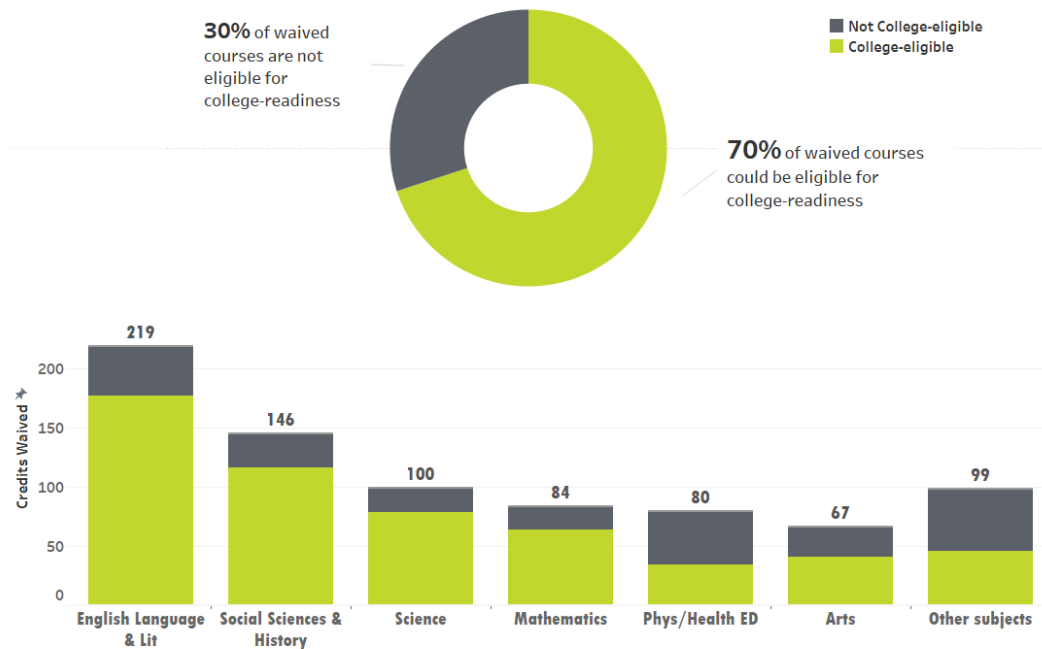


As part of following the SBE's good faith efforts, we know that in certain cases, waivers did help keep students engaged in their last months as seniors in high school. Waivers also supported students whose education was completely disrupted by the pandemic. However, in several conversations about the waivers, people expressed their assumptions that waivers were primarily being issued for elective courses, which wouldn't impact a student's postsecondary trajectory — upon examining the data, we found the opposite to be true.

In addition to a high number of core courses being waived, **nearly 70 percent of these are courses that could meet college requirements (Figure 6)**. In this analysis, we refer to these courses as “college-eligible”³ as they can be used in determining whether students are eligible to apply to four-year colleges, and/or eligible to place into college-level math and English at local community and technical colleges. Washington state four-year college admissions currently allow students to have up to three waivers, but it is unclear whether students will be required to take any of these waived courses later. Of note, these courses that would be free to students if taken during high school, carry a fee if students must take them during college. This reality adds more burden and barriers to college completion for students who cannot cover the additional costs, and it is imperative students fully understand the longer-term implications of waiving college-eligible courses.

³ Courses were categorized as college-eligible if they were ever flagged as meeting the College Academic Distribution Requirements (CADR) designation (Course Designation Code = "B") by the district within the given academic year, or whether it met Math or English college-level placement requirements among RMP community & technical colleges (see: [Inequity by Design](#)).

Figure 6. College-eligibility* of courses waived during the 2020-21 academic year

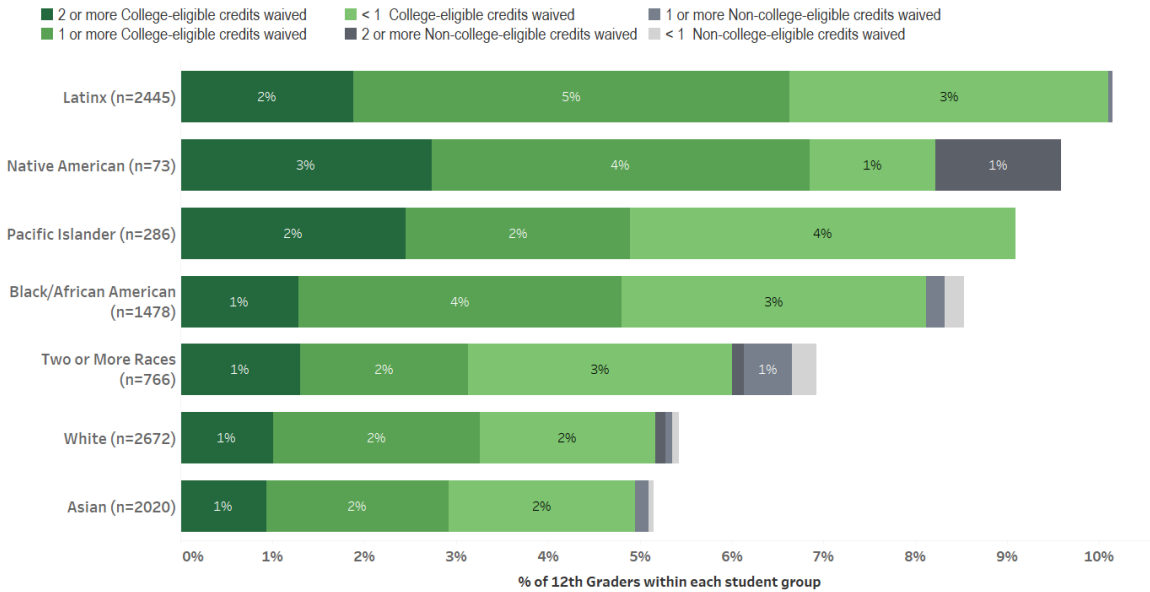


Notes:

Courses were categorized as college-eligible if they were ever flagged as meeting the College Academic Distribution Requirements (CADR) designation (Course Designation Code = "B") by the district within the given academic year, or whether they met Math or English college-level placement requirements among RMP community & technical colleges (see Inequity by Design). Students' enrollment in their schools (and the region) was calculated by where they were enrolled at the end of the year. See Footnote 1 for information about data source and analysis methods.

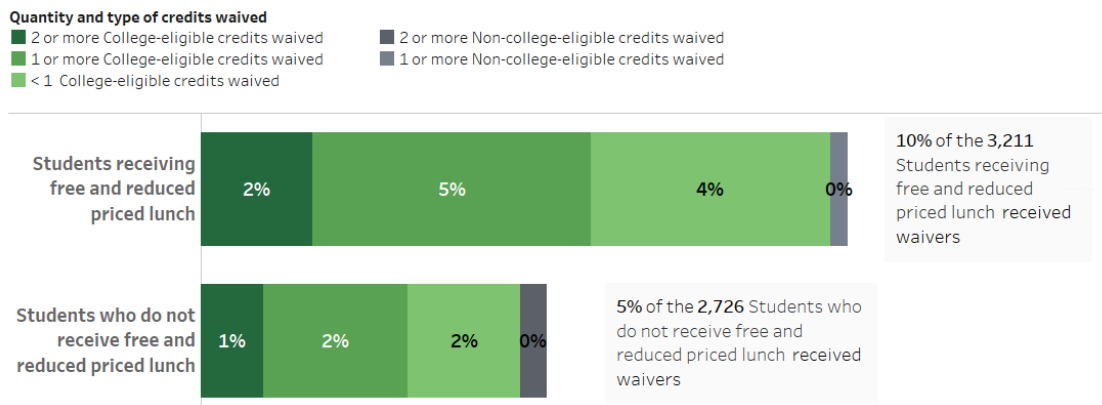
As shown in **Figures 7 and 8**, the impact of the additional costs to students who would have to pay for the waived courses they need to get to college falls disproportionately on students of color and low-income students. These figures show the proportion of each racial/ethnic group who received waivers that may have been college-eligible, broken out by the number of college-eligible (or not) credits that were waived. (*Note: Avoid drawing conclusive comparisons across racial groups because of large variation in the underlying population size of these groups*).

Figure 7. Proportion of Road Map Project 12th graders from each racial/ethnic group who waived college-eligible (or non-college-eligible) credits during the 2020-21 academic year
 (e.g. 2% of the 2,445 Latinx 12th graders waived 2 or more college-eligible credits)



Notes for Figures 7 & 8: A student can be counted in both college-eligible and non-college-eligible credits if they had each type of credit. Courses were categorized as college-eligible if they were ever flagged as meeting the College Academic Distribution Requirements (CADR) designation (Course Designation Code = "B") by the district within the given academic year, or whether it met Math or English college-level placement requirements among RMP community & technical colleges (see Inequity by Design). See Footnote 1 for information about data source and analysis methods.

Figure 8. Proportion of Road Map Project 12th graders who waived college-eligible (or non-college-eligible) credits during the 2020-21 academic year based on income level
 (Based upon free & reduced price lunch – excludes students from South Seattle Public Schools and the Kent School District)



Note: This figure excludes students from Seattle Public Schools and Kent School District because Free & Reduced Priced Lunch data is not provided by these districts. See Footnote 1 for additional information about data source and analysis methods.

Considerations and concerns moving forward



During its May 2022 meeting, the SBE approved the continuation of the emergency waiver program through the 2023-24 school year. As we reflect on how processes have worked so far and who has been impacted, we're left with some questions, including concerns shared by various schools, districts, and programs we spoke with:

- How may the continued use of waivers impact historically marginalized students?
- How do we ensure that students who received waivers get the support they need to be successful in their postsecondary pathways?
 - How are colleges preparing to support these students?
 - How are high schools and colleges communicating and supporting students through their transition to college?
 - How can we ensure that these courses (free for students during high school), don't later create additional costs for marginalized students who may struggle the most with paying for additional courses after they graduate high school? Historically, we have seen the [burden of cost](#) fall disproportionately on students of color and students from lower income households.
 - What supports will colleges offer to ensure students who received waivers can succeed in college? Could colleges waive costs for resource courses — support courses offered alongside college-level courses — to aid students with content waived in high school?
- Is the allowance to waive up to 2 core credits (up to 4 core courses) helping or hurting students? Are there other ways to ease the requirements burden on students to allow them to complete courses that are important for their intended pathways? We encourage limiting waivers for college-ready course credits, while allowing more flexibility to waive requirements that have less impact on students in their intended paths.
- How are we preparing students who were in middle school or early in high school during the pandemic to be successful in meeting all meaningful high school requirements?
- There are concerns that the High School & Beyond Plan — a tool intended to enable every student to plan for and pursue postsecondary education, training, or careers after high school — is serving more as a barrier to graduation than its intended purpose of getting students college-ready. We have heard there is less buy-in from students and staff due to limited support in implementation and a lack of strong connections between students and staff, indicating more relationship building and interpersonal communication needs to happen at all levels. Given these concerns,

we heard waiving HSBP and other pathway requirements would be preferred over waiving credit-bearing courses.

- How are districts ensuring that counselors and administrators understand the full implications for students who are issued waivers and later go on to CTC's?
- Students in foster care, students experiencing homelessness, and highly mobile students need more support. They can get lost in the process, with minimal support. What are the long-term impacts for these students?
- Through our discussions, we learned that other special populations (such as students in Alternative Learning Environment programs) who have been deeply impacted by school closures and the pandemic are not included in the waiver process. This may be because they are on their own path and may already be slated for a longer graduation (beyond four years) time.
- How are students who opted for core course waivers and then pursued a postsecondary path faring? How were they impacted? We would like to hear from students directly.

Next steps

We learned a lot from administrators and next intend to hear from students who did receive waivers, as well as staff working closely with students. We know it is imperative to engage in discussions with students, families, and practitioners across the high school and postsecondary continuum to inform this issue and center those who have the most direct experience with these waivers. We will continue to learn through more conversations and intend to engage further across the Road Map Project region to share what we learn.