Under Chapter 4, school district graduation policies must, at a minimum, include: 1) course completion and grades; 2) completion of a culminating project; 3) demonstration of proficiency in each of the state standards not assessed by a state assessment; and 4) one of the following two main pathways—

**Successful course completion** in which a Keystone serves as the final exam and counts for at least one-third of the course mark; or

**Locally developed, independently validated local assessment systems** that are at least as rigorous as the state-developed Keystones, aligned with state academic standards, and administered to all students.

Section § 4.24 (b)(1)(iv)(B) of the rulemaking provides that locally developed, independently validated assessment systems “may include the use of one or more Keystone Exams.” This language was intended to underscore that state-developed resources are available to all districts, and to provide districts that choose to use local assessments with important flexibility in their design. For example, a district may wish to use Keystone Exams for graduation requirements but local implementation concerns (e.g., a unique grading scale) present challenges for factoring the exam score as one-third of a course grade, as is required under the successful course completion pathway to a diploma. If a district chooses to use Keystones as part of its local assessment system, but not count them for one-third of the course grade, independent validation requirements would still apply.

Districts interested in separating Keystone scores from course grades for purposes of state graduation requirements could comply with the regulation by requiring proficiency or above on Keystone Exams themselves. **Districts that make the local policy decision to use a Keystone Exam**¹ as a stand alone graduation requirement in a given content area would be “deemed approved” for validation requirements in that content area.² As with all administrations of Keystones, students who are not proficient should receive targeted, supplemental instruction and retake the exam at the earliest possible opportunity. After two administrations, students could complete a project-based alternative assessment to raise their score and meet graduation requirements.

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¹ Including the associated project-based alternative assessment
² With state graduation requirements satisfied, district policy could then determine how the Keystone score is factored into the local course grade.