



MANPOWER AND
RESERVE AFFAIRS

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FOR: MILITARY INTERSTATE CHILDREN'S COMPACT COMMISSION
ATTN: EXECUTIVE OFFICE

SUBJECT: Compact Rule Proposal of Sections 1.101 (Definitions) and 4.103 (Graduation)

In accordance with Military Interstate Children's Compact Commission Compact Rules, Chapter 200, Section 2.101, Amendment, prior to the commission voting on any proposed rule or amendment, the text of the proposed rule or amendment shall be published by the Rules Committee and provided to the Commission for review and comments. Commissioners, Commissioner Designees, or Ex-officio Representatives commenting on the proposed rule(s) or amendment(s) on behalf of their state or organization must do so in writing.

Attached is the Department of War's response to the proposed rule Section 1.101 and 4.103.

For questions I may be reached at Dianna.m.ganote.civ@mail.mil or 301-861-8631.

DIANNA GANOTE
Ex-Officio, Department of War
Military Interstate Children's Compact
Commission

Attachment
DoWEA and Service Review

"Equivalent stature" is understandable in plain English, but it is *not* standard or precise terminology in U.S. public education policy. There are clearer, more defensible terms that districts and states actually use for this situation.

Why "equivalent stature" mostly *doesn't* work

- "Stature" is subjective, not legally or administratively defined in education codes.
- Diplomas are not ranked by prestige; they are defined by statutory or regulatory requirements.
- Districts and states generally avoid language that implies hierarchy or value judgment among diploma types.

As a result, "equivalent stature" would be unlikely to hold up in:

- Graduation determinations
- Transcript audits
- State reporting
- Appeals or due-process reviews

Better terminology (recommended)

Here are terms that *do* make sense and align with policy language:

Comparable diploma option

- Emphasizes alignment, not exact duplication
- Commonly used in guidance and internal policy discussions

Most closely aligned diploma"

- Accurate for cases where diploma types don't match one-to-one
- Signals a good-faith equivalency review

Diploma pathway equivalency

- Focuses on coursework and requirements, not labels
- Strong for transfer and waiver documentation

Substantially equivalent graduation requirements

- This is the **most defensible phrase** for official records
- Mirrors language used in credit-transfer and compliance determinations

PROPOSED RULE AMENDMENT

SEC. 1.101 | Definitions

"Equivalent Stature" means: a high school diploma, certificate of completion, or graduation credential that confers a comparable level of academic acknowledgment, scholarly distinction, or special education completion status as the credential the student was actively pursuing in the sending state prior to transition. Equivalence is determined by evaluating the comparability of the academic rigor, coursework, and prerequisites required by both the sending and receiving Local Education Agencies (LEA).

PROPOSED RULE AMENDMENT

SEC. 4.103 | Transfers During Senior Year

(a) Transfers During Senior Year – There may be cases in which a military student transferring at the beginning or during his or her senior year is ineligible to graduate from the receiving LEA after all alternatives have been considered. In such cases the sending and receiving LEA's shall ensure the receipt of a diploma from the sending LEA, if the student meets the graduation requirements of the sending LEA. In the event that one of the states in question is not a member of this compact, the member state shall use best efforts to facilitate the on-time graduation of the student in accordance with Article VII, Sections A and B of ~~this Article~~ the Compact.

(b) Equivalent Stature and Course Waivers – Consistent with Article I, Section B. of the Compact, every effort shall be made by the receiving LEA to ensure that the type of diploma a transferring senior is to receive is of the equivalent stature to that which the student had worked towards in the sending LEA, without placing an unreasonable burden on the student (e.g., requiring additional classes above those required by the sending LEA). If the receiving LEA cannot waive additional courses without damaging the academic integrity of the diploma type being sought, the receiving LEA shall work collaboratively with the sending LEA to facilitate the receipt of a diploma of equivalent statutes from the sending LEA.