

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

Contents

I. GENERAL	1
II. FUNDING, FEES & COSTS	5
III. CURRICULUM & GRADUATION REQUIREMENTS	8
IV. EARNING COLLEGE CREDIT	12
VI. DATA REPORTING AND ACCOUNTABILITY	13

I. GENERAL

1. What is an Early Middle College?

An Early Middle College (EMC) is an extension of the Postsecondary Enrollment Options Act (PA 160 of 1996) and the Career and Technical Preparation Act (PA 258 of 2000), designed to offer students the opportunity to earn a high school diploma and either an associate degree, the Michigan Early Middle College Association (MEMCA) technical certification, an industry-recognized certificate, or 60 transferable college credits at the same time.

2. Is Dual Enrollment the same as enrollment in an EMC?

Dual Enrollment courses are available to all students who meet eligibility requirements as outlined in the MDE's [Dual Enrollment FAQ](#). Students meeting eligibility requirements can enroll in up to 10 postsecondary courses under the Postsecondary Enrollment Options Act (PA 160 of 1996) and the Career and Technical Preparation Act (PA 258 of 2000). The Dual Enrollment laws do not alone prescribe a specific course of study but allow for certain types of courses to be taken when eligibility requirements are met.

In contrast, EMCs are structured programs that use the flexibility with the Dual Enrollment laws to provide a specific and deliberately designed course of study that will result in earning 60 transferable college credits. These credits can be used toward a four-year degree from a Michigan public or private university, an advanced certificate, an associate degree from a community college, or a MEMCA technical certificate or a professional certification.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

Participation in an EMC is declared before the student begins grade 11. **The EMC student must be coded 3500 before the first count day of grade 11.**

3. Is there a simple definition to explain the difference between "Early" vs. "Middle?"

Presently, there are no substantive differences between an "early" or "middle" college, hence the terms are used interchangeably in Michigan. Michigan Early Middle Colleges embed the original middle college design principles and purpose, while requiring dual enrollment in a five-year model. For more details on the varied types of EMC opportunities, please refer to 'Earning College Credit in High School: A Synopsis of Opportunities' at this link:

http://www.michigan.gov/mde/0,4615,7-140-43092_51178---,00.html

4. What is the difference between an Early Middle College High School and a Program?

An Early Middle College **high school** is a "wall-to-wall" stand-alone public high school, a school within a school, a Public School Academy (PSA), or a Shared Educational Entity (SEE) designed to allow a student to earn a high school diploma and either an associate degree, the MEMCA technical certification, or 60 transferable college credits at the same time through an additional fifth year of study.

An Early Middle College **program** is a high school program (within an existing comprehensive high school) designed to allow a student to earn a high school diploma and either an associate degree, the MEMCA technical certification or 60 transferable college credits through an additional fifth year of study. In other words, EMC programs serve a subset of the entire student body in a building, whereas EMC high schools serve the entire student body of a building.

A formal agreement (or Memorandum of Understanding) with each postsecondary partner is required with both the EMC high school and program models.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

5. What is an Enhanced Dual Enrollment System (EDES)?

An "EDES" is a high school instructional model that allows the student to earn 12 college credits by the end of their traditional twelfth grade year (12 x 12). It is intended to be a precursor to opening a full scale 5-year EMC.

6. Is the 12 x 12 Enhanced Dual Enrollment System (EDES) program bound by a credit maximum?

No. The 12 x 12 EDES program is an expectation and goal for the student. Moreover, 12 x 12 programs are designed for 9-12 Enhanced Dual Enrollment systems.

7. How do you become a recognized Enhanced Dual Enrollment System (EDES)? Is there an application?

An EDES is an individual district program of study to increase support for all students engaged in dual enrollment courses. The Department does not formally differentiate between traditional and enhanced Dual Enrollment offerings. No application is required.

8. If an ISD has a formal agreement (Memorandum of Understanding or MOU) with a postsecondary institution, does it apply to/qualify all the constituent districts, especially regarding Enhanced Dual Enrollment Systems?

If a signed MOU exists between all participating districts within the ISD/RESA, then this constitutes a formal agreement between the secondary and postsecondary institutions. All parties (district superintendents and the college president) must sign the Memorandum of Understanding. Participating districts will be verified each year by MDE; hence, some may opt out of the agreement or new districts may choose to opt in.

9. How can an ISD/RESA establish an EMC program?

An intermediate district or regional educational service area may establish a Shared Educational Entity (SEE) to coordinate EMC programs for stand-alone schools only. A SEE could be established if the intermediate district has the correct partnership agreements in place with local district(s). Keep in mind that an intermediate district cannot directly claim FTE for general education students.

10. How does having an EMC program or high school affect Career Center programs?

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

Early Middle Colleges and Career Center programs can coexist and even work in collaboration with one another. EMCs can simultaneously focus on career and technical education (CTE) and postsecondary courses. A CTE Early Middle College program or school is eligible for 61b funding if it has a state-approved CTE program. A CTE program may not earn 61b funding if it does not first have an approved Early Middle College. The secondary state-approved CTE program segments must be delivered and completed before the end of the EMC students' 4th year in high school.

11. If a student is enrolled in an EMC school or program, is the student eligible to participate in MHSAA sports?

Eligible students can participate in athletics with his or her resident district following the requirements provided by the district and the Michigan High School Athletic Association (MHSAA). Please call the MHSAA for specific guidelines 517-332-5046.

Participation in intercollegiate athletics, however, is prohibited by Section 5 of the Postsecondary Enrollment Options Act (MCL 388.515, p. 5).

12. Are homeschooled and nonpublic students eligible to participate in an EMC?

A nonpublic or homeschool pupil is one who receives instruction in at least one course from a nonpublic or homeschool entity. The Postsecondary Dual Enrollment Act requires that students enroll in "essential courses," much like those embedded in a 5-year EMC program of study.

Nonpublic and homeschool pupils are not eligible to participate in EMCs because they are designed to be full-time 5-year educational programs that provide students with a high school diploma and a degree or certificate from the postsecondary institution upon completion, and would include instruction in content areas considered to be essential to the student's education.

That said, a nonpublic pupil may enroll in more than 10 postsecondary courses under normal dual enrollment if the district chooses to support the additional enrollments. The additional courses must still meet the requirements of the Postsecondary Enrollment Options Act 160 of 1996 as well as Section 166b of the State School Aid Act if the student will be claimed in membership (nonessential electives and causes in the subject areas of divinity, religion, physical education, and hobby or craft courses do not qualify), and the student is considered eligible under Section 6 of the State School Aid Act.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

Where can I find a sample Memorandum of Understanding (MOU) between a district and a postsecondary institution?

A sample MOU can be found at this website:

http://www.michigan.gov/mde/0,4615,7-140-43092_51178---,00.html#noprint.

Districts are encouraged to engage the entire EMC design team, including secondary and postsecondary educators, to customize the template and/or develop an MOU to meet individual partnership needs. The MDE also encourages districts to have the final MOU reviewed by legal counsel.

13. Can an EMC have more than one postsecondary partner?

Yes. The EMC should have a primary postsecondary partner, but additional postsecondary partners may be added later, or at the time of application. Either way, the EMC must send an assurance via the signed Memorandum of Understanding (MOU) to MDE that includes a guarantee that the postsecondary partner will report in Student Transcript and Academic Record Repository (STARR). The postsecondary institutions' entity code must be provided on the MOU.

II. FUNDING, FEES & COSTS

1. Who must pay for Dual Enrollment expenses (tuition, registration, books, fees, etc.)? The district or parents?

Under this legislation, districts are required to pay the tuition and mandatory course fees, material fees, and registration fees required for enrollment in an eligible course, unless the costs exceed the prorated percentage of the statewide weighted average foundation allowance. After this amount is exhausted, the district has the option of paying the additional costs using local funding sources, or the parent must pay the remaining costs. For the most recent information on Dual Enrollment costs, please see the MDE's Dual Enrollment FAQ and Calculation Worksheet at www.michigan.gov/dualenrollment

Early Middle Colleges are designed with the intent of providing additional access to postsecondary courses. The maximum number of courses, as well as the handling of costs more than the student's foundation, should be detailed in the MOU between the secondary school and postsecondary institution. In other words, MDE does not impose a cap on the number of courses/credits allowed for Early Middle Colleges. Any limitations should be addressed at the local level inside the MOU.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

2. **What are the rules (if any) regarding Free and Reduced Lunch/Title I funding and EMC students?**

Students attending EMC programs and schools are eligible to participate in the National School Lunch Program (NSLP) and School Breakfast Program. One option is for the EMC to work with a public-school district to enter into an alternate agreement with that district to provide the meals. The school district would be responsible for all administrative responsibilities and would receive the reimbursement for the meals. In this scenario, the public school district is responsible for all administrative duties including the MEGS+ application process, the income eligibility process, and the claim submission. Due to the different designs of EMC programs and school we suggest you work with the School Nutrition Programs (SNP) Unit at the Michigan Department of Education to determine what might be the best fit for your students. The SNP staff are available at phone 517-2415376 or email mde-schoolnutrition@michigan.gov.

3. **Can the EMC program or school district pay for a college-level course described as “developmental” or “remedial” if it is equivalent to the schools’ 12th grade English class?**

It is plausible for an EMC student to take developmental college courses due to scheduling and or school/program location limitations as long as the district local funding sources pay for the associated costs. Section 5GA(B) of the Pupil Accounting Manual gives the district the option of paying for remedial courses if it is in the best educational interest of the student (See Section R 388.155 (2) of the State School Aid Act).

4. **What types of Dual Enrollment courses cannot be funded using state aid?**

The following scenarios do not qualify for state aid under the Postsecondary Enrollment Options Act (see Sec. 388.513(d) for eligible courses):

- Courses not offered for postsecondary credit, or not normally used to satisfy degree requirements.
- Courses already offered by the public/nonpublic school (unless a scheduling conflict prevents enrollment through the school).
- Courses that include a hobby, craft, non-academic activity, or recreation.
- Courses in one of the following subject areas: physical education, theology, divinity, or religious education.
- Subject areas where the student has not achieved a qualifying score on a state-approved readiness assessment. Note: A district may elect to support a

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

student's enrollment in a subject area that the student has not yet achieved a qualifying score if it has been determined to be in the best educational interest of the student.

- 5. Is there anything else needed from the postsecondary institution for the district to receive funding (assuming the district has the required cooperative agreement or Memorandum of Understanding with the postsecondary institution and submitted an approved 5-year EMC educational plan and application for EEM coding)?**

Executing the Memorandum of Understanding (MOU or cooperative agreement) is only one part of MDE's Early Middle College application process. There are several other requirements and assurances that must be met. See the EMC application at this link: http://www.michigan.gov/mde/0,4615,7-140-43092_51178---,00.html

- 6. Can students' families be billed for college courses they fail or withdraw from?**

The repayment clause in the Dual Enrollment law does not apply to an eligible student who does not complete the course due to a family or medical emergency (Sec. 388.514-9b). Moreover, the law states that students "shall" repay, but it also says that districts "may" impose sanctions. In other words, students are responsible for repayment of dual enrolled courses that they fail, but keep in mind that Early Middle Colleges serve as an outreach to underserved, underrepresented, and underachieving students, and as such, philosophically, The MDE is opposed to requiring repayment. For more information, please review the FAQ and law at www.michigan.gov/dualenrollment. Also, see Section 5GA(B) 6&7 of the 2018-2019 Pupil Accounting Manual at this link: http://www.michigan.gov/mde/0,4615,7-140-6530_6605-22360--,00.html

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

III. CURRICULUM & GRADUATION REQUIREMENTS

- 1. When must EMC students be identified and flagged in the MSDS (Michigan Student Data System)? Can it be at the end of 11th grade to ensure that the student is ready and successful in dual enrolled classes that year? Or does it have to be at the beginning of 11th grade?**

Students must declare themselves as an EMC student no later than the fall count date of 11th grade. To declare a student, report them in the MSDS General Collection or Student Record Maintenance Collection with Program Participation Code "3500." This will ensure that the student is counted in the general collection data by CEPI (Center for Educational Performance and Information).

A student can be coded 3500 as soon as the student and parent commit to the 5th year. They do not need to be dual enrolled before coding 3500.

Note: Once a student has been declared an EMC student, they need to be reported with Program Participation Code "3500" in each subsequent collection thereafter. If a student exits the EMC, the 3500 code must be removed from the student's profile in MSDS.

- 2. What happens if a student moves in and out of the five-year cohort once identified? What happens if a student moves to another district?**

If a student moves to a district that also has an EMC program, she/he should enroll in that program and maintain his/her 5-year graduation cohort. If no EMC program is available, then the student becomes a standard 4-year graduate and would be placed in the standard 4-year cohort.

- 3. What happens if a student decides the program is not for them in their senior year? Can they "drop" the EMC and attempt to complete state and district graduation requirements by the end of their senior year (4th year) to graduate?**

The MDE recommends that all students considering admission to an EMC be fully advised of the 5-year commitment. However, once a student is classified as an EMC student, she/he will be enrolled in a program that requires 5 years to graduate with a high school diploma and 60 college credits, with the goal of earning an advanced degree. In other words, when a student commits, she/he must commit for the long haul through the end of the 13th year.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

If a student decides the EMC program is not for them, then the district may remove the 3500 code and the student will return to his/her original four-year cohort. Therefore, when a student completes the state and district graduation requirements, they are considered a high school graduate regardless of their cohort or how many years it took them to graduate. **See page 15, question 8 for additional details.**

Students who graduate with only a high school diploma within the original four-year cohort should be reported as exiting with the appropriate non-EMC graduation code without the Program Participation Code "3500." Their cohort year will revert to the four-year cohort and the students will be considered "on-track" with that cohort. This allows for the rare case of a student who changes his/her mind and wants to graduate with their cohort in four years to still do so, if she/he still completes the final year of math or math related class in his/her final year of high school. This will not impact the school's graduation rate. Instead, the student will simply be removed from the EMC population count and the student will be reset to their original four-year cohort. However, if the school forgets to change that students' 3500 status code, and the student leaves the EMC, the student will be recognized as retained in grade or as a dropout.

4. **What is the process/timeline for getting approval of the MEMCA certificate?**

The MEMCA's Leadership Council approves Career and College Readiness curricula four times each year (April, May, October, and November). Typically, approvals are issued for EMCs one year before the school's first graduating class.

Technical Assistance workshops are held each year for EMCs interested in applying for the MEMCA certification designation. The EMCs must be in their second year of operation and attend a Cluster II workshop to learn about the requirements necessary for earning the right to confer the MEMCA certificate.

5. **How does a school apply to be able to issue a certificate, and must a school issue certificates to get the 5th year funding?**

No, the school does not need to issue MEMCA technical certificates to get the fifth year of funding. The MEMCA member schools work through a process to be approved to grant an EMC MEMCA technical certificate which includes a formal presentation of its Career and College Readiness Curriculum to the MEMCA Leadership Council.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

6. What year should schools place on the student diploma for Early Middle Colleges?

The diploma date must coincide with the EMC students' legal graduation date after he/she has completed all the Michigan Merit Curriculum requirements and local district graduation requirements. Earning the 5th year FTE funding also coincides with this completion.

The act of walking across the stage during the graduation ceremony is a local district decision. The MDE and CEPI recommend that districts place the 5th year on the student's diploma because the high school curriculum is not officially completed until after the 5th year is completed (given that a math or math related course must be taken during the 5th year). School officials should not declare that students eligible to walk across the stage have met ALL graduation requirements if they have not completed the fifth year.

7. What kind of math class qualifies for the final year (5th year) math requirement in an EMC?

The final year math requirement may include classes such as Algebra, Algebra II, Geometry, a personal finance class, or any experience where students use the application of math. The course may be a high school course or a Dual Enrollment course. Also, note that this is a requirement regardless of how many math credits have been previously earned.

8. If a student is flagged as a 5th year EMC student, does the 5th year math requirement mean that they can take 5 years of math? In other words, what if a student completes 4 years of math by the end of the fourth year of their EMC experience, do they still need a final year of math (in their 5th year)?

The state and district graduation requirements state that students must take at least 4 years of math, with one of the math classes scheduled during last year of high school, to graduate. This applies to EMC students just as it does for all other students. So, an EMC student must take a math class during their 5th year of high school and have completed at least 3 years or more of math previously.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

9. If in college classes, what constitutes a full-time high school student?

A full-time college course load equates to 12-16 credits (depending on the postsecondary institution's definition of full-time). A 2-credit college course would equate to one high school class for a six-period day ($2/12 = 1/6$). A 3-credit college course would equate to one high school class for a four-block day ($3/12 = 1/4$). Use the course credits to determine high school class equivalency for those Dual Enrollment courses.

Please refer to 'How to Count the FTE for a Dually Enrolled Pupil' in Section 5-G-A of the Pupil Accounting Manual for sample calculations at the following link:
http://www.michigan.gov/mde/0,4615,7-140-6530_6605-22360--,00.html

10. Do Early Middle College students need to meet the state hours of instruction requirement (1,098 hours under current law) if they are in a college program with fewer hours?

Section 6(4)(q) of the State School Aid Act [MCL 388.1606] states:

"In determining full-time equated memberships for pupils who are enrolled in a postsecondary institution, a pupil shall not be considered to be less than a full-time equated pupil solely because of the effect of his or her postsecondary enrollment, including necessary travel time, on the number of class hours provided by the district to the pupil."

Under this language, a dual enrolled student needs to equate to a full-time student per one of the calculation methods provided in 'How to Count the FTE for a Dually Enrolled Pupil' under Section 5-G-A of the Pupil Accounting Manual.

http://www.michigan.gov/mde/0,4615,7-140-6530_6605-22360--,00.html

Additionally, a district may elect to support a student with a reduced schedule under Section 101(6)(c) of the State School Aid Act [MCL 388.1701], which provides an exception to the 1,098-hour requirement.

11. When does a student take the state assessment exam?

The state assessment exam is administered in the spring to 11th grade students, as well as to students in the 12th grade that have not yet participated in the assessment.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

IV. EARNING COLLEGE CREDIT

- 1. Is it true that if an EMC student does not earn an associate degree or 60 transferable credits along with their high school diploma, that the student will not be considered on-time for graduation and the only other option is for a school district to have their college readiness curriculum approved in two years from the start of their EMC program so students can earn the MEMCA technical certificate?**

Yes, this is correct. To be on-time graduates, Early Middle College schools and programs must allow students to earn an Associate Degree, 60 transferrable credits, OR, the school must be eligible to give the MEMCA Certificate.

To be able to give the certificate, schools must present their college readiness curriculum to the MEMCA Leadership Council and be approved to award the certificate. The certificate allows the student to be an on-time graduate by completing the state graduation requirements, 15 college credits with either 100 hours of community service or 40 hours of career exploration, internship, job shadowing or clinical experience, or a combination of the two that equals 70+ hours. These hours may be experienced and verified throughout the course of the students' high school experience. The only exceptions made are for transfer students or for new schools joining a SEE (Shared Educational Entity). Moreover, the student cannot be otherwise eligible to graduate to participate in the 5th year.

- 2. What is the MEMCA Technical Certificate, and is it recognized by MDE and community colleges?**

The MEMCA Certificate provides verification among the Michigan Department of Education, the school district, and the higher education partner that the graduate has successfully completed each of the following:

- The State of Michigan high school graduation requirements.
- A member school's MEMCA approved College Readiness Curriculum.
- A minimum of 15 college credit hours (non-remedial courses).

AND one of the following options:

- 100 hours of verified community service
- A minimum of 40 hours of verified career exploration, internship, job shadowing, or clinical experience
- A combination of the two that equals 70+ hours

The Michigan Department of Education therefore accepts these students as early college graduates from their approved EMC program or high school.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

VI. DATA REPORTING AND ACCOUNTABILITY

1. **What should a pupil accounting auditor look for as evidence of an EMC pupil enrollment?**

- a. Program of Study (POS) that can be either two, three, four, or five years but every EMC POS must reflect a fifth year.
- b. EDP reflecting the 5th year.
- c. College course schedule.

If any of these evidences are missing the Pupil Accounting Auditor reserves the right to list a finding in the audit.

2. **What happens if a student misses a semester?**

Assuming a PA (pupil accounting auditor) audits all pupils, in all classes each year, and they find an EMC student misses a college semester due to illness or another valid reason, and the student is expected to return, the student shall remain coded 3500 for all three collections. However, from an FTE perspective the district would lose .5 FTE for those pupils.

3. **Who is responsible for checking the non-3500 pupil?**

If the PA finds that the onsite pupil roster does not match the CEPI enrollment data, then an investigation needs to occur.

4. **How is the extra grade level reported in MSDS?**

A student's grade level should be reported based on the high school credits/progress earned toward high school graduation requirements as determined by the local high school or district board of education. A typical high school student following a normal course of study will have grade 9 reported for a student's first year of high school, progressing upward to grade 12 being reported for the students fourth year of high school. Since EMC students will have a fifth year to fulfill diploma and degree/certificate requirements, one grade level must be reported for two consecutive school years. Grade 12 is the only grade level expected to be reported twice in consecutive school years. This means that sequence of grade levels reported for an EMC student, over the course of their high school and 5th year is expected to be 9, 10, 11, 12, 12.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

5. If there are 6 classes in the high school, college adds another one. Does that include an extra day?

If an EMCs pupil schedule exceeds that of the regular high school student, their hours earned will equate to an extra day beyond the 180 days. In other words, if an EMC pupil is enrolled in a mixture of high school classes and college courses that exceed the 1,098 hours per year then the district is eligible to claim extra FTE. The extra FTE shall be determined by the PA. Refer to section 6(4)(kk) in the State School Aid Act of 1979.

Section 6(4)(kk) of the State School Aid Act [MCL 388.1606] states:

"A pupil enrolled in a middle college program may be counted for more than a total of 1.0 full-time equated membership if the pupil is enrolled in more than the minimum number of instructional days and hours required under section 101 and the pupil is expected to complete the 5-year program with both a high school diploma and at least 60 transferable college credits or is expected to earn an associate degree in fewer than 5 years."

6. If a student enters the EMC junior year and gets an offer to a four-year university with a scholarship at the end of his/her 12th grade year, will this hurt the schools' graduation rate if the student is re-adjusted back to a four-year graduation cohort?

Since the EMC student is following a 5-year plan, she/he must take a math course during the fifth year. In other words, for the district to be eligible to receive an FTE for that 5th year, the student must not be otherwise eligible to graduate. Therefore, early graduation is not an option unless the student completes all the state and district graduation requirements by the end of their 4th year, including the requirement of taking a math or math related course during their final year of high school.

A 4-year high school graduate is considered an on-time graduate just as a 5-year EMC graduate is. Therefore, in the case above, this student would not hurt the school's graduation rate.

EARLY MIDDLE COLLEGE AND PROGRAM FAQs

September 2018

7. **Can a student enter the EMC program as a 12th grade student if she/he has taken enough Dual Enrollment courses to match what a student would complete in the junior year of the EMC program? In other words, can you add someone in the 12th grade year if they are on track?**

No. The EMC students must be identified at the beginning of the 11th grade for accountability purposes. The only exceptions made are for transfer students or for new schools participating in an established EMC. Moreover, the student cannot be otherwise eligible to graduate to participate in the 5th year.

Early Middle Colleges are designed with the intent that students will be exposed to postsecondary courses during a minimum of three high school years (i.e., 3rd, 4th, and 5th years) toward the completion of a high school diploma and either an associate degree, the MEMCA certification, industry-recognized technical certification, or 60 transferable college credits at the same time.

8. **If we code students 3500 this year and then they decide not to participate, won't local districts have an issue with their graduation rate?**

If the 3500 Program Participation code is removed prior to reporting the student as graduating, the cohort year reverts to the original 4-year expected graduation year and their graduation/cohort status is determined using the original cohort year. To be an on-time graduate, students need to be reported with the appropriate graduation code on or before August 31 of the cohort year. For EMC participants, students need to be reported with exit code 40 before August 31 of their current cohort year (5th year) to be on-time. Any other codes put them as off-track.