



California Alternative Pathways to a High School Diploma Workgroup Report

Provided to the chairs of the relevant policy committees and budget subcommittees of the Legislature, the Executive Director of the State Board of Education, the Superintendent of Public Instruction, and the Director of Finance

Authorized by the Budget Act of 2020, Senate Bill 74

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Special Education Division*

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1. SUMMARY

The Alternate Pathways to a High School Diploma (Alt Pathways) Workgroup, authorized by the Budget Act of 2020, Senate Bill 74, met from December 2020 to July 2021 to make recommendations to the California State Legislature, State Board of Education, Department of Education, and Department of Finance pertaining to the examination of existing and potential additional pathways to a high school diploma for students with disabilities. Since its inception, California's state accountability system, through its dashboard, has identified students with disabilities as the student group with the lowest high school graduation rate compared to all other measured student groups.

The legislation specifically charged the Alt Pathways Workgroup with studying existing and developing new alternate pathways for students with disabilities to access the core curriculum in order to satisfy the requirements for a high school diploma; developing an alternate diploma aligned to the state's alternate achievement standards for students with significant cognitive disabilities, consistent with federal law; and other related matters necessary to meet the purpose set forth in this provision.

The workgroup established a common, foundational vision to guide their work: that all students with disabilities, including students with significant cognitive disabilities, should enter high school knowing they have the opportunity to earn a high school diploma. The workgroup agreed in order to realize this vision, California's education system must both provide clearly articulated pathways for every student to earn a high school diploma, and ensure students, families, and educators clearly understand and are able to plan for how each individual student can access all of the learning and necessary requirements a to earn a high school diploma.

Consistent with current federal law contained within the Individuals with Disabilities Education Act (IDEA), every student with a disability should have an opportunity to earn a high school diploma that allows them to pursue any postsecondary college, training, or employment options, and meaningfully and fully participate in their community. The expectation under the IDEA is that every student receives the support and services they need in order to access the same opportunities as their peers without disabilities. This includes a high school diploma. In the spirit of the IDEA, and equality of opportunity for students with disabilities, the recommendations developed by the Alt Pathways Workgroup attempt to identify existing barriers to earning a high school diploma for students with disabilities and explore the opportunity to develop a pathway for students with significant cognitive disabilities to also obtain a high school diploma (based on the state's alternate achievement standards). Historically, this latter group of students has received a high school certificate of completion in lieu of a high school diploma, which has proven challenging when attempting to gain competitive integrated employment and access to postsecondary opportunities because the certificate of completion is not formally or widely recognized within the business communities or institutes of higher education (see section 5.E.ii).

The workgroup agreed and research supports that participating in high-quality core instruction in the general education classroom to the greatest extent possible produces the best outcomes for students with disabilities. Access to the core curriculum through supports and accommodations as detailed in an individualized education program (IEP), and early, thoughtful transition planning must set the stage, so that general and special education teachers, staff, and families have a road map in how to support each student

with a disability to access their grade-level standards, and ultimately earn a high school diploma.

Although SB 74 charged the workgroup with developing recommendations pertaining to developing “...new alternate pathways for students with disabilities to access the core curriculum in order to satisfy the requirements for a high school diploma”, in addition to “...developing a new alternate pathway for students with significant cognitive disabilities to earn a high school diploma”, the workgroup concluded that in lieu of creating a set of new alternate pathways (other than creating a new pathway for students with significant cognitive disabilities), the state should increase access to the full range of pathway options already provided all students, and in some cases, currently afforded to specific named student groups. This includes better access and support for students with disabilities to meet existing state and local requirements for earning a regular diploma, and the allowance for some students with disabilities to earn a diploma through meeting state requirements for graduation only. The workgroup warned that creating separate pathways for students with disabilities could lead to the perpetuation of existing siloes between general and special education and exclusion of students with disabilities in rigorous high school coursework and postsecondary opportunities.

Therefore, the workgroup recommended that in addition to maximizing California’s existing diploma pathways, the state should create only one brand new pathway, specifically for students with significant cognitive disabilities, who currently do not have a pathway to a diploma. It was also recommended that California provide better access to two existing traditional pathways to earning a high school diploma for the majority of students with disabilities. The workgroup supports:

1. A newly defined high school alternate diploma-pathway exclusively for students with significant cognitive disabilities, that allows high school diploma attainment through meeting state minimum course requirements using California’s Alternate Achievement Standards, and that also meets federal graduation criteria for state accountability;¹
2. Equitable access across all California local educational agencies (LEAs) to an existing diploma-pathway option that only requires meeting the minimum state standards for graduation and not additional local requirements. This allowance should be determined on an individual student basis with the IEP team expectation always starting with how a student can meet all state and local requirements for graduation. This opportunity would allow for the IEP team to carefully determine that the student would benefit from only meeting state (and not local) minimum graduation requirements, and to essentially waive local requirements for graduation; and
3. A significant increase in statewide guidance, training, and technical assistance, to allow greater access for students with disabilities to all existing traditional high school courses and pathways, with the expectation that most students will meet all state and local high school graduation requirements.

For the purposes of this report, “diploma-pathway(s)” refers to distinct ways of meeting specific statutory graduation requirements and does not denote the specific educational

¹ This pathway aligns to the “state-defined alternate diploma” as allowed by ESSA.

model used to meet such requirements, for instance career technical education (CTE) pathways, traditional high school pathways, or regional occupational programs.

2. INTRODUCTION: EQUAL OPPORTUNITY FOR CALIFORNIA STUDENTS WITH DISABILITIES

After decades of exclusion, segregation, and lack of access to educational opportunities for students with disabilities, the federal IDEA codified the rights of children with disabilities to have the same opportunities afforded their peers without disabilities. In further describing its intent, Congress stated that the purposes of the IDEA include:

To ensure that all children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living. [20 U.S.C. 1400(d)(1)(A)]

Over the past decade, California has been making positive strides toward the promise of opportunity for each and every student with or without a disability to leave the kindergarten through grade twelve (K–12) public education system with the knowledge, tools, and support necessary to choose their postsecondary, employment, and life path and fully participate in our democracy. This promise of greater educational equity has been advanced through significant changes to California’s education system, including an overhaul to both its education funding mechanism and its accompanying accountability system, which delineates the group of students categorized as students with disabilities.

Coined the Local Control Funding Formula (LCFF), California’s general education funding formula is designed for all students, including students with disabilities.

Combined with augmented state special education and federal IDEA funding and accountability, the LCFF seeks to ensure students with disabilities receive the support and services they need to realize the same equality of opportunity as their peers without disabilities. Significant policy shifts and financial incentives toward creating and supporting more inclusive educational settings for students with disabilities, beginning at the earliest age, have prompted local educational agencies (LEAs) to backward map from high school diploma attainment to preschool to ensure planning, learning opportunities, access, and person-centered goals ultimately lead to improved school and community inclusion, high school graduation rates, postsecondary outcomes, and employment from the moment a child enters the education system.

California *Education Code* 33080 states, “Each child is a unique person, with unique needs, and the purpose of the education system of this state is to enable each child to develop to his/her/their full potential.” This commitment, as evidenced in California law, reminds us to stay vigilant in asking which of California’s students are struggling to achieve, and which students are leaving the K–12 system without the knowledge, tools, and support necessary to choose their path to employment and, ultimately, a family sustaining wage. The answers to these questions are reflected in the low rates of diploma attainment and employment and high rates of poverty experienced by individuals with disabilities across the state.

Through a number of state and federal initiatives, studies, and grants, California has begun—and is in the process of—studying and learning what existing policy and practice barriers continue to stand in the way of prosperity and equity for students and individuals with disabilities, and how the system collectively can eliminate barriers to

post-school employment while improving access, knowledge, and skills for future success and life choice.

One such initiative and driver shines a bright light and creates a greater call to action toward the need for improving access and opportunities for students with disabilities in the state. The California Competitive Integrated Employment (CIE) Blueprint, “Real Work for Real Pay in the Real World,” calls for employment for all Californians with intellectual disabilities and developmental disabilities.²

In the spring of 2017, the California Department of Education (CDE), California Department of Rehabilitation (DOR), and the California Department of Developmental Services (DDS) created the CIE Blueprint. Launched in 2014, the Blueprint initiative was the result of the commitment between the three departments to provide opportunities for Californians with intellectual disabilities and developmental disabilities, regardless of the severity of their disability, to prepare for and participate in competitive integrated employment, otherwise known as “real work for real pay.”

At the same time as cross-agency work on the CIE initiative was rolled out, the federal Workforce Investment and Opportunity Act (WIOA) focused on ensuring opportunities for individuals with disabilities in the workforce. Despite the ongoing progress of these

² California Department of Education, California Department of Rehabilitation, California Department of Developmental Services. May 2017. *Employing Individuals with Intellectual Disabilities and Developmental Disabilities in California: ‘Real Work for Real Pay in the Real World.’*
https://www.sbccc.edu/extendedlearning/sb_adult_ed_consortium/files/AWD%20AEBG%20YR3%201718%20California%20Competitive%20Integrated%20Employment%20Blueprint.pdf.

initiatives, one large, looming barrier persists: many students with disabilities leave the K–12 system without a high school diploma.

The high school diploma is both a rite of passage and the culmination of a student's educational accomplishments in K–12. It signals the completion of a set of learning standards at each grade-level that every student is expected to learn, regardless of a disability or exceptional learning need, and is universally recognized as an essential qualifying document for employment and postsecondary education. As such, the importance of creating access to learning for all students is directly correlated with students leaving K–12 with knowledge, critical thinking skills, and the ability to read, write, and do math—all of which are contained within grade-level learning standards. California's embrace of and commitment to Universal Design for Learning and other research-based instructional practices and supports are critical vehicles to achieving this equity of opportunity and access to learning, and directly map to students with disabilities achieving and earning a high school diploma.

There was unanimous agreement from the experts, practitioners, and educators from across the state who comprised the Alt Pathways Workgroup that diploma attainment, along with appropriate preparation for employment and life, remains a challenge for many students with disabilities. Workgroup members envision a future in California in which all students with disabilities enter high school knowing they have the opportunity to earn a high school diploma.

If California is committed and works to ensure every child educated in the state—regardless of their severity of disability or level of support need—has an opportunity to

earn a high school diploma, be prepared to access a postsecondary or employment path of their choice, and ultimately obtain employment that can earn them a family sustaining wage, and as a result the large gap in opportunities and outcomes will begin to shrink, resulting in a brighter future for students and individuals with disabilities.

3. WORKGROUP CHARGE AND FORMATION

The California State Budget Act of 2020 allocated federal IDEA funds for the purpose of convening a workgroup to examine and propose alternate pathways to a high school diploma for students with disabilities, with the following specifications:³

- (a) The workgroup shall include, but not be limited to, representatives of the State Department of Education, the Department of Rehabilitation, the State Department of Developmental Services, local educational agencies, special education local plan areas, legislative staff, and relevant state and national policy experts. The workgroup shall examine and develop recommendations regarding the following matters:
 - (1) Studying existing and developing new alternate pathways for students with disabilities to access the core curriculum in order to satisfy the requirements for a high school diploma.
 - (2) Developing an alternate diploma aligned to the state's alternate achievement standards for students with significant cognitive disabilities, consistent with federal law.
 - (3) Other related matters necessary to meet the purpose set forth in this provision.

The CDE contracted with the Sacramento County Office of Education (SCOE) to convene the Alt Pathways Workgroup to fulfill the charge described above. The 35-member workgroup met regularly between December 2020 and July 2021.⁴ During

³ California SB 74, Mitchell. Budget Act of 2020.

⁴ For the full list of workgroup members, see appendix A.

these meetings, workgroup members developed a common vision for the work and reviewed and discussed California's existing high school diploma framework, existing barriers and challenges for students with disabilities, relevant state and federal laws, current and historical data about students with disabilities in California, and examples of other state approaches to providing alternate pathways to a high school diploma for students with disabilities.

The workgroup engaged external stakeholders through surveys and presentations to inform the recommendations. Key stakeholder engagement activities included presentations during public meetings of the California Advisory Commission on Special Education, a public statewide webinar with over 300 registered participants, and a stakeholder survey that gathered feedback from over 900 respondents from across California.

A full list of workgroup members is provided in appendix A. Additional information about the workgroup process is provided in appendix B.

4. WORKGROUP VISION

The Alt Pathways Workgroup collaboratively developed a set of vision statements for the future and revisited them at each meeting to ensure all work and decisions were aligned with achieving this vision in California.

The workgroup envisions a future in which:

- All students with disabilities in California enter high school knowing they have the opportunity to earn a high school diploma.

- Students with disabilities, including those with significant cognitive disabilities, exit the K–12 education system with both a high school diploma and a set of skills that prepares them for the opportunity to earn a family sustaining wage and meaningfully participate in their communities.
- Students, families, and teachers understand the requirements each individual student must meet to earn a diploma and collectively ensure, through the IEP process, that there is a clear plan in place for supporting each student in achieving all of the requirements necessary to earn the diploma.

The workgroup agreed that the future they envision for students with disabilities and the access to information necessary for the adults that support them are attainable, but will require some alterations to the current system, structures, policies, and practices. The recommendations contained herein represent the workgroup’s best thinking about the types of changes, including training, and culture shifts, that will be needed to achieve this vision.

5. BACKGROUND AND CONTEXT

The Alt Pathways Workgroup reviewed and discussed existing state and federal policies related specifically to high school graduation and diplomas, data about students with disabilities, and current barriers to all students having the opportunity to earn a high school diploma. Deep discussion occurred about both system complexities and variability across the group of students who qualify for special education and related services. The breadth of background information provided in the following sections is critical to laying a foundation for understanding the multitude of issues and considerations culminating in low diploma attainment for students with disabilities and

the opportunities for improvements to the existing system. In order to make recommendations for a new pathway for students with significant cognitive disabilities, and to better understand what is causing such low diploma attainment for the remainder of students with disabilities, the workgroup received detailed information designed to ignite discussions and consensus building over many months.

5.A. INFORMATION ABOUT STUDENTS WITH DISABILITIES IN CALIFORNIA

In accordance with federal law, California provides individualized special education and related services for students identified as having at least one qualifying disability.⁵ In the 2019–20 school year, 804,101 students from birth to age twenty-two received special education services, which includes 752,391 K–12 students (12.2 percent of all K–12 students in California).⁶ This represents over a 2 percent increase in the number of K–12 students with disabilities since the 2009–10 school year.⁷ The majority (70 percent) of students with disabilities in California are also represented in one or more of the student subgroups that the state has deemed to be high-need, which include English

⁵ California *Education Code* Section 56026 refers to the following definition of “child with a disability” from Section 1401(3)(A) of Title 20 of the United States Code: “a child (i) with intellectual disabilities, hearing impairments (including deafness), speech or language impairments, visual impairments (including blindness), serious emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments, or specific learning disabilities; and (ii) who, by reason thereof, needs special education and related services.”

⁶ California State Board of Education. January 2021. *Agenda Item #16*. <https://www.cde.ca.gov/be/ag/ag/yr21/documents/jan21item16.docx>.

⁷ California Department of Education. DataQuest census report. <https://dq.cde.ca.gov/dataquest/>.

learners, low-income students (defined as a student receiving a free or reduced-price meal), and foster youth.⁸

Students with disabilities include a diverse group of students with individualized experiences and learning needs. In accordance with federal requirements, California data systems collect information about the primary disabilities of California's students using federal primary disability categories.⁹ The most common primary disabilities experienced by California students include: Specific Learning Disability (37.16 percent), Speech or Language Impairment (20.78), Autism (15.58 percent), Other Health Impairment (13.6 percent), Intellectual Disability (5.33 percent), Emotional Disturbance (3.18 percent), Hard of Hearing (1.27 percent), and Orthopedic Impairment (1.1 percent).¹⁰ Within each of these disabilities categories rests a range of support needs from mild to extensive.

5.A.i. Variability in the Students with Disabilities Student Group

Students with disabilities are often described, measured, and reported as one singular, homogenous group of students, separate from the general population of students without disabilities, despite the reality that these students possess a vast range of disabilities and support needs. In recent years, there have been local, state, and national discussions about the use of the terms "general education" and "special education" when referring to students as separate groups, resulting in declarations by

⁸ California State Board of Education. January 2021. *Agenda Item #16: Presentation from Heather Calomese, Special Education Division, California Department of Education.*

⁹ California Department of Education. Last review May 15, 2020. CALPADS Primary Disability Category Codes. <https://www.cde.ca.gov/ta/tg/ca/disablecodes.asp>.

¹⁰ California State Board of Education. January 2021. *Agenda Item #16.*

educators, stakeholders, and advocates that “students with disabilities are general education students first.” This statement alludes to the fact that all students are by definition general education students, and some of the general education students may also require special education and related services to access their education.

Traditional labels of a student being either a “general education student” or a “special education student” are becoming a thing of the past, as a move towards more inclusive settings increases, and label-driven classrooms, disability-focused teaching credentials and tracks for students with more significant support needs decrease. For the purposes of this report, it is important to underscore how using a disability-specific label, using a label of “general ed student” versus “special education student”, or identifying a student by the level of support a student may require to access their education (For example, mild/moderate, moderate/severe), often impacts a student’s access to grade-level instruction and ultimately their pursuit of or opportunity to receive a diploma.

For discussion purposes and to better articulate the multiple pathways to receiving a diploma, the workgroup concurred that it is helpful to think about informal generalized groups within the students with disabilities student group. The three groupings described below may help policymakers better understand and envision potential high school paths for students who access a variety of instructional needs and accommodations and what it might take to meet the requirements of a high school diploma.

It is important to note that these informal groupings are generalizations and are included to illustrate the heterogeneity of the students with disabilities student group. They are only to be used as an illustration of how to think about ensuring the state meets the

unique and individualized needs of this diverse group. The multiple diploma-pathway options described (other than the pathway suggested for students with significant cognitive disabilities) are not intended to be used as categories for any particular disability type or level of support needs.

Group 1: This generalized group represents students with significant cognitive disabilities) who take the California Alternate Assessments (CAAs) throughout their education (see section 5.D.ii for California’s definition of significant cognitive disabilities and a description of the CAAs). The CAAs are based on the California Alternate Achievement Standards which were developed specifically for students with significant cognitive disabilities to be able to access the same California State Standards as their peers without disabilities, just in a modified format.¹¹ Federal law allows states the use of the alternate assessment for approximately 1 percent of all students in the state. These students who receive special education and related services, typically require extensive support, including direct individualized instruction and significant academic support to achieve measurable gains in their grade-level standards. In current practice, this group of students typically earn a state allowable certificate of completion and are not eligible for a high school diploma (see section 5.B.i for high school diploma requirements and section 5.E.ii for additional information on the certificate of completion).

¹¹ Thurlow et al. 2017. “NCEO Report 406: Alternate assessments for students with significant cognitive disabilities: Participation guidelines and definitions.” *National Center on Educational Outcomes*.
<https://nceo.info/Resources/publications/OnlinePubs/report406/default.html#:~:text=%E2%80%9CThe%20student%20has%20a%20SIGNIFICANT,and%20self%2Dcare.>

Group 2: This generalized group of students, who receive special education and related services, likely need a moderate level or more specialized support through individualized academic instruction and accommodations to meet grade-level standard expectations. They might require both specialized academic instruction or small group instruction, or additional time to master the content standards of a specific grade-level or course. Members of the workgroup discussed the example of California's current Algebra 1 graduation requirement. They reported that some students in this group may struggle to master all of the required content in the traditional time allotted but might be able to achieve proficiency if allowed more time (For example, multiple semesters at a slower pace), and intensive support to fully access and learn the content. In such a scenario, these students may benefit from the opportunity to earn a high school diploma based on the state minimum requirements for graduation without having to meet additional local requirements.

Group 3: This generalized group of students represent the majority of students with disabilities, who receive special education and related services that will allow them to access and meet the same grade-level academic standards and expectations and complete the same course requirements (state and local) for graduation as their non-disabled peers.

While each student with a disability has their own unique learning needs, and the purpose of the IEP is to customize for each student, so they can access their education, enough flexibility needs to exist in the system to allow for this customization. The generalized groupings previously described were created to help policymakers visualize

some of the variation within this student group and to help ensure a pathway to a high school diploma exists for the full range of students with disabilities.

5.A.ii. Current Graduation Rates for Students with Disabilities

The workgroup reviewed state-level data to understand what proportion of students with disabilities in California graduate with high school diplomas. The workgroup found that the state’s graduation rate for students with disabilities are far below both the state’s target performance measures and the state’s graduation rate for the general student population. In the 2019–20 school year, 67.7 percent of all students with disabilities graduated from high school with a regular diploma using an Adjusted Cohort Graduation Rate (ACGR), well below the state’s performance target of 90 percent.^{12 13} In contrast, California’s statewide ACGR for “all students” in the 2019–20 school year was 84.3 percent.¹⁴ This data illustrates the urgent need for California to examine and strengthen opportunities provided for students with disabilities to earn a high school diploma.

¹² California State Board of Education. January 2021. *Agenda Item #16*.

¹³ California measured and reported graduation data using the ACGR for students with disabilities for purposes of IDEA federal accountability up until the 2019–20 school year, the most recent year that state data was available for workgroup review. The ACGR is the percentage of freshmen that graduate with a regular high school diploma within four years of starting ninth grade and is adjusted to account for students who immigrate from another country, emigrate to another country, and transfer into or out of the cohort after 9th grade.

¹⁴ California Department of Education. December 2020. *California Department of Education Releases 2019–20 High School Graduation and Dropout Rates*. <https://www.cde.ca.gov/nr/ne/yr20/yr20rel101.asp>.

5.B. REQUIREMENTS FOR EARNING A REGULAR HIGH SCHOOL DIPLOMA

The workgroup closely examined the current graduation requirements for earning a regular high school diploma in California, including both state and local requirements and allowable waivers to such requirements.

5.B.i. California High School Graduation Requirements

Students in California, including students with disabilities, must complete state and LEA requirements for graduation to earn a regular high school diploma. *California Education Code (EC)* Section 51225.3 establishes state minimum requirements for graduation that include 13 courses of preparation and any “other coursework requirements adopted by the governing board of the school district.”

Each LEA has autonomy to choose whether to require additional coursework for graduation. However, many LEAs choose to adopt the University of California and California State University coursework requirements for freshman admissions—known as the “A–G courses”—in addition to the state minimum requirements to ensure that all students graduate ready to enter a four-year college. According to a 2017 survey from the Public Policy Institute of California, 51 percent of LEAs required students to complete the A–G courses to receive a high school diploma, including some of the state’s largest LEAs and LEAs with significant numbers of high-need students.¹⁵ Given the widespread use of the A–G course requirements, the workgroup reviewed both the

¹⁵ Public Policy Institute of California. 2017. *Just the Facts: California’s High School Graduation Requirements*. <https://www.ppic.org/publication/californias-high-school-graduation-requirements/>.

current state minimum course requirements and the A–G course requirements. Table 1 below summarizes and compares these two sets of requirements.

Table 1: California Minimum Course Requirements for Graduation Compared with A–G Course Requirements

Subject Area	State Minimum Course Requirements ¹⁶	A–G Course Requirements ¹⁷
English	Three years	Four years
Math	Two years (including Algebra I)	Three years (including the topics covered in elementary and advanced algebra and two- and three-dimensional geometry)
Social Studies/ Science	Three years (including US history and geography; world history, culture, and geography; one semester of American government; and one semester of economics)	Two years (including world or European history, cultures, and geography; and US history or one semester of US history and one semester of civics or American government)
Science	Two years (including biology and physical science)	Two years (including biology, chemistry, or physics)

¹⁶ California *Education Code* Section 51225.3.

¹⁷ University of California. Subject Requirement (A–G).

<https://admission.universityofcalifornia.edu/admission-requirements/freshman-requirements/subject-requirement-a-g.html>.

Subject Area	State Minimum Course Requirements ¹⁶	A–G Course Requirements ¹⁷
Foreign Language	One year of either foreign language (including American Sign Language) or visual and performing arts. LEAs may allow a CTE course to satisfy this requirement.	Two years (must be in the same language other than English, may include American Sign Language)
Visual and Performing Arts	One year of either foreign language (including American Sign Language) or visual and performing arts. LEAs may allow a CTE course to satisfy this requirement.	One year (including dance, music, theater, visual arts, or interdisciplinary arts)
Physical Education	Two years	Not Applicable
Electives	Not Applicable	One year
Total	13	15

5.B.ii. Waivers

California allows LEAs to request the State Board of Education (SBE) to grant a full or partial waiver from specific graduation requirements for individual students with

disabilities.¹⁸ Members of the workgroup shared that the Algebra I requirement was particularly challenging for students with disabilities, and that waivers were one way that this challenge is mitigated. According to the CDE, “Some students with disabilities, due to the specific nature of their disability, may request a waiver of the Algebra I graduation requirement if, after all support services have been provided, the student cannot pass the course.”¹⁹ However, the CDE also states that “review and approval of these waivers will be stringent.”²⁰

5.C. PATHWAYS TO ACCESS THE CORE CURRICULUM TO SATISFY THE REQUIREMENTS FOR A HIGH SCHOOL DIPLOMA

The workgroup learned that there are existing statutory provisions that offer local flexibility to how graduation requirements are met, and that LEAs are currently required to offer alternative ways for students to access the core curriculum to satisfy the requirements for a high school diploma and to demonstrate their skills and competencies. The workgroup aimed to better understand what is currently allowed under state law to determine what might be necessary statutory or regulatory changes versus what challenges are more a result of historical practices and beliefs about students with disabilities.

¹⁸ California *Education Code* Section 56101.

¹⁹ California Department of Education. “High School Graduation Frequently Asked Questions.” <https://www.cde.ca.gov/ci/gq/hs/hsgrfaq.asp>.

²⁰ California Department of Education. “Algebra I/Mathematics I Graduation Requirements.” <https://www.cde.ca.gov/ci/gq/hs/algebrafaq.asp>.

5.C.i. Statutory Precedent for Multiple Pathways to a Diploma

Current California *EC* provides authority for various ways students can complete high school graduation requirements to earn a diploma. Existing laws require LEAs to adopt alternate means for students to complete a course of study to earn a diploma, including CTE and supervised work experience, among others. Specifically, California *EC* Section 51225.3 states:

(b) The governing board, with the active involvement of parents, administrators, teachers, and pupils, shall adopt alternative means for pupils to complete the prescribed course of study that may include practical demonstration of skills and competencies, supervised work experience or other outside school experience, career technical education classes offered in high schools, courses offered by regional occupational centers or programs, interdisciplinary study, independent study, and credit earned at a postsecondary educational institution. Requirements for graduation and specified alternative modes for completing the prescribed course of study shall be made available to pupils, parents, and the public.²¹

For students with disabilities in grades 7–12, *EC* Section 56345(b)(1) indicates that the IEP shall include “any alternative means and modes necessary for the pupil to complete the prescribed course of study of the district and to meet or exceed proficiency standards for graduation.”²²

Additionally, California *EC* Section 51225.1 allows students identified within five specific student groups (these do not include students with disabilities) who may face extraordinary circumstances (specifically described in 51225.1) to earn a high school

²¹ California *Education Code* Section 51225.3.

²² California *Education Code* Section 56345.

diploma based solely on the state minimum graduation requirements, without having to meet any additional local graduation requirements:

(a) Notwithstanding any other law, a local educational agency, as defined in subdivision (n), shall exempt a pupil in foster care, as defined in Section 51225.2, a pupil who is a homeless child or youth, as defined in Section 11434a(2) of Title 42 of the United States Code, a former juvenile court school pupil, as defined in Section 51225.2, a pupil who is a child of a military family, as defined in Section 49701, or a pupil who is a migratory child, as defined in subdivision (a) of Section 54441, who transfers between schools any time after the completion of the pupil's second year of high school, or a pupil participating in a newcomer program, as defined in Section 51225.2, and who is in his or her third or fourth year of high school, from all coursework and other requirements adopted by the governing body that are in addition to the statewide coursework requirements specified in Section 51225.3, unless the local educational agency makes a finding that the pupil is reasonably able to complete the local educational agency's graduation requirements in time to graduate from high school by the end of the pupil's fourth year of high school.

The workgroup discussed this particular provision as one potential path to consider in allowing students with disabilities to only have to meet state and not local requirements for earning a high school diploma. However, it was noted that an exemption from having to meet local requirements in addition to state graduation requirements would not be appropriate for "all" students with disabilities. Such an exemption, if legislated, might have the unintended consequence of lowered expectations for students with disabilities who are able to meet all local graduation requirements that exceed the state requirements. There are also concerns that a sweeping statewide exemption for all students with disabilities could lead to equity issues and concerns about whether a student was truly receiving a free, appropriate, public education under federal law, with "appropriate" potentially arguable and not individualized if all students with disabilities were exempted from local (more rigorous) requirements. In addition, despite some

workgroup members strongly advocating for adding students with disabilities to the list of student groups eligible within this provision, it was recognized that there are a number of additional requirements included in this provision allowing only some students in these groups to qualify to only have to meet the minimum state standards for graduation. Therefore, if the state were to decide to create a similar exemption to meeting local graduation requirements for some or all students with disabilities, new statutory language should be developed in a separate provision from the one previously described.

The workgroup noted that currently, there is nothing in existing statute that prohibits an IEP team from planning for and allowing a student with a disability to only be expected to meet minimum state requirements to earn a high school diploma. However, it is the discretion of each LEA to determine if they want to add additional requirements for their students as well as if they will allow some students to be exempted from local requirements. This plays out in variation from one LEA to another, potentially resulting in one LEA requiring their students to meet state minimum requirements for graduation and an LEA next door requiring their students to meet additional requirements (often A–G Requirements). Under current practice, each individual LEA can allow each student’s IEP team the authority to determine what, if any, requirements beyond the state minimum requirements they have to meet to earn a high school diploma. In the interest of equity across the state, California should establish a uniform policy to ensure LEAs have a mechanism to allow for IEP teams to use this option equitably within LEAs and across California.

5.C.ii. Examples of High School Diploma Pathways for Students with Disabilities in Other States

The workgroup reviewed and discussed examples of pathways to a high school diploma for students with disabilities from other states, including Louisiana, Florida, and Washington State. These states had some of the most articulated pathways and options available for comparison.

In 2014, the Louisiana Legislature passed the April Dunn Act, which created alternate pathways for grade promotion and graduation for students with disabilities.²³ Louisiana now defines several pathways for students with disabilities to earn a high school diploma, including: a pathway for students with disabilities who have an IEP that is consistent with the graduation requirements for all students to earn a regular high school diploma, a pathway for students with persistent academic difficulties resulting from a disability (based on eligibility criteria outlined in the April Dunn Act), and a pathway for students with significant cognitive disabilities that results in the state-alternate diploma as described in section 5.D.iii. The diploma document earned by students who complete each of these pathways is identical. The “Louisiana Special Education Guidance for High School Students” provides information about the student population, course of study, graduation requirements, and connection to accountability for each pathway.²⁴

²³ Louisiana Department of Education. *The April Dunn Act: An Alternate Means to Graduation for Students with Disabilities*. https://www.louisianabelieves.com/docs/default-source/academics/april-dunn-act---an-alternate-means-to-graduation-for-students-with-disabilities.pdf?sfvrsn=a4406718_2.

²⁴ Louisiana Department of Education. *Louisiana Special Education Guidance for High School Students*. <https://www.louisianabelieves.com/docs/default->

Florida also offers three standard diploma high school graduation options for students with disabilities, including: an option available to all students, including students with disabilities; an option with academic and employment requirements, available only to students with disabilities; and an option available only to students with significant cognitive disabilities, who take access courses and the alternate assessment as described further in section 5.D.iii.²⁵ The pathway outlined by the second option is aligned to the requirements of the diploma option for all students but allows students with disabilities to substitute relevant CTE courses for some course requirements. The workgroup identified that the Florida framework and the three clear pathways to a diploma for students with disabilities could serve as a model for California. However, the workgroup also noted that California already has the policies in place to support the use of CTE courses as required courses in the state minimum standards for graduation, and a specific policy or pathway that allows only students with disabilities to do this is not needed.

Washington State “has one diploma that meets the federal requirements of a ‘regular high school diploma’ and offers multiple pathways to achievement” and requires districts to have “board-approved policy and procedures for granting a diploma to a student with disabilities that does not deny the student the opportunity to earn a high school diploma solely because of the student’s disability and that provides for meeting ‘the unique

source/academics/special-education-guidance-for-high-school-students.pdf?sfvrsn=61e08d1f_20.

²⁵ Florida Department of Education. 2018. *The Family Guide to Secondary Transition Planning for Students with Disabilities*.

http://project10.info/Documents/FamilyGuide_Revised_FINAL_6.13.18.pdf.

limitations of each student.”²⁶ Washington State guidance indicates that the IEP team is responsible for determining whether an individual student has met state and local requirements to earn a diploma.²⁷

5.D. DEVELOPING AN ALTERNATE DIPLOMA FOR STUDENTS WITH SIGNIFICANT COGNITIVE DISABILITIES

The Alt Pathways Workgroup explored the possibility of California developing an alternate diploma-pathway for students with significant cognitive disabilities, who, in accordance with federal accountability requirements, would qualify if they take the California Alternate Assessments (CAAs). This group currently has the highest number of students receiving a certificate of completion in lieu of a high school diploma (see section 5.E.ii) which in addition to receiving a document of little utility, for both state and federal accountability purposes, certificates of completion are measured as equivalent to a student who has dropped-out and not completed their high school education.

5.D.i. Statutory Authority for an Alternate Diploma-Pathway for Students with Significant Cognitive Disabilities

The 2015 federal Every Student Succeeds Act (ESSA), which reauthorized the Elementary and Secondary Education Act (ESEA), represented a pivotal moment for students with disabilities because it authorized states to create opportunities for every

²⁶ Washington Office of the Superintendent of Public Instruction. *Guidelines for Aligning High School & Beyond Plans (HSBP) and IEP Transition Plans*. <https://www.k12.wa.us/sites/default/files/public/specialed/programreview/monitoring/secondarytransition/Guide-Align-HSBP-IEP-Transition.pdf>.

²⁷ Washington Office of the Superintendent of Public Instruction. *Guidelines for Aligning HSBP and IEP Transition Plans*.

student, regardless of the severity of their disability, to pursue a high school diploma. Specifically, ESSA introduced the concept of a “state-defined alternate diploma” for the purposes of school and LEA accountability.²⁸

ESSA explains that the state-defined alternate diploma is for “students with the most significant cognitive disabilities” who are “assessed using the alternate assessment aligned to alternate academic achievement standards.”²⁹ According to ESSA, the state-defined alternate diploma must be:

- Standards based.
- Aligned with the state requirements for the regular high school diploma; and
- Obtained within the time period for which the state ensures the availability of a free appropriate public education under Section 612(a)(1) of the Individuals with Disabilities Education Act.³⁰

As implied by its name, the state-defined alternate diploma must also be defined at the state level.

States can count students that earn a state-defined alternate diploma in their ACGR, which can benefit states and incentivize creation of alternate diplomas (see section 5.A.ii for information on ACGR).³¹ This also can remove barriers to the wide-range of high school opportunities by removing an existing accountability liability LEAs face in

²⁸ ESSA, 20 U.S.C. § 7801(23)(A), 25(A); 34 C.F.R. 200.34(c)(3).

²⁹ ESSA, 20 U.S.C. § 7801(23)(A), 25(A) ; 34 C.F.R. 300.34.

³⁰ ESSA, 20 U.S.C. § 7801(23)(A), 25(A) ; 34 C.F.R. 300.24.

³¹ Thurlow et al. 2019. “NCEO Report 416: Status of state-defined alternate diplomas in 2018–19.” *National Center on Educational Outcomes*.
<https://files.eric.ed.gov/fulltext/ED600672.pdf>.

serving students with significant cognitive disabilities. As previously described, when a graduate receives a certificate of completion instead of a high school diploma, it is equated to a drop-out in federal accountability. As described in sections 5.D.iii and 5.E.iii, examples from other states illustrate that the state-defined alternate diploma does not need to be called an “alternate diploma” nor does it need to result in a diploma document that is different from the diploma that a preponderance of students receive.

5.D.ii. Alternate Assessments Aligned to Alternate Academic Achievement Standards

As stated in ESSA, the state-defined alternate diploma is specifically for students with the most significant cognitive disabilities who are assessed using a state alternate assessment aligned to alternate academic achievement standards. California already offers alternate assessments aligned to alternate academic achievement standards (AA–AAAS) for students with significant cognitive disabilities.³² These assessments, known as the CAAs, are aligned with the state’s alternate achievement standards, the Core Content Connectors, which are linked to the Common Core State Standards (CCSS).³³ IEP teams are responsible for determining whether a student is eligible to participate in the CAAs.³⁴ These assessments are only intended for a small number of students in California; per ESSA requirements, California must ensure that the total

³² Education Code 60640(k).

³³ Title 5, California Code of Regulations, Section 850(g); California Department of Education. Alternate Assessments for ELA and Math. <https://www.cde.ca.gov/ta/tg/ca/altassessment.asp>.

³⁴ 20 U.S.C. 1412(a)(16)(C); 1414(d)(1)(A)(i)(VI). The California Department of Education provides a Decision Confirmation Worksheet to support this process. <https://www.cde.ca.gov/ta/tg/ca/documents/altassessmentdecision.pdf>.

number of students assessed for each subject using the CAAs “does not exceed 1 percent of the total number of all students in the State who are assessed in such subject.”³⁵

As part of the criteria for participating in the CAAs, IEP Teams must determine whether a student has a significant cognitive disability. California regulations define the term as follows:

(v) “Pupils with the most significant cognitive disabilities” means pupils with a disability or disabilities as defined under Title 20 United Code section 1401(3) that significantly impact(s) cognitive functioning and adaptive behavior and who require extensive, direct individualized instruction and substantial supports to achieve measurement on academic standards, provides that:

(1) The identification of a pupil as having a particular disability as defined in IDEA shall not determine whether or not a pupil is a pupil with the most significant cognitive disabilities; and

(2) A pupil with the most significant cognitive disabilities must not be identified as such based solely on the pupil’s previous low academic achievement or the pupil’s previous need for accommodations to participate in general statewide or local assessments.

(3) For purposes of this definition, “adaptive behavior” means behavior essential for someone to live independently and to function safely across three domains of daily life skills: conceptual (e.g., activities of daily living, occupational skills, safety, healthcare, and travel).³⁶

The CDE provides the following description of significant cognitive disability as one of three criteria for determining CAA participation:

The student has a significant cognitive disability. Review of the student’s school records indicates a disability or multiple disabilities that significantly impact intellectual functioning and adaptive behavior essential for a person to live independently and to function safely in daily life. Having a significant cognitive disability is not determined by an IQ test

³⁵ ESSA, 20 U.S.C. § 6311(b)(2)(D).

³⁶ Title 5, California Code of Regulations, Section 850(v).

score; rather, a holistic understanding of the student is required. Students identified with a specific learning disability cannot also be identified as cognitively impaired, as the determination of a specific learning disability rules out cognitive impairment. IEP teams should be careful to consider the following:

- Conceptual skills—language and literacy; money, time, and number concepts; and self-direction
- Social skills—interpersonal skills, social responsibility, self-esteem, gullibility, naïveté (i.e., wariness), social problem solving, and the ability to follow rules/obey laws and to avoid being victimized
- Practical skills—activities of daily living (personal care), occupational skills, health care, travel/transportation, schedules/routines, safety, use of money, use of the telephone

As part of the IEP team decision, the team also should consider the following:

- Community environment typical of the student’s peers and culture
- Linguistic diversity
- Cultural differences in the way people communicate, move, and behave

IEP teams must also consider the following criteria when determining whether a student is eligible for the CAAs:

- “The student is learning content derived from the CA CCSS or the CA NGSS [Next Generation Science Standards] or is acquiring proficiency as identified in the 2012 English Language Development Standards.
- The student needs extensive, direct individualized instruction and substantial supports to achieve measurable gains in the grade-level and age-appropriate curriculum.”³⁷

³⁷ California Department of Education. *Alternate Assessment IEP Team Guidance*. Additional details about the criteria for participation in the CAAs are available on the CDE website: <https://www.cde.ca.gov/ta/tg/ca/caaiepteamrev.asp>.

A student must meet all three criteria to participate in the CAAs; therefore, a potential state-defined alternate diploma for students with significant cognitive disabilities in California would only be available for students who meet these criteria. The workgroup felt this was an easily defined group of students noting this requirement and these established criteria would limit opportunities to “game the system.”

5.D.iii. Examples of Alternate Diplomas in Other States

In 2016, a U.S. Department of Education review of state diploma options found that no states had a diploma that met the requirements of a state-defined alternate assessment outlined in ESSA.³⁸ Since then, several states have developed or are in the process of developing alternate diplomas for students with significant cognitive disabilities. The workgroup reviewed information on alternate diplomas in other states to help shape recommendations related to an alternate diploma-pathway in California.

A study published by the National Center on Educational Outcomes (NCEO) in 2019 found that as of the 2018–19 school year, eight states offered a state-defined alternate diploma for students with significant cognitive disabilities or were in the process of developing one, including Arkansas, Louisiana, Mississippi, Nevada, New Hampshire, Tennessee, Utah, and West Virginia.³⁹ As described further in section 5.E.iii, states use a variety of names to refer to the state-defined alternate diploma allowed by ESSA. NCEO found that the eligibility requirements for participation in the alternate diploma varied across states: six states required participation in the AA–AAAS, four states additionally required completion of required academic credits, one state required

³⁸ Thurlow et al. 2019. “NCEO Report 416”.

³⁹ Thurlow et al. 2019. “NCEO Report 416”.

progress on IEPs, and one state required demonstration of appropriate attendance and conduct.⁴⁰ Most states with alternate diplomas aligned the total credit requirements of the alternate diploma with those required for the standard diploma and aligned the content area credit requirements for the alternate diploma to those of the standard diploma.⁴¹

According to NCEO, all eight states provided resources explaining the requirements of the alternate diploma on their state websites for administrators, teachers, parents, and students, while only three states provided resources to assist teachers to implement the diploma. Based on this, NCEO offered the following recommendations:

It is recommended that states intending to develop a state-defined alternate diploma consider ways to assist in the decision about whether parents and their children should pursue this diploma. Further, states should make information available on both the number of students with the most significant cognitive disabilities pursuing and earning a state-defined alternate diploma, and eventually, the post-school outcomes of these students.⁴²

Some additional states have added alternate diplomas since the publication of the NCEO report, including Florida and Georgia. The Alt Pathways Workgroup reviewed information about alternate diplomas in these states and more detailed information about the alternate diploma offered in Louisiana. In particular, the workgroup examined the course requirements of these states to help inform recommendations about course requirements for California's alternate diploma. Florida offers a "24-Credit Standard

⁴⁰ Thurlow et al. 2019. "NCEO Report 416".

⁴¹ Thurlow, M., Rogers, C., and Lazarus, S. "What Alternate Assessments and Diplomas Really Mean for Students with Significant Disabilities." PowerPoint presentation. NCEO. <https://nceo.umn.edu/docs/Presentations/CEC2020ThurlowLazarusRogers.pdf>.

⁴² Thurlow et al. "NCEO Report 416".

Diploma” option for students with significant cognitive disabilities, who take access courses and the alternate assessment.⁴³ In Florida, students must earn credits for all courses required by the standard diploma option available to all students; however, they may substitute access courses for general education courses, may substitute CTE courses for some select course requirements, and may include employment-based courses as part of their elective credits.⁴⁴ Georgia *EC* outlines two diploma pathways for students with significant cognitive disabilities, including one that results in a regular high school diploma and one that results in an alternate diploma.⁴⁵ Amongst other criteria for earning the alternate diploma, students must complete an integrated curriculum that is based on the Georgia state standards and also includes coursework in career preparation, self-determination, independent living, and personal care.⁴⁶ Louisiana offers a high school diploma for students with significant cognitive disabilities that meet the state’s alternate assessment eligibility criteria and participate in the alternate assessment.⁴⁷ Louisiana allows students that complete this pathway to earn credits from general education courses or applied courses.⁴⁸

⁴³ Florida Department of Education. 2018. *The Family Guide to Secondary Transition Planning for Students with Disabilities*.

http://project10.info/Documents/FamilyGuide_Revised_FINAL_6.13.18.pdf.

⁴⁴ Florida Department of Education. 2018. *The Family Guide to Secondary Transition Planning for Students with Disabilities*.

⁴⁵ Georgia *Education Code*: IHF(6) 160-4-2-.48.

⁴⁶ Georgia *Education Code*: IHF(6) 160-4-2-.48.

⁴⁷ Louisiana Department of Education. 2020. *Louisiana Special Education Guidance for High School Students*. https://www.louisianabelieves.com/docs/default-source/academics/special-education-guidance-for-high-school-students.pdf?sfvrsn=61e08d1f_20.

⁴⁸ Louisiana Department of Education. 2020. *Louisiana Special Education Guidance for High School Students*.

Given that the state-defined alternate diplomas have only been put into practice in recent years, limited information is available about the impact of these diploma pathways on outcomes for students with significant cognitive disabilities. However, each state reviewed above has seen increases in their overall graduation rates of students with disabilities as a result of ensuring that there is a diploma option for all students.

5.E. DISCUSSIONS SURFACED ABOUT OTHER RELATED MATTERS

The workgroup noted across many of its discussions the multiple facets and complexity within the topics of high school preparation, graduation requirements and diploma-pathways. There was a great deal of connective tissue between discussions about diploma-pathways for students with disabilities and the realities the education system faces in preparing all students with and without disabilities for future opportunities and success. Inclusion in the general education classroom alongside peers without disabilities and receiving high-quality instruction and access to grade-level appropriate curriculum was at the heart of most discussions as it relates to mapping from the earliest grades to high expectations, a high school diploma, leading to employment. The workgroup discussed several other matters that relate to the charge of the workgroup, including the role of the IDEA's guarantee of FAPE related to diploma attainment, the California certificate of completion and what should happen with it, the role and requirements of student transcripts, and how to think about adult transition services and life skills within the context of diploma attainment. Additional background and information related to these matters is discussed below.

5.E.i. Free Appropriate Public Education (FAPE) in the Least Restrictive Environment

The IDEA ensures that “A free appropriate public education in the least restrictive environment” must be available to all children residing in the state between the ages of three and twenty-one.”⁴⁹ As a result, students with disabilities are able to take the additional time allowed by FAPE to complete all requirements for a regular high school diploma. However, the IDEA does not obligate states to provide a FAPE once a child with disabilities has graduated from high school with a regular high school diploma.⁵⁰ As amended in 2017, adopting the definition of a regular high school diploma in the 2015 ESSA amendments, IDEA regulations state:

The standard high school diploma awarded to the preponderance of students in the state that is fully aligned with state standards, or a higher diploma, except that a regular high school diploma shall not be aligned to the alternate academic achievement standards described in Section 1111(b)(1)(E) of the ESEA. A regular high school diploma does not include a recognized equivalent of a diploma, such as a general equivalency diploma, certificate of completion, certificate of attendance, or similar lesser credential.⁵¹

This has significant implications for potential recommendations related to the workgroup’s legislative charge. Based on the IDEA definition, a student who receives a diploma through the state-defined alternate diploma-pathway for students with significant cognitive disabilities would be eligible to continue receiving FAPE through

⁴⁹ IDEA, 34 CFR § 300.101.(a). In California, this extends to age 22. Education Code 56026(c)(4)(A-C).

⁵⁰ IDEA, 34 CFR § 300.102.(a)(3)(i).

⁵¹ IDEA, 34 CFR § 300.102.(a)(3)(iv); see also ESSA, 20 U.S.C. 7801(43), and 34 C.F.R. 200.34(c)(2); Education Code 56026.1(a).

age twenty-one, while a student who has earned a regular high school diploma based on completion of any other pathway would no longer be guaranteed FAPE. Additionally, with the most recent provisions described in the ESSA (see section 5.D.i), which work in tandem with the IDEA, students with significant cognitive disabilities can earn a high school diploma that is counted positively for accountability as a graduation. While at the same time, this group of students can still maintain their status under the IDEA as not having received a regular diploma and maintain eligibility for receiving FAPE through age twenty-one.

5.E.ii. The Certificate of Completion

Across the country, the practice of awarding certificates of completion originated because graduation frameworks did not have equitable opportunities for students with disabilities to pursue high school diplomas. Although Education Code 56391 provides that students who receive a certificate of completion are entitled to participate in the graduation ceremony, LEAs have at times been hesitant to allow students with disabilities the opportunity to do so without having a diploma-like document. In California, *EC* Section 56390 allows LEAs to award certificates of completion to students with disabilities who are not on a regular high school diploma track, or do not meet the requirements of a regular high school diploma, if they: complete a prescribed alternative course of study approved by their local school board; meet their IEP goals and objectives during high school as determined by the IEP team; and attend high school, participate in instruction as prescribed by their IEP, and meet the objectives of the statement of transition services.

However, certificates of completion neither benefit states nor the students they serve. Certificates of completion are not recognized as either a regular high school diploma or state-defined alternate diploma by federal law and cannot be included in state ACGR calculations (see section 5.A.ii for information on ACGR).⁵² Certificates are also not accepted as a diploma equivalent for most postsecondary opportunities including employment, military service, or traditional four-year college pathways. As a result of having the certificate as a statutory option, many students with disabilities are presumed to be on a “non-diploma” or certificate path at a very young age and do not get access to the general education environment or appropriate grade-level coursework to even attempt to earn a high school diploma.

Table 2 compares the key characteristics of a high school diploma and a certificate of completion.

Table 2: Characteristics of the High School Diploma vs. Certificate of Completion

Characteristics	High School Diploma	Certificate of Completion
Does the document signify that the student has completed a specific course of study?	Yes	No
Does the document allow access to basic postsecondary education or employment?	Yes	No
Is the document recognized in accountability systems?	Yes	No

⁵² ESSA, 20 U.S.C. § 7801(43); 34 C.F.R. 200.34(c)(2).

“Certificate of completion” is also used as a special education exit code in data collected in California, which allows LEAs to show that students attended high school but did not meet all the requirements to earn a high school diploma. Of the 81,094 students with disabilities of all grades who exited special education services in California in the 2019–20 school year, almost one in 10 (8 percent) received a certificate of achievement or completion.⁵³ Significantly higher percentages of students in some disability categories received a certificate that year, including students with Intellectual Disabilities (59 percent), Orthopedic Impairment (59 percent), Deafness (50 percent), Emotional Disturbance (35 percent), Deaf Blindness (26 percent), Specific Learning Disability (19 percent), Multiple Disabilities (15 percent), and Visual Impairment (15 percent).⁵⁴ This data further evidences the importance of exploring alternate diploma-pathways for students with disabilities in order to provide greater opportunities for students to exit high school prepared for postsecondary education or employment and with the opportunity to earn a family sustaining wage and meaningfully participate in their communities.

5.E.iii. Words Matter: High School Diploma Naming Conventions

The workgroup participated in several discussions about the appropriate name for a “state-defined alternate diploma” for students with significant cognitive disabilities. As described in section 5.D.i, ESSA defines a regular high school diploma and an alternate diploma for the purposes of accountability; however, ESSA does not provide guidance

⁵³ California Department of Education. “Students with Disabilities in California & Graduation.” Presentation by Shiyloh Duncan-Becerril, Associate Director Special Education Division, California Department of Education. January 2021.

⁵⁴ California Department of Education. “Students with Disabilities in California & Graduation.”

on what the alternate diploma must be called. Members of the workgroup felt that it was important that the actual diploma document that resulted from completion of the state-defined alternate diploma-pathway did not differ from the regular diploma, because a diploma that was labeled or described as an “alternate diploma” would result in the continued exclusion of students with disabilities from postsecondary opportunities, including employment. The workgroup learned that other states use a variety of names for diploma-pathways that meet the ESSA requirements of the state-defined alternate diploma, including “Alternate Diploma,” “Alternate Pathway to Graduation,” “Alternate Pathway to a Diploma (for students with disabilities),” and “Alternate Academic Diploma.”⁵⁵

5.E.iv. The Role of Student Transcripts

As part of the Alt Pathways Workgroup’s discussions about diploma naming conventions, workgroup members discussed the role of multiple documents that recognize student achievement. When any student graduates from high school, there are typically two documents that recognize their achievements: the high school diploma and the high school transcript. The high school diploma is the commemorative document a student receives as part of the graduation ceremony that signifies that the student has completed high school, met requirements for graduation, and is ready to move on from the local school system. It is typically branded by a high school or LEA and contains general information such as the student’s name, school, LEA, and date the student graduated from high school. The high school transcript, on the other hand,

⁵⁵ Thurlow et al. 2019. “NCEO Report 416: Status of state-defined alternate diplomas in 2018–19.” *National Center on Educational Outcomes*. <https://files.eric.ed.gov/fulltext/ED600672.pdf>.

outlines all courses a student took during their high school experience (including notation of any advanced placement or honors courses). Also included on the transcript are the grades earned in each course (either letter grade or pass/fail), and the general overall achievement (grade point average) throughout high school. Neither of these documents communicate to postsecondary institutions or employers any additional information such as disability status or socioeconomic status.

Table 3 below compares the key characteristics of a high school diploma document and a high school transcript. This is an important clarification in refuting concerns that employers, higher education, or others might expect the same level of academic achievement or knowledge held by students with and without disabilities who receive a diploma. In reality, it is the transcript which clarifies the courses taken and achievement attained. Additionally, there have been concerns expressed that offering a regular diploma to all students, regardless of their level of disability, will undermine the high school diploma and make it less meaningful. The workgroup believes it is a right of all students to have a pathway to earning a high school diploma and the federal IDEA and ESSA support this notion. For students with and without disabilities, a high school diploma does not detail whether proficiency or mastery has been met across all subjects, instead, transcripts fulfill that purpose.

Table 3: High School Diploma vs. High School Transcript

Characteristics	High School Diploma	High School Transcript
Does the document signify that the student has completed a specific course of study?	Yes	Yes
Does the document outline the specific course work a student completed?	No	Yes
Does the document outline the grades or achievement levels a student earned?	No	Yes
Does the document indicate that the student has a disability or any exceptional learning needs?	No	No

5.E.v. Adult Transition Services and High School Graduation

The IDEA mandates the provision of transition services for students with disabilities to “improve the academic and functional achievement of the child with a disability to facilitate the child’s movement from school to post-school activities.”⁵⁶ Over time, this mandate has resulted in an often separate set of offerings, often referred to as a “transition program,” that LEAs provide for students typically between 18–22 years old, who did not earn a high school diploma and are still eligible for a FAPE. These

⁵⁶ IDEA, 34 CFR § 300.43.

programs are often offered in different settings than a high school, sometimes out in the community or in a separate building on a school site. The bibliography includes links to transition related resources.

The workgroup discussed how these services were never intended to prevent a student from earning a diploma at four years, or any time up until they turn twenty-two years old. However, over time, these services have taken on a life of their own, often referred to as “transition programs” in which students with disabilities, who are typically those students with more extensive needs and who on the certificate track, stay in K–12 until age twenty-two as a matter of practice and default, not always for a specific reason. There is nothing in federal law that mandates any student with a disability stay in the K–12 education system until age 22 nor does it describe transition services as an 18–22 years of age program. California’s CIE Blueprint collaboration is one example of an already existing structure comprised of a cross state-agency team (CDE, DOR, DDS), described in section 2, who are poised to work specifically on this body of work that was not a direct charge of this workgroup, to more deeply define what transition services should look like and the role each agency should play in supporting students pre- and post-graduation. Before any statewide changes are suggested on whether to either require or allow additional transition-related courses for students who stay in the K–12 system until age 22 through the alternate diploma-pathway, the state needs to do further study on what its expectations of transition programming are and how the multiple agencies required to support students in this age-range will coordinate with one-another.

5.F. IDENTIFIED BARRIERS TO A DIPLOMA

The workgroup identified and discussed current structures, practices, and mindsets that might help explain California’s low graduation rates for students with disabilities. These include culture, beliefs, policies, and structural barriers that will be further described in this section.

5.F.i. Current Graduation Culture and Emphasis

As evidenced by state and federal reporting and accountability systems from across the country, and in California, current established graduation culture values a standardized four-year graduation model. This is also reinforced by ceremonial structures that matriculate students from freshman to senior year in four years and label each four-year class “the class of 20XX.” At the end of senior year, participation in the graduation ceremony and walk across the stage memorializes and celebrates that four-year accomplishment for students receiving their high school diploma. While reporting and accountability systems adjust for students who earn a regular high school diploma after four years, embedded challenges for students with disabilities remain. These challenges, described below, are a result of discrepancies between protections for students with disabilities embedded in federal and state law, and what is incentivized in accountability systems.

While most students with disabilities graduate and exit the LEA with their four-year cohort, some students with disabilities need additional time in the LEA—this can include both extra time to meet the requirements for the high school diploma or additional time to work on transition goals. Under the IDEA and California law, LEAs must provide FAPE to students with disabilities until the student turns twenty-two or earns a regular

high school diploma that terminates the provision of FAPE, as described in section 5.E.i. When appropriate, students with disabilities use this extended time in high school to meet academic requirements and develop independent living skills, including vocational skills, to be successful after high school. This creates a tension between the time needed to adequately prepare students and graduation traditions. As a result, many students with disabilities in California are put on a path of earning a certificate of completion marking four years of attending high school and allowing them to participate in the graduation ceremony across the state with their four-year class cohort. Then they may return the next year to sometimes continue their high course of study or typically attend a transition program with the LEA until they reach the maximum age of twenty-two.

This tension is further compounded because adult transition programs are often administered as separate from high school (see section 5.E.v). These programs are run by LEAs and are typically designed to serve students with more significant disabilities who did not meet all the requirements to earn a high school diploma and need to continue to access FAPE from the LEA. Most people view adult transition programs as different or separate from high school, because these programs often focus on vocational and life skills and are usually administered in a different location or building than traditional high school programs. In California, workgroup members report that it is common practice to move students with disabilities from traditional high school buildings after four years to an adult transition program at a different location administered by the LEA, instead of building a cohesive high school experience that prepares students to exit the LEA with a diploma within the appropriate time it takes the individual student to

gain the knowledge and skills needed to be successful after high school as allowed under the IDEA.

5.F.ii. “A–G for All” Emphasis

In the interest of equity and to ensure all students have access to the preparation and courses required for acceptance to a four-year university directly out of high school, many LEAs in California have opted to require all students to complete the A–G courses to graduate with a regular high school diploma in addition to the state minimum requirements, as described in section 5.B.i and 5.C.i. However, sometimes these course sequences present challenges for some students with disabilities. This is in part due to the course complexities, learning speed, and rigor required to succeed in many A–G courses. For students who have not had access to grade-level coursework in prior years or who have learning disabilities resulting in slower acquisition of skills, it proves difficult and frustrating to master some of the complex content at the same rate as their non-disabled peers. Further, A–G for all requirements (with no exceptions) make it challenging for an IEP team to customize a course taking progression that could meet state minimum standards for graduation and can result in a student who does not complete A–G coursework not receiving a high school diploma. Finally, there are many students with disabilities who received all or significant parts of their education in separate “special day” classes and have not received access to the level of academic skills and courses necessary to find success in A–G courses, and who still may want to attend college but would benefit from first attending community college before moving on to a four-year university.

5.F.iii. Separate Classrooms for Educating Students with Disabilities

Research has shown that students with disabilities who are educated in the general education classroom have higher achievement and improved outcomes than students who are served in separate or segregated settings.⁵⁷ This is attributed to greater access to grade-level learning standards alongside peers without disabilities, strong instruction, modeling from peers, and generally higher expectations. However, according to the most recent published data for federal reporting of rates of inclusion also known as Least Restrictive Environment, only 58.37 percent of California students with disabilities spend 80 percent or more of their time in the general education environment, and 18.2 percent of students with disabilities spend less than 40 percent of their time in general education.

In practice and supported by the data previously mentioned, many students with disabilities are removed from or never gain access to the general education classroom where they could receive special education and related services that are in support of mastering grade-level standards in real-time, general education classroom instruction. As a result of this lack of access to the core curriculum, students often fail to ever attain mastery of grade-level content, leading to a lower likelihood of attaining a diploma and a greater likelihood of not earning a high school diploma or being placed on a certificate of completion track, sometimes a decision that is made at a very young age.

⁵⁷ Abt Associates. August 2016. *A Summary of the Evidence on Inclusive Education*. http://alana.org.br/wp-content/uploads/2016/12/A_Summary_of_the_evidence_on_inclusive_education.pdf.

5.F.iv. Availability of Career Technical Education (CTE)

CTE provides rich opportunities for students with and without disabilities to graduate from high school with a set of skills that prepares them to go straight into the workforce. It also allows students to meet many of the general requirements for graduation through more hands-on real-world learning. However, workgroup members expressed concern that these opportunities are not always equally available geographically across the state, particularly in small rural counties. In some instances, these opportunities have reportedly not been accessible to students with disabilities, particularly students with more significant support needs. Offering accessible CTE opportunities to the full continuum of learners would open additional opportunities for students with disabilities to obtain the credits and skills they need to earn a high school diploma. The workgroup believes that CTE is an area that could greatly benefit from further exploration to determine additional potential recommendations. The workgroup also expressed the need to have additional contributors to further the conversation, including the business community, workforce development, CTE pathway experts, school counselors, and others.

6. EQUITY AS A DRIVER FOR CHANGE

Through recent, intentional, and focused educational reform, California has signaled a deep commitment to honoring the vast diversities of the students it serves. This includes intentional design and increased financial and technical support for serving diverse students in more inclusive and accessible learning environments, designed to meet the unique educational needs of each and every learner.

Significant time, energy, dollars, training, and brain trust have been directed over the past decade to identify and address the deep inequities experienced by marginalized student groups with a more recent focus on California's students with disabilities.

Throughout the discussions held by the Alt Pathways Workgroup, the issue of equity served as a guidepost as the workgroup grappled with recommending improvements to the current system. Overwhelmingly, the workgroup agreed that to provide equality of opportunity for every student in the state, the state has a responsibility to provide viable, accessible pathways to a high school diploma that are meaningful and of utility for future employment and participation in our democracy.

7. WORKGROUP RECOMMENDATIONS

The Alt Pathways Workgroup developed seven core recommendations in response to its charge. Implementation of these recommendations will result in a new high school graduation framework that includes a total of three diploma-pathways for students with disabilities in California.

7.A. PROPOSED DIPLOMA-PATHWAYS FRAMEWORK

Implementation of the workgroup's seven key recommendations proposed in this section of the report will result in three articulated and accessible diploma-pathways for students with disabilities, all culminating in a student earning a high school diploma. Collectively, the development of one new pathway option for students with significant cognitive disabilities, and expanded guidance, clarification, and training in the use of the two existing diploma-pathways, will offer greater customization, individualization, and flexibility for students with IEPs to earn diplomas. The workgroup agreed creating viable

pathways for all students with disabilities to earn a diploma will also raise expectations and increase inclusive opportunities for students with significant cognitive disabilities, who are currently earning a certificate of completion and do not have a pathway to earning a diploma. The workgroup does not support the creation of an “Alternate Diploma” that is separate and distinct from any other diploma document and cautioned that such a diploma would be a disservice to students and would not provide any more utility than the existing certificate of completion. The workgroup recommends the statutory allowance, utilization, and support for the following three pathways:

1. **A new state-defined alternate diploma-pathway for students with the most significant cognitive disabilities that take the California Alternate**

Assessments: A very small group of students (generally less than 1 percent of all students) are identified as having significant cognitive disabilities and are eligible to participate in the CAAs (see section 5.A.i student group 1 and section 5.D). Only students who are eligible for the CAAs based on existing participation criteria have the option to pursue the state defined alternate diploma-pathway, as per federal law.⁵⁸ As required by federal law, this alternate diploma-pathway must be standards-based, aligned with the state requirements for the regular high school diploma, and obtained within the time period for which the state ensures the availability of FAPE under Section 612(a)(1) of the IDEA.⁵⁹ The workgroup intentionally describes this pathway as an “alternate diploma-pathway” for

⁵⁸California Department of Education. *Alternate Assessment IEP Team Guidance*. CAA participation criteria are defined by the California Department of Education. See <https://www.cde.ca.gov/ta/tg/ca/caaiepteamrev.asp>.

⁵⁹ See section 5.C for additional information about federal law pertaining to state-defined alternate diplomas.

students with significant cognitive disabilities rather than an “alternate diploma”. The workgroup felt strongly that the actual diploma document that students earn through this pathway should be the same as the regular high school diploma document. They caution that the term “alternate diploma” alludes to something different from a regular diploma and would likely be considered of lesser value than a regular diploma as it would not allow access to many postsecondary educational opportunities, employment, or the military.

2. **A pathway to earning a high school diploma based solely on state minimum requirements for graduation:** Some students with disabilities (see section 5.A.i student group 2), who receive special education and related services, have IEPs that require significant or specialized instructional support and the use of more than minimal accommodations to meet grade-level academic expectations. The workgroup believes some students in this generalized group would benefit from having additional time and support in the required courses necessary to meet the state requirements for graduation. For example, for the state required completion of Algebra, a student might benefit from dividing the content of one semester of Algebra into multiple semesters and receiving significant accommodations based on a student’s specific learning needs. The workgroup felt the need for this additional significant scaffolding for some students may make it difficult to complete local requirements in addition to state requirements, such as A–G requirements, currently required by more than 50 percent of California LEAs in California. To ensure this pathway is not used inappropriately, the workgroup proposes extensive guidance, training, and

assurances to support IEP teams to determine the appropriate pathway for each student with a disability, while maintaining high expectations and college and career opportunities. The workgroup also recommends the state ensure appropriate data collection, analyses, and monitoring to help state and local decision makers stay abreast of how LEAs are utilizing each diploma-pathway and ensure pathways 1 and 2 are not being overused.

3. **The traditional pathway to earning a high-school diploma based on meeting all state and local requirements:** This is the existing diploma pathway available to all students in California based on LEA defined graduation requirements that build upon the state minimum requirements for graduation (see section 5.B). Most students with disabilities (see section 5.A student group 3), who receive special education and related services should be able to meet LEA graduation requirements to receive a high school diploma via this traditional pathway, with the appropriate supports and services. This pathway would not require any statutory changes, but the field would greatly benefit from additional guidance and training to ensure all students have access to high-quality, grade-level instruction allowing them to master grade-level standards from the earliest grades through high-school.

7.B. WORKGROUP RECOMMENDATIONS, ACTIONS, AND CONSIDERATIONS

The State Budget Act charged the workgroup with providing recommendations in the following areas:⁶⁰

- **Statutory Charge 1:** Studying existing and developing new alternate pathways for students with disabilities to access the core curriculum to satisfy the requirements for a high school diploma.
- **Statutory Charge 2:** Developing an alternate diploma aligned to the state's alternate achievement standards for students with significant cognitive disabilities, consistent with federal law.
- **Statutory Charge 3:** Other related matters necessary to meet the purpose set forth in this provision.

Each of the following recommendations include a reference to specific and relevant statutory charge(s) of the workgroup, the recommendation text, proposed actions for implementing the recommendation, and considerations for adoption and implementation.

Recommendation 1: Create a High School Diploma-Pathway for Students with Significant Cognitive Disabilities

Statutory Charge: 2

⁶⁰ See Section 3 for a detailed description of the Workgroup's charge.

Recommendation

California should develop an alternate diploma-pathway for students with significant cognitive disabilities who take the CAAs, as defined by and allowable within federal parameters for offering what ESSA refers to as an “alternate diploma”.⁶¹ The diploma document earned with this pathway should be the same as that of the regular high school diploma pathway, however, the requirements for earning this diploma would be based on completing grade-level alternate achievement standards through modified coursework for this defined very small population of students.⁶² The specific course of study completed by a student to earn a diploma through this pathway should be reflected in a student’s transcript and mirror state graduation course requirements for all students. To meet the criteria for accountability outlined in federal law, this alternate diploma-pathway must be standards based, aligned with the state requirements for the regular high school diploma, and obtained within the time period for which the state ensures the availability of a free appropriate public education under Section 612(a)(1) of the IDEA.⁶³

The alternate diploma-pathway for students with significant cognitive disabilities should be made available to all eligible students as soon as possible and piloted by selected LEAs who are poised to implement immediately.

⁶¹ See section 5.D.i. for information about the ESSA definition of a state-defined alternate diploma.

⁶² See section 5.D.ii for information about the alternate achievement standards and the state’s criteria for “significant cognitive disabilities”.

⁶³ See section 5.C for additional information about federal law pertaining to state-defined alternate diplomas.

Proposed Actions

A. The California State Legislature will need to amend *EC* Section 51225 to allow students with significant cognitive disabilities who take the CAAs to meet the state minimum requirements for graduation using California’s alternate achievement standards⁶⁴ and codify this diploma-pathway as a legitimate avenue to earn a diploma. The California course requirements for earning the state-defined alternate diploma-pathway must, at minimum, be aligned to the state minimum requirements for graduation that all students must achieve to earn a high school diploma. Further study, policy discussion, and development will be necessary to determine whether the state-defined alternate diploma-pathway should include additional state requirements beyond those aligned to the state minimum requirements, or whether this might be left as a local decision. The workgroup felt that at this time, no additional requirements should be mandated. The alignment chart below proposes state minimum requirements for the alternate diploma-pathway for students with significant cognitive disabilities and compares these requirements to the current state minimum requirements for a high-school diploma.

⁶⁴ See section 5.B.i for information about *Education Code* Section 51225, and section 5.D.ii for information about the CAAs and Alternate Achievement Standards.

Table 4: Alignment Chart of Current and Proposed State Minimum Requirements for Regular Diploma and for the Alternate Diploma-Pathway for Students with Significant Cognitive Disabilities

Subject	Summary of Current State Minimum Requirements for Regular Diploma⁶⁵	Proposed State Minimum Requirements for Alternate Diploma-Pathway for Students with Significant Cognitive Disabilities
English	Three years	Three years <i>Using the CA Alternate Achievement Standards</i>
Math	Two years <i>Must include Algebra</i>	Two years <i>Using the CA Alternate Achievement Standards</i> <i>Does not require Algebra</i>

⁶⁵ See section 5.B.i for additional details about the current state minimum requirements.

Subject	Summary of Current State Minimum Requirements for Regular Diploma ⁶⁵	Proposed State Minimum Requirements for Alternate Diploma-Pathway for Students with Significant Cognitive Disabilities
Social Sciences	<p>Three years</p> <p><i>Must include US history and geography, world history, culture, and geography; one semester of American government; and one semester of economics</i></p>	<p>Three years</p> <p><i>Does not require specific courses</i></p>
Science	<p>Two years</p> <p><i>Must include biology and physical science</i></p>	<p>Two years</p> <p><i>Using the CA Alternate Achievement Standards</i></p> <p><i>Does not require biology or physical science</i></p>
Physical Education	<p>Two years</p>	<p>Two years</p>

Subject	Summary of Current State Minimum Requirements for Regular Diploma⁶⁵	Proposed State Minimum Requirements for Alternate Diploma-Pathway for Students with Significant Cognitive Disabilities
Foreign Language or Visual and Performing Arts or CTE	One year	One year

- B. The SBE will need to work with the United States Department of Education (USDOE) to ensure that the high school diploma earned through the alternate diploma-pathway meets requirements under ESSA and is appropriately included in California’s accountability system. This may require a formal written request by CDE or SBE to USDOE.
- C. The state will need to assess and plan for any necessary adjustments to the California’s Accountability System, State Dashboard, and subsequent adjustments to regulations, data collection and reporting, existing guidance, instructions, and forms related to accountability.

- D. The state will need to create and disseminate guidance for LEAs about how to document that a student has completed a course requirement using the alternate achievement standards for student transcripts and data reporting.⁶⁶
- E. The CDE will need to create and provide informational resources and training to assist LEAs, educators, and other education stakeholders in implementing any new opportunities or requirements related to a new alternate diploma-pathway (see also recommendation 5).
- F. The state will need to develop and provide LEAs with guidance, training, and technical assistance on how to appropriately code and report data pertaining to students that complete the alternate diploma-pathway in ACGR, as allowed by ESSA.⁶⁷

Considerations for Adoption and Implementation

Stakeholder support for access to a high school diploma for all students: The workgroup disseminated a public survey to collect stakeholder input on key questions related to the workgroup’s charge. Of the 939 survey respondents that responded to the question, “In your opinion, should California have a high school diploma option available for every student regardless of the severity of their disability?”, the majority (85.85 percent) responded, “yes”, while only 14.16 percent responded, “no”, demonstrating strong support for access to a high school diploma for all students.

Timeline considerations: The workgroup felt it was imperative to begin implementing the new pathway to a diploma for students with significant cognitive disabilities at the

⁶⁶ See section 5.E.iv for information about the role of student transcripts.

⁶⁷ See section 5.A.ii for information about ACGR.

earliest possible date. Members of the workgroup suggested that the state should offer this diploma by the 2023–24 school year, or as soon thereafter as possible, and allow LEAs to pilot the new diploma-pathway if they are poised to offer it on a sooner timeline than the state as a whole.

Life skills as additional course requirements: Members of the workgroup and survey respondents both indicated that students with significant cognitive disabilities would greatly benefit from additional courses focused on preparation for life after high school, such as career and life skills. However, the workgroup determined that further study was necessary before making a recommendation to include these in the state requirements for the alternate diploma-pathway, as there was concern about adding state-defined course requirements for students with significant cognitive disabilities that exceed the state minimum course requirements for all students. Another potential approach offered to ensure students have access to life skill preparation, is to include a more robust section within transition planning in the IEP process (and state IEP template, if adopted) that would help IEP teams explore individual student needs related to skill attainment beyond academics, that may be necessary to gain employment and live independently.

The significance of a diploma: Workgroup members acknowledged that some stakeholders may believe that creating an alternate diploma-pathway leading to a high school diploma will “water down” the significance of a high school diploma or somehow “lower the bar” for all students. However, the workgroup disagreed with this assertion because students who earn a high school diploma using the alternate diploma-pathway

will still be required to meet state requirements for graduation and ultimately have just as much of a right to earn a diploma as students without disabilities.

Access to transition services: Workgroup members expressed concern that providing opportunities for students with significant cognitive disabilities to receive a diploma will result in fewer students receiving transition services before exiting the K–12 system. This is because historically and according to the IDEA, a FAPE terminates once a student receives a regular high school diploma. However, the workgroup came to understand how under ESSA provisions (see Section 5.E.i.) for this specific diploma pathway, allows FAPE to remain until a student chooses to exit the system or turns twenty-two years old. The opportunity to take full advantage of the additional years does not preclude an IEP team from making an individualized decision to graduate and exit a student sooner. It will be important for IEP teams to do individualized graduation planning so every student can pursue the most appropriate graduation pathway, on an appropriate timeline, and receive the services they need to receive a FAPE, as stated in recommendation 2.

Communication and buy in from employers: Workgroup members acknowledged some stakeholders may be concerned that creating an alternate diploma-pathway to earning a high school diploma for students with significant cognitive disabilities might be confusing for employers, postsecondary institutions, and others if the diploma document itself does not indicate that the student earned the diploma through an alternate diploma-pathway. However, as described in section 5.E.iv, a high school transcript is the document that typically outlines the course of study a student has completed to earn

their diploma. This would remain true for students who earn a high school diploma using the alternate diploma-pathway.

Recommendation 2: Timely and Robust Planning for High School

Graduation

Statutory Charges: 1, 2, and 3

Recommendation

In coordination and alignment with recommendations detailed in the IEP Workgroup's 2021 report, the workgroup recommends graduation planning be incorporated into any adopted IEP template and process. The state should establish a set of clear expectations and guidance to ensure graduation planning within a student's IEP has taken place by the time a student enters the 9th grade. And, at the annual IEP or least once per year, the state should require LEAs to monitor progress toward the graduation plan, and no later than the end of a student's sophomore year in high school, finalize which diploma-pathway a student will utilize to pursue a high school diploma, as noted on a student's IEP. This recommendation does not mean that IEP teams should wait until sophomore year to do any graduation planning, instead this time frame is a recommended critical checkpoint to ensure a graduation plan is in place. Ideally this recommendation would build in concert with recommendations from the IEP Template Workgroup related to incorporating graduation planning into the IEP template and process; and should a statewide IEP template be adopted, additional alignment would be needed. Regardless of whether the state adopts an IEP template, this planning is still essential to ensure students and all members of their IEP teams can assist in helping a student meet all course requirements necessary to earn a diploma.

Proposed Actions

- A. The individual graduation planning process, including pathway determination and confirmation, will need to be included and adopted by the state as part of the IEP as recommended in the IEP Workgroup’s proposed statewide IEP template.
- B. The CDE will need to create guidance, training, and provide informational resources for educators, students, and families about graduation planning and specifically how IEP teams can determine the appropriate diploma-pathway for each student to earn a high school diploma. Training and resources should build upon the training recommended by the IEP Template Workgroup on topics including person-centered planning; disability and countering ableism; self-determination; holding students to high expectations; meaningful postsecondary outcomes, including how students with disabilities can prepare to earn a family-sustaining wage; and the intersectionality of disability, race, and poverty (see also recommendation 5).

Considerations for Adoption and Implementation

Timing for ensuring a graduation plan is in place: While Federal law specifies that transition planning should take place, “beginning not later than the first IEP to be in effect when the child turns 16, or younger if determined appropriate by the IEP Team...”,⁶⁸ the workgroup discussed the need to begin graduation planning as early as possible and practicable, to ensure students had ample time to complete the requirements necessary to earn a diploma. They agreed this recommendation should

⁶⁸ IDEA, 34 CFR § 300.321(b)(2).

not prevent graduation planning from occurring sooner than a student's sophomore year. Many of the workgroup members shared the sentiment that every student should be allowed the opportunity to graduate using the traditional pathway to a high school diploma and shared concerns that finalizing a diploma pathway too soon might limit a student's options. The workgroup recommends graduation planning is finalized no later than a student's sophomore year because they believed this was the latest possible timeline by which a student's graduation pathway could be solidified and a student could still reasonably complete the requirements for graduation.

Recommendation 3: Expand the Opportunity to Earn a High School

Diploma Through Meeting State Minimum Requirements

Statutory Charge: 1

Recommendation

The state should clarify that if an IEP team determines the best path to a diploma is by meeting state minimum graduation requirements only, and not additional LEA requirements, the opportunity for LEAs to allow this currently exists. The state should also provide guidance to LEAs to help IEP teams understand how and when to utilize this pathway for some students with disabilities, as appropriate.⁶⁹

Proposed Actions

- A. The CDE will need to develop guidance for LEAs and IEP teams that outline the options they have within existing statute and regulation and encourage LEAs to allow IEP teams flexibility to plan a course of study, which may include a student

⁶⁹ See section 5.B.i for information about the state minimum graduation requirements.

with disabilities only meeting the state minimum requirements to receive a regular high school diploma. This includes looking at California *EC* Section 51225.3, which allows LEAs to adopt local graduation requirements that exceed the state minimum requirements and also requires LEAs to adopt alternate means for pupils to complete the prescribed course of study, as described in sections 5.B.i and 5.C.i.

- B. To ensure equitable and appropriate application of this pathway across the state, the state will need to establish guardrails through guidance and technical assistance for LEAs and IEP teams. If appropriate, the state should include these guardrails in the state IEP template, if adopted.

Considerations for Adoption and Implementation

Maintaining high expectations: The workgroup discussed whether providing a pathway that requires meeting only state minimum requirements to earn a diploma will create lowered expectations for students with disabilities and allow schools to place students with disabilities on the path to only meet state minimum requirements when they may have been able to meet all state and local requirements with appropriate supports.

The workgroup cautioned against a perception that state minimum requirements for graduation somehow represent “watered down” expectations and shared that currently many LEAs in California require only the state minimum requirements for any student to receive a high school diploma. In that the workgroup’s proposed recommendation and actions place great responsibility on IEP teams to look out for a student’s best interest, providing guidance and training will be important to maintaining high expectations for

every student. Ultimately, this recommendation is intended to help LEAs and IEP teams understand the tools and paths available to them to truly individualize for each student.

Considerations for LEAs with local control: The workgroup discussed why LEAs may not currently utilize the opportunity to allow some students to meet state minimum requirements for graduation, while requiring the majority of students to meet additional local graduation requirements. This may be because other than the statute exempting specific student groups who are deemed transitory, such as foster and homeless youth, migrant youth, and military youth, from having to meet local graduation requirements, there is no explicit provision or allowance codified by the state permitting LEAs to use this option should they have additional local requirements that have been locally adopted. There is also nothing that says they cannot. There was also discussion that allowing flexibility in allowing a student to graduate using state minimum standards gives greater control to IEP teams, giving them the authority to make decisions that supersede LEA locally adopted graduation requirements. Some workgroup members suggested the state clarify the allowance of this pathway as an option for students with disabilities in a newly created section of the law, and also provide specific guardrails for its use.

Recommendation 4: Public Data Reporting

Statutory Charge: 3

Recommendation

The state should ensure transparency in the use of specific graduation pathways through the publishing of an annual public data report that communicates critical information about each LEA and the demographics of the students who are using each

of the diploma pathway designations, and to what extent they are using them. Ideally, the data points would also be publicly available on CDE's DataQuest (the state's online database that allows comparative analyses by state, county, district, and school) so the public could become aware and study what is happening in specific LEAs or regions and notice trends.

Proposed Actions

- A. Depending on the extent of new pathways and a need to collect additional information about existing pathways, CDE may need to create additional data codes or replace existing codes, data definitions, and depending on what is currently being collected determine what would be considered a new data point.
- B. CDE will at a minimum need to plan for any additional data to be added to Dataquest.
- C. The CDE will need to provide training and technical assistance to support LEAs in accurately reporting information related to graduation and graduation pathways (see also recommendation 5).

Considerations for Adoption and Implementation

The workgroup discussed the need for this recommendation to not be burdensome on LEAs or CDE, but felt it is important for the public and decision makers to have access to information to help make informed decisions and do continuous improvement as needed.

Recommendation 5: Training and Professional Development

Statutory Charge: 3

Recommendation

The state should make significant financial and staff resource investment in training and professional development for educators, students, and families related to understanding all diploma pathways, specifically as it relates to high school graduation planning, and what it will require of students to access these pathways. Training and professional development should:

- Acknowledge the role that LEAs play and their responsibility in offering an accessible course of study and pathways that lead to a diploma for every student and prepares them to be successful after high school, including a responsibility to offer inclusive, high-quality grade-level instruction.
- Clarify when a high school diploma can be awarded for an individual student and when receipt of the diploma terminates FAPE (see section 5.E.i).
- Support IEP teams to do early graduation planning for students with a focus on increasing inclusive educational experiences and access to the general education curriculum for students with disabilities beginning in the early grades, so alongside their peers without disabilities, they obtain the foundational skills necessary for later success during high school and beyond.

Considerations for Adoption and Implementation

The need for training: The workgroup felt that further training and professional development is needed to help overcome existing practice barriers that prevent students with disabilities from graduating with a high school diploma (see section 5.F for

description of barriers). This type of guidance was specifically recommended by NCEO during their review of existing alternate diplomas in other states as described in section 5.D.iii. The workgroup identified lack of access and training in current research-based and best practice methods and low rates of inclusion in general education, as causal factors in sustaining large opportunity gaps between students with and without disabilities.

Recommendation 6: Building Upon Existing State Agency Collaborations to Serve Transition-Age Youth

Statutory Charge: 3

Recommendation

The state should build upon and expand existing partnerships established through the state's Competitive Integrated Employment (CIE) Blueprint and the infrastructure created through the federal Workforce Innovations and Opportunities Act (WIOA) to coalesce around shared goals and strategically support youth with disabilities in high school, through encouraging and allowing piloting to demonstrate how LEAs can work to align locally through collaborations such as Local Partnership Agreements, and the braiding of funding and services across programs.

Proposed Actions

- A. California should consider piloting new and strengthening existing partnerships between LEAs, vocational rehabilitation services, community colleges, and local businesses and braid funding to build model programs for training students with disabilities for jobs in their communities while in high school. These partnerships

should focus on bringing additional training and skill building into the high school diploma framework that results in students earning industry-based credentials while enrolled in high school and working toward earning a high school diploma.

Considerations for Adoption and Implementation

To further the work established by the CIE Blueprint and through implementation of the WIOA, the state has an opportunity to take what it has learned and create a truly articulated roadmap to employment for students with disabilities, with pathways to earning a high school diploma playing a key role. The workgroup also expressed the need for more collaboration with the state agencies who have been working together around transition planning that includes engagement with California Community Colleges who are responsible for providing a bulk of the CTE programs in the state. The CDE, DOR, DDS, and Department of Workforce Development should consider co-convening a group of stakeholders to make additional recommendations related to coordination of traditional high school and adult transition programs. The group of stakeholders could advise how agencies could collectively fulfill and support ensuring students are prepared for employment and life post-graduation. This group should also consider whether any of these coordinated efforts should result in students with disabilities meeting additional requirements not otherwise outlined in this report, to earn a high school diploma through an alternate pathway. At minimum, an advisory group should include high school administrators, CTE and community college representatives, adult transition service representatives, parents of students with IEPs, and other relevant stakeholders.

The role of high school: The workgroup believes that students with disabilities should exit high school with a set of skills that prepare them to earn a family sustaining wage and meaningfully contribute to their communities. By providing opportunities for all students with a disability to pursue a high school diploma, more students will be able to reach this goal. The stakeholder survey provided strong support for this: Of 929 stakeholder survey respondents that responded to a question about the role of high school, the majority (83.1 percent) indicated that “the role of high school is to prepare students to earn a family sustaining wage and to be successful in life after high school” while only 16.9 percent indicated that “the role of high school is to provide students with a course of study that prepares them to be successful after college”. The types of integrated pathways proposed by recommendation 6 will help ensure that all students with disabilities, including students with significant cognitive disabilities, have access to pathways that incorporate academic coursework with the development of life skills.

Recommendation 7: Certificate of Completion

Statutory Charge: 3

Recommendation

California should phase out the use of the state certificate of completion as a planned graduation pathway, especially as the state develops new and maximizes existing opportunities and pathways to a high school diploma for all students.⁷⁰

⁷⁰ See section 5.E.ii for information about the certificate of completion.

Proposed Actions

- A. The California State Legislature should eliminate the state exit code reporting option, related to the certificate of completion, and corresponding relevant *Education Code* sections 56390–92 by the date in which the California alternate diploma-pathway is fully available to all students with disabilities.

Considerations for Adoption and Implementation

The inadequacy of the California Certificate of Completion: The workgroup discussed that some stakeholders may argue that removing the certificate of completion as a pathway to high school completion and a state exit code reporting option will leave students who do not earn a diploma, no recognition of their accomplishments. However, as described by section 5.E.ii, a certificate of completion is not rooted in any specific course or academic expectations and the practice of awarding certificates of completion originated because graduation frameworks did not have equitable opportunities for students with disabilities to pursue high school diplomas. Additionally, certificates of completion do not provide value to students seeking employment, postsecondary education, and training. As high school graduation frameworks evolve to provide an opportunity for every student to pursue a high school diploma, the practice of awarding certificates of completion should become obsolete. Removing the certificate of completion option will incentivize LEAs and schools to place students on one of the available diploma pathways. Further, the certificate of completion is only available to students with disabilities, and there is no parallel for other students who are unable to complete their high school diploma. Removing the certificate of completion will support greater alignment between general education and special education frameworks.

8. CONCLUSION

After careful review and discussion about alternate diploma-pathways for students with disabilities, the workgroup concluded that in order to ensure equality of opportunity for every student in California, the state has an obligation to provide a viable pathway for all students that lead to a high-school diploma. Further, they agreed that the largest barriers that exist to increased graduation rates aside from the lack of an existing diploma-pathway for students with significant cognitive disabilities, are the mindsets and beliefs about what students with disabilities are both entitled to, can achieve, and deserve.

With some targeted statutory changes, investments in development and training around the use of an alternate diploma-pathway for students with significant cognitive disabilities, and additional support and guidance to the field in how to maximize success in existing graduation pathways, California has an opportunity to make tremendous strides toward ensuring greater equity for all of its students with disabilities, and allow an opportunity to receive the education and credentials every student needs to pursue a future of their choosing.

With the simultaneous special education reform efforts poised to address all parts of the education system that support students with disabilities, California could put a major stake in the ground by providing multiple accessible pathways for students with disabilities to earn a high school diploma. The Alt Pathways Workgroup believes its vision for all California's students to enter high school knowing they can achieve a high school diploma can soon be a reality. The workgroup also believes that a high school

diploma is one critical gateway to realizing a life of earning a family sustaining wage and freedom to choose one's path.

APPENDIX A: ACKNOWLEDGMENTS

Members of the Alternate Pathways to a High School Diploma Workgroup generously devoted their time and shared their rich experiences and expertise to inform this report.

Workgroup members included:

- Amber Alexander, California Department of Finance
- Jennifer Ann, Santa Clara County Office of Education
- Sarah Apacible-Holm, San Bernardino City Unified School District
- Heather Calomese, California Department of Education, Special Education Division
- Susana Campo, Green Dot Public Schools
- Caroline Castaneda, California Department of Developmental Services
- Joyce Clark, Exceptional Family Resource Center
- Meghan Cosier, Chapman University, Thompson Policy Institute on Disability and Autism
- Amanda Dickey, Santa Clara County Office of Education
- Suzan Dunbar, Foothill Special Education Local Plan Area
- Laila Fahimuddin, California State Board of Education
- Geri Fuchigami, Los Angeles Unified School District (retired)
- Analee Kredel, Orange County Office of Education
- Tanya Lieberman, California Assembly Committee on Education
- Lauren Lindstrom, University of California, Davis School of Education
- Kylee Luchetti, Tuolumne County Office of Education
- Liz Mai, California Department of Finance

- Edward S. Miguel, Port View Preparatory
- Julie Miller, California Department of Education, Special Education Division
- Olivia Raynor, University of California, Los Angeles Tarjan Center
- Eddie Rea, Goodwill Industries and Sacramento City College
- Wayne Richardson, Sanger Unified School District
- Lela Rondeau, Los Angeles Unified School District
- Sue Sawyer, California Transition Alliance
- Douglas Siembieda, Huntington Beach Union High School District
- Maria Turrubiarres, California Department of Rehabilitation
- Lou Vismara, University of California, Davis MIND Institute
- Devin Vodicka, AltSchool
- Nick Wavrin, California Department of Education, Special Education Division
- Stacey Wedin, California Department of Education, Special Education Division
- Joe Xavier, California Department of Rehabilitation
- Liz Zastrow, Lodi Unified School District (retired)

The workgroup was facilitated by Jamie Wong and Kristi Preston, SPED Strategies, and Caitlin Vaccarezza and Rosa Guzman, The Glen Price Group

The Sacramento County Office of Education was honored to have led this work under the direction of Brent Malicote, Connie Lee, David Chun, Kristin Wright, and Superintendent David Gordon.

Special thanks to the Advisory Commission on Special Education (ACSE) for the opportunity to share workgroup updates.

APPENDIX B: WORKGROUP PROCESS

The California Department of Education (CDE) contracted with the Sacramento County Office of Education (SCOE) to convene the Alternate Pathways to a High School Diploma (Alt Pathways) Workgroup to fulfill the workgroup's charge. SCOE engaged SPED Strategies to serve as the content experts and workgroup lead and the Glen Price Group to provide additional facilitation, coordination, and writing support.

SCOE worked closely with CDE to identify and recruit members of the workgroup that met both the requirements of the original legislative charge and represented a diverse group of experts and stakeholders. As described in appendix A, the Alt Pathways Workgroup was comprised of 35 workgroup members including representatives from CDE, DOR, DDS, legislative staff, school districts, charter schools, county offices of education, special education local plan areas, higher education, policy experts, and other practitioners, representing a broad range of lived experience and stakeholders.

The workgroup process included workgroup meetings (full group and small group), joint sessions with the Individualized Educational Program (IEP) Workgroup, and stakeholder engagement.

Workgroup Meetings

The Alt Pathways Workgroup convened in December 2020 and continued to meet monthly through July 2021. All workgroup meetings were held virtually due to the COVID-19 pandemic. Meetings included a combination of presentations, full group discussions, small group breakout discussions, and individual reflection. The following list summarizes the primary focus area(s) of each workgroup meeting:

1. December 17, 2020: Workgroup charge and workgroup member roles and responsibilities
2. January 27, 2021: State and local requirements for earning a high school diploma in California, current outcomes for students with disabilities in California, and pressure points in existing high school graduation requirements, policies, and procedures
3. February 24, 2021: Relevant federal policy, high school diploma frameworks in other states, and potential new framework for California
4. March 24, 2021: Alternate diploma aligned to the state's alternate achievement standards for students with significant cognitive disabilities, including expectations for earning the state defined diploma, the conditions necessary to achieve the ideal student experience, and logistics and governance considerations
 - The March meeting included a presentation from Megan Gross, a special education teacher from Poway Unified School District who shared her experiences in the field around the opportunities and challenges about building creative pathways for students with disabilities
5. April 28, 2021: Alternate pathways for students with disabilities to access the core curriculum to satisfy the requirements for a high school diploma
6. May 26, 2021: Outstanding decision points for workgroup recommendations
7. June 23, 2021: Workgroup recommendations
8. July 21, 2021: Joint session only

Workgroup members also had opportunities to engage in between sessions. In advance

of the February, March, and April meetings, workgroup members were invited to participate in ad hoc discussions to review the proposed content and feedback for each forthcoming full group meeting. Workgroup members were invited to participate in a brief survey in May to inform the discussion for the May meeting.

Joint Sessions with The Individualized Educational Program Workgroup

The Alt Pathways Workgroup also had opportunities for joint working sessions with the IEP Workgroup, which convened on a similar timeline. During these meetings, workgroup members participated in shared learning and had opportunities for cross-sharing about the emerging recommendations of each workgroup. The joint sessions included presentations from the following guest speakers:

- Shiylah Duncan-Becerril, Associate Director, Special Education Division, “Overview of the Data, State of the State in California”
- Heather Hough, Executive Director, PACE (Policy Analysis for California Education), “Organizing Schools to Serve Students with Disabilities in California”
- Kristin Brooks, Executive Director, Supporting Inclusive Practices; and Kevin Schaefer, Director of Equity and Inclusive Practices, Supporting Inclusive Practices, “Supporting Inclusive Practices”
- Beth Foraker, Co-Director of University of California, Davis Redwood SEED (Supported Education to Elevate Diversity) Scholars Program, personal story from a parent’s perspective

Stakeholder Engagement

The workgroup also engaged external stakeholders to inform the discussion and development of recommendations through surveys and presentations. Primary stakeholder engagement activities included:

- Presentations during public meetings of the California's Advisory Commission on Special Education in April and August 2021
- A public statewide webinar with over 300 registered participants that was recorded and shared for additional viewing in June 2021
- A stakeholder survey circulated in June 2021 to gather input on some of the critical questions relevant to the emerging workgroup recommendations
 - The survey received over 900 responses from a wide range of stakeholders from over 90 ZIP codes across California and was available in English and Spanish

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Transition Related Resources

California Transition Alliance

<http://www.catransitionalliance.org/content.aspx?id=1561&title=Resources>

Disability Rights California

<https://serr.disabilityrightsca.org/serr-manual/chapter-10-information-on-transition-services-including-vocational-education/10-3-what-transition-services-are-included-in-california-special-education-laws/>

Transition Guide from US Department of Education Office of Special Education

<https://sites.ed.gov/idea/files/postsecondary-transition-guide-may-2017.pdf>

Secondary Transition Planning Resources - California Department of Education

<https://www.cde.ca.gov/sp/se/st/>