PURPOSE
This document guides Individualized Education Program (IEP) teams that are considering whether a student identified as eligible for special education services is working toward earning a high school diploma or a Certificate of Completion (COC). Students with disabilities and their parents/guardians should be given adequate notice of the requirements for the various high school graduation options available, and IEP teams should evaluate several factors before determining the appropriate graduation option.

The graduation options available to students are determined by the local educational agency (LEA)/district board policies. These options may include:

- A regular high school diploma based on the state-mandated requirements
- A diploma based on University of California (UC) A-G requirements
- LEA/district specific diploma requirements
- A certificate of completion.

Table 1.1 shows a comparison of the different graduation options.
<table>
<thead>
<tr>
<th>High School Subject Area</th>
<th>State-Mandated Requirements for High School Diploma (EC Section 51225.3)</th>
<th>California State University (CSU) Requirements with a High School Diploma</th>
<th>University of California (UC) Requirements with a High School Diploma (A-G subject requirements)</th>
<th>Certificate of Completion (Education Code [EC] Section 56390)</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>Three years</td>
<td>Four years of approved courses</td>
<td>Four years of approved courses</td>
<td>The LEA/district may award a student with a disability a COC if the following requirements, (a), (b), or (c), are met.</td>
</tr>
<tr>
<td>Math</td>
<td>Two years, including one year of algebra I (EC Section 51224.5)</td>
<td>Three years, including algebra, intermediate algebra, and geometry</td>
<td>Three years of college-preparatory math, including or integrating the topics covered in elementary and advanced algebra and two- and three-dimensional geometry; four years recommended</td>
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</tr>
<tr>
<td>Science</td>
<td>Two years, including biological and physical sciences</td>
<td>Two years, including one year of biological and one year of physical science with a lab</td>
<td>Two years with a lab required, chosen from biology, chemistry, and physics; three years recommended</td>
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</tr>
<tr>
<td>History</td>
<td>Three years, including United States history and geography; world history, culture, and geography; a one-semester course in American government and civics, and a one-semester course in economics</td>
<td>Two years, including one year of U.S. history or U.S. history and government and one year of other approved social science</td>
<td>Two years, including one year of world history, cultures and historical geography and one year of U.S. history, or one-half year of U.S. history and one-half year of American government or civics</td>
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</tr>
<tr>
<td>Language other than English</td>
<td>One year in visual or performing arts, foreign language, or career technical education</td>
<td>Two years in same language required</td>
<td>Two years in same language required; three years recommended</td>
<td></td>
</tr>
<tr>
<td>Visual and Performing Arts</td>
<td>One year in visual or performing arts, foreign language, or career technical education</td>
<td>One year of visual and performing arts chosen from dance, drama/theater, music, or visual art</td>
<td>One year chosen from dance, music, drama/theater, music, or the visual arts</td>
<td></td>
</tr>
<tr>
<td>Physical Education</td>
<td>Two years, unless the student has been exempted from the requirements based on EC Section 51241</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
<td>(a) The individual has satisfactorily completed a prescribed alternative course of study approved by the governing board of the school LEA/district in which the individual attended school or the school LEA/district with jurisdiction over the individual and identified in his or her IEP.</td>
</tr>
<tr>
<td>Electives</td>
<td>Not Applicable</td>
<td>One year*</td>
<td>One year*</td>
<td>(b) The individual has satisfactorily met his or her IEP goals and objectives during high school as determined by the IEP program team.</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(c) The individual has satisfactorily attended high school, participated in the instruction under his or her IEP, and has met the objectives of the statement of transition services.</td>
</tr>
</tbody>
</table>

* Must be chosen from approved academic courses in history/social science, English, advanced mathematics, lab science, foreign language, social science, or visual and performing arts.
HIGH SCHOOL DIPLOMA

The term “regular high school diploma” is defined as a diploma fully aligned to grade-level standards. Students typically complete mandated academic courses and must earn a minimum grade point average to receive a standard high school diploma. California Education Code 51225.3 defines the mandated high school courses needed to earn a regular high school diploma.

The U.S. Department of Education’s Office of Special Education and Rehabilitation notes that the vast majority of students with disabilities should have access to the same high-quality academic coursework as all other students in the state. The IEP team determines which graduation option is most appropriate for the student, given the LEA/district’s options as determined by the governing board.

Not all LEAs/districts offer a regular high school diploma based on the state-mandated requirements; some offer diplomas based on A-G requirements that provide greater access to college and exceed the state’s minimum requirements. It should be noted that although LEAs/districts cannot deny a student a standard high school diploma based on their disability, the student does not automatically obtain one because of their disability.

Separately, some LEAs/districts have also chosen to provide a differentiated diploma option. While functionally equivalent to a standard high school diploma, a school’s governing board must also approve a differentiated diploma. This alternative could allow LEAs/districts a wider interpretation of how students demonstrate mastery towards the prescribed set of courses within the differentiated diploma option.

In addition, certain student groups may be exempt from the LEA/districts’ graduation requirements. Under Assembly Bill 167/216, students identified as either foster youth or on probation, who are removed from their homes and transfer high schools after their second year, may graduate and earn a standard high school diploma by completing the minimum state graduation requirements if, at the time of transfer, they cannot reasonably complete additional local school LEA/district requirements within four years of high school. Similarly, under Assembly Bill 1806, students identified as homeless are exempt from all coursework and other requirements that are in addition to the state minimum requirements of 13 year-long academic courses needed to earn a diploma.

HIGH SCHOOL DIPLOMA EQUIVALENCY ASSESSMENTS

The California Department of Education has approved the use of three high school equivalency tests: the General Education Development Test (GED); High School Equivalency Test (HiSET); and Test Assessing Secondary Completion (TASC) for students 18 years old, and some 17 years old, to receive a California High School Equivalency Certificate. Postsecondary institutions, such as the University of California (UC) and California State University (CSU) systems, will accept a high school equivalency test in place of a diploma. However, students must still meet specific coursework, grade point average, and ACT or SAT examination requirements.

Students at LEA/districts who are 16 years old or have been enrolled in the tenth grade for one academic year have the additional option to complete the California High School Proficiency Exam (CHSPE). The CHSPE consists of two sections: an English-language arts section and a mathematics section. Students who pass both sections of the CHSPE are issued a Certificate of Proficiency by the California State Board of Education. The CHSPE is the legal equivalent of a high school diploma in California, and a student who receives it may leave high school early, with verified parental approval. If a student with an IEP passes a high school equivalency test, the student is still eligible to receive educational placement and services under their IEP at the LEA/district until they meet the requirements of one of the graduation options offered.

CERTIFICATE OF COMPLETION

The COC option is available to students who cannot complete the requirements for a regular high school diploma that the LEA/district offers. These students are eligible for educational placement and services under their IEP. The COC option does not equal a regular high school diploma. The graduation option that the IEP team chooses shall be documented clearly as part of the Transition Plan, as well as marked on the IEP’s offer of Free and Appropriate Public Education (FAPE)/Educational Settings page.

IEP teams can waive academic courses the student attempted prior to being identified as progressing towards a COC. Conversely, while a student is progressing towards a COC, IEP teams should convene to analyze factors preventing a student from successfully completing a required academic course. The IEP team should evaluate if
the IEP goals, services, and supports are reasonably calculated, and if the student will receive further educational benefit through repeating a specific course. While students may have access to the general education curriculum, most students receiving a COC participate in California’s Alternate Assessment testing system, which is documented on the IEP’s Statewide Assessment page.

A student with a disability who has satisfied the following three requirements, but who has not satisfied the requirements for a diploma, may receive a COC:

- Satisfactory completion of a prescribed alternative course of study as identified on the student’s IEP; or
- Satisfactory achievement of the student’s IEP goals and objectives during high school as determined by the IEP team; or
- Satisfactory high school attendance, participation in the instruction prescribed in the student’s IEP, and achievement of the objectives in stated in the transition plan.

**GRADUATION REQUIREMENTS FOR STUDENTS ATTENDING NONPUBLIC SCHOOLS**

Students with disabilities attending nonpublic schools (NPS) must meet the same criteria for graduation as peers attending the placing LEA/district work with nonpublic schools to determine the graduation eligibility for students with disabilities placed at nonpublic schools. The LEA/district evaluates the student’s transcript to verify the student’s eligibility for completion of courses leading to either a high school diploma or a COC. For more specific information regarding NPS, refer to the Special Education Local Plan Area (SELPA) NPS/Residential Treatment Centers Guidelines located on the SELPA website at [http://bit.ly/nps-rtc-handbook](http://bit.ly/nps-rtc-handbook).

**GRADUATION AND COMMENCEMENT EXERCISES**

A student with disabilities who meets the criteria for a COC is eligible to participate in any graduation ceremony and any school activity related to graduation in which students of similar age without disabilities would be eligible to participate. The decision on whether to allow students with disabilities, who do not meet the requirements to earn a standard high school diploma or a COC, to participate in graduation commencement exercises must be reviewed and aligned with the LEA/district’s board-approved school policies.

**TIMELINE FOR STUDENTS NO LONGER ELIGIBLE**

Table 2.1 details when a student is no longer eligible under the Individuals with Disabilities Education Act (IDEA) to receive specialized instruction and related services through an IEP. LEAs/districts should continue to provide a student an appropriate offer of a FAPE until the student is no longer eligible to receive it.

LEAs/districts may neither develop nor implement an IEP that extends beyond eligibility dates. Table 2.1 lists guidelines regarding terminating special education services. A prior written notice (PWN) is required upon the termination of special education services.

<table>
<thead>
<tr>
<th>Table 2.1 Conclusion of Special Education Services</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>If the student’s 22nd birthday is between January and June, the student may continue through the remainder of the fiscal year (school year and extended school year [ESY] ending July 1).</td>
<td>EC 56026(c)(4)(A)</td>
</tr>
<tr>
<td>If the student’s 22nd birthday is in July, August, or September of the new fiscal year, then the student may not begin a new fiscal year (school year and ESY ending July 1 of this year).</td>
<td>EC 56026(c)(4)(B)</td>
</tr>
<tr>
<td>If the student’s 22nd birthday is during October, November, or December, the student shall be terminated from the program on December 31 of current fiscal year, unless the student would otherwise complete his or her IEP at the end of the current fiscal year.</td>
<td>EC 56026(c)(4)(C)</td>
</tr>
<tr>
<td>The student graduates from high school with a regular high school diploma.</td>
<td>EC 56026.1(a)</td>
</tr>
</tbody>
</table>
**PRIOR WRITTEN NOTICE: HIGH SCHOOL DIPLOMA**

The PWN is provided to inform parents/guardians and/or adult students prior to the LEA/district a change to the educational placement or provision of a FAPE based on the criteria of students completing their requirements for a high school diploma. The PWN should be completed immediately following the exit IEP and provided to parents/guardians and/or adult students without delay prior to ending services. Table 2.2 list steps when completing a PWN.

Table 2.2: How to Fill Out a Prior Written Notice: High School Diploma

The LEA/district should do the following:

- Fill out the date the PWN is being sent to the parent/guardian and/or adult student.
- Fill in the student’s name within the first paragraph.
- Enter the specific reason that options other than a regular high school diploma are not appropriate for the student.
- In the final paragraph, print the name of the contact person in case the parent/guardian and/or adult student disagrees with the decision of graduation based on the student meeting the criteria for a high school diploma; include the contact’s phone number and/or email address.
- Sign the letter with your name and title.
- Enclose a copy of procedural safeguards when sending the PWN.

**PRIOR WRITTEN NOTICE: CERTIFICATE OF COMPLETION**

The PWN is provided to inform parents and/or adult students prior to the LEA/district’s termination of the educational placement or provision of a FAPE based on the criteria of students completing their high school requirements for a COC. The PWN should be completed immediately following the exit IEP and provided to parents/guardians and/or adult students without delay prior to ending services. Table 2.3 list steps when completing a PWN.

Table 2.3: How to Fill Out a Prior Written Notice: Certificate of Completion

The LEA/district should do the following:

- Fill out the date the PWN is being sent to the parent/guardian and/or adult student.
- List the name of the student within each paragraph.
- Enter the date of the last IEP and describe the offer of FAPE, including the date the IEP will conclude. In this section, if the LEA/district offers the FAPE in an alternative program, document the offer of the FAPE.
- In the final paragraph, print the name of LEA/district contact person in case the parent/guardian and/or adult student disagrees with the decision of promotion based on a COC, with the contact’s phone number and/or email address.
- Sign the letter with your name and title.
- Enclose a copy of procedural safeguards when sending the PWN.
APPENDIX 1
### SAMPLE COURSE OF STUDY AREAS TO CONSIDER FOR IEP TEAMS

<table>
<thead>
<tr>
<th>Students’ Postsecondary Goals &amp; Personal Gains for Their Futures</th>
<th>Diploma</th>
<th>Certificate of Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>The student’s employment goals require a diploma; education/training goals require a diploma for eligibility for enrollment and/or financial aid.</td>
<td>The student who set the goal to achieve the certificate needs a meaningful certificate that prepares them for the “next environment.”</td>
<td></td>
</tr>
</tbody>
</table>

| Academic History | The student has participated in a course of study that meets graduation requirements with/without accommodations or modifications. | The student’s course of study focuses on earning a certificate: functional skills, life skills, and vocational and community-access skills. |

| Tests and Scores | Academic tests are based on grade-level standards. | Academic tests are based on alternate achievement standards. |

| Transition in the IEP | The student met high school graduation goals. Adequate transition services were provided to prepare for postsecondary goals. | The student met transition goals to earn a certificate of completion. |

| LEA/District Diploma Requirements | The student met LEA/district diploma/graduation requirements. | The student did not meet LEA/district diploma/graduation requirements. |

| Graduation Status at Age 18 | The student met all criteria to graduate based on LEA/district standards and the IEP. | The student needs additional education to prepare for the transition. |

| Credit Status | Because an LEA/district must provide a FAPE to a student until they earn a high school diploma or reach the age of 22, when a student reaches the age of 18 or 12th grade, an IEP team does not need to automatically consider switching the student’s IEP from earning a high school diploma to receiving a COC. IEP teams may consider other viable options for such students, such as staying enrolled beyond the initial four-year graduation date, adult education, community college, or earning a Graduate Equivalency Diploma (GED) or industry certification. | Students earning a COC throughout high school and who do not complete the coursework required to earn a diploma can opt to stay in school up to age 22 in transition-age programs. |

The following are additional issues to discuss with IEP teams, as well as parents and students:

- Start the conversation by the end of the eighth grade.
- The following are additional issues to discuss with IEP teams, as well as parents and students:
- A diploma cannot be denied to students who have earned it, have met all graduation requirements, and have been provided adequate transition services that prepare them for meeting their transition goals.
- Maturity and readiness for adulthood are not considerations for this issue. Few parents are convinced that their 18-year-old student is ready for adulthood. This issue speaks to having adequate post-school resources and programs in the community.
- LEA/Districts need to carefully review their graduation requirements and the barriers that a lack of employment creates.
- There is increasing emphasis on students with intellectual disabilities transitioning to integrated, competitive employment and earning competitive wages.
APPENDIX 2
SAMPLE HIGH SCHOOL GRADUATION POLICY

High School Graduation Requirements
Students and parents/guardians will be provided with the graduation requirements upon entering High School. Graduation requirements exceed California’s requirements in anticipated preparation for college entrance. Alternate graduation pathways are offered under state laws.

HIGH SCHOOL GRADUATION PATHWAYS

Path 1: Advanced Diploma (units)
All courses are taken at (unless otherwise approved), and all requirements are met. Should an advanced student exhaust all coursework in mathematics prior to his or her senior year, the student will not be required to take a fourth year of mathematics to earn the advanced diploma.

Path 2: Proficient Diploma (units)
All courses are taken at (unless otherwise approved), and all are requirements met.

Path 3: Grandfathered Path (units)
This pathway is only for transfer students. Students must make up any failed courses. These students may be excused from particular graduation requirements based upon the requirements of their previous school. These students will take the typical course load of their peers based on the number of years in attendance at . The prescribed coursework will be no more than the number of years for which a student is enrolled at . The school counselor will develop and communicate this plan to parents within the student’s first semester at .

Path 4: Credit Recovery Path (units)
This pathway is for students with severe credit recovery needs. The minimum requirements are identical to the proficient diploma. Credit recovery students may take remediated courses through an online provider at the discretion of the school counselor. All students will be advised to take UC/CSU-level courses; however, students on this path should be made aware that not all courses will meet UC/CSU requirements and therefore may not qualify them to apply to a four-year university directly after graduation. The school counselor will develop and communicate this plan to parents.

DIFFERENTIAL GRADUATION AND COMPETENCY FOR STUDENTS WITH DISABILITIES

Prescribed Course of Study
The Governing Board recognizes that students with disabilities may have a course of study that provides them with a FAPE and that modifications to the school’s regular course of study may be needed on an individualized basis to provide a FAPE. Under law, each student’s IEP or Section 504 team shall determine the appropriate goals, and any individual accommodations for measuring the academic achievement and functional performance of the student on daily instruction and state and district assessments. The IEP or Section 504 team shall also determine the appropriate graduation track for each student with a disability based on the level of individualized accommodations and modifications documented in the IEP or 504. Units may vary, but the minimum requirement shall include:

- 3 years of English
- 2 years of Math (including Algebra 1)
- 3 years of History (including Western Civilization, United States History, one semester of Government, and one semester of Economics)
- 2 years of Science (including Biology and a Physical Science)
- One year of Fine Arts
- Required elective
- Senior Project
- __________ hours of community service
CERTIFICATE OF COMPLETION

shall designate a COC, instead of a high school diploma, if a student with an IEP has met one of these requirements:

• Satisfactorily completed a prescribed alternative course of study approved by the Board of Directors; or
• Satisfactorily met his/her IEP goals and objectives during four years of high school as determined by the IEP team; or
• Satisfactorily attended high school, participated in the instruction under his/her IEP, and met the objectives of the statement of transition services.

The LEA/district shall ensure a student with disabilities who meets the criteria specified above shall be eligible to participate in any graduation ceremony and any school activity related to graduation in which a graduating student of a similar age without disabilities would be eligible to participate. In addition, the LEA/district shall ensure that the student will continue to have access to special education and related supports and services until the student meets the criteria to receive a high school diploma or until age 22.

Legal References
California EC Section 56341-56345
California EC Section 56390-56392

SCHOOL REQUEST FOR EARLY GRADUATION

Students who expect to meet graduation requirements before their senior year must file a written petition, Request for Early Graduation, to graduate early. The petitioning student must meet with the school guidance counselor to develop a written plan, the Early Graduation Checklist, to meet all graduation requirements (Board Policy 4020).

School Senior Contract
All students who have earned senior standing will have to complete and submit a senior contract at the beginning of their senior year. The senior contract outlines behavior expectations that all students must meet to participate in senior activities and the commencement ceremony. Students who do not submit the senior contract will be held to the same behavioral standards. Failure to abide by school policies during the senior year can result in loss of senior privileges, including participation in the commencement ceremony. All students who meet graduation requirements will earn a high school diploma.

SCHOOL COMMENCEMENT POLICIES

All graduates shall wear:

• gown
• cap
• tassel
• stole

Honors Cords

• Students with a 3.5 to 3.9 grade point average (GPA) will wear one cord.
• Students with a 4.0 GPA and above will wear two cords.
Heritage Graduates

- Students who have attended [ ] to 12th grade, without interruption, wear a [ ] stole with the [ ] crest and a white cord.

Valedictorian/Salutatorian

- The student with the highest overall GPA in the graduating class is named the Valedictorian. The student will be presented with the Valedictorian medal.
- The student with the second highest overall GPA in the graduating class is named the Salutatorian. The student will be presented with the Salutatorian medal.
- Both Valedictorian and Salutatorian will present a speech at the graduation.
- If there are two or more students with identical GPAs, administration will determine the Valedictorian or Salutatorian based on the rigor of academic courses.

School Awards

- One student is awarded the “[ ]” award for the most community service hours submitted. The student will be presented with an “[ ]” medal.
- One student is awarded the “[ ]” (discipline/self-control) award. The student shall be nominated by staff and will be presented with a medal.
- One student is awarded the “[ ]” (virtue/character) award. The student shall be nominated by the staff and administration.
- Seniors who have been members of Junior National Honor Society all four years of high school may wear the [ ] stole over the [ ] stole.

Other Graduation Attire Requests

- No other stoles or medallions will be permitted unless administrative approval is given.
- Program pins and ropes may be worn if they represent an [ ] program, or they are from a nationally approved organization and have administrative approval.
- No other requests for items to be worn with graduation attire will be granted.
Frequently Asked Questions

Q: What should IEP teams consider when designating which students can benefit from receiving a Certificate of Completion?

A: Typically, students designated to receive a COC include students who:
   - Have significant cognitive impairments.
   - Participate in alternate statewide assessments, such as the California Alternate Assessment in English-language arts, mathematics, and science.
   - Cannot demonstrate subject competency in diploma-track classes, even with differential proficiency standards, accommodations, and modifications to the required courses and curriculum.

The designation does not include students who have recently transferred into a school and whose prior school determination was that the COC, English language development status, or behavior or academic skills without commensurate cognitive and adaptive deficits.

Q: What happens when a student is designated to receive a Certificate of Completion, but fulfills the requirements of a high school diploma?

A: An LEA/district must issue a diploma when any student meets regular high school graduation requirements. Withholding a diploma to meet procedural requirements of the IDEA would be discriminatory.

Students with significant cognitive impairments should work towards a high school diploma until the IEP team has exhausted accommodations, modifications, and differential proficiency standards, and has determined that an alternative course of study (i.e., certificate of completion) is most appropriate.

The governing board of the LEA/district determines alternative courses of study for students with significant cognitive impairments earning a certificate of completion attending high school within their LEA/district. Alternative courses for students earning a COC must assist the student's IEP and Individual Transition Plan (ITP).

Q: What is an Individual Transition Plan?

A: The ITP is a written plan designed to help prepare students for passage from school to post-school life. [20 U.S.C. Sec. 1401(34); California EC Secs. 56462 & 56345.1] The ITP must be based on the student’s needs, preferences, and interests and reflect the student’s own goals. Objectives, timeliness, and people responsible for meeting the objectives should be written into the ITP (and made part of the IEP). Transition planning and development of the ITP are part of the IEP process.

Q: How does the California Education Code describe the course of study?

A: The California EC lists the course of study pertaining specifically to earning a diploma. EC Section 51225.3 defines the coursework that all students receiving a diploma of graduation from a California high school must have completed while in grades 9–12, inclusive. It also allows other coursework adopted by the LEA/district’s local governing board.
Q: What factors should an IEP team consider in determining the ITP course of study?
A: The IEP team should consider the students’: 
- Goals upon completing high school
- Education/training, employment, and independent living
- Academic history and special education
- Test data, including statewide testing scores and reading level
- Curriculum/course descriptions as related to LEA/district graduation requirements
- Attendance
- Behavior
- Graduation status

Q: Can a student continue to get transition services after receiving a Certificate of Completion?
A: Yes. If a special education student has not met the requirements for graduation (including the objectives of the statement of transition services), the LEA/district must continue to provide transition services to the student until she or he turns 22 years of age.

Q: Does the LEA/district have to help students with disabilities transition from high school to adult life?
A: Yes. Federal special education law requires transitional planning services for students with disabilities regardless of which agencies provide support or educational services to the student. Beginning by the first IEP after a student turns 16 (or younger if the IEP team determines it is appropriate) and updated annually, the IEP must contain a statement of appropriate measurable postsecondary goals. The goals must be based on age transition assessments related to training, education, employment, and independent living skills where appropriate. The IEP must also contain a statement of needed transition services for the student that focuses on the student's courses of study (such as participation in advanced placement courses or a vocational education program). In addition, the IEP must contain, when appropriate, a statement of the interagency responsibilities. [20 United States Code Sec. 1414(d)(1)(A); 34 Code of Federal Regulations Secs. 300.320(b) & 300.321(b)(3).]