**California Department of Education**

# Report to the Legislature, the Executive Director of the State Board of Education, and the Director of Finance: Alternative Coursework Interim Report



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## Executive Summary

This report is required by Senate Bill 101, Section 188, Provision 144 of the California Budget Act of 2023. This bill required the identification and development of alternative coursework and performance tasks for educators to use with students with disabilities (SWDs). In June 2023, SB 101 amended and extended the work outlined in SB 154 of the California Budget Act of 2022. The CDE contractor, WestEd, completed the following:

* A national review of best practices for improving graduation rates for SWDs that identified three major findings: (1) inclusive practices create flexible instruction and assessment conditions, (2) non-traditional assessment models such as portfolio assessments and performance tasks allow students to demonstrate proficiency, and (3) mastery-based grading is a tool to make grading and graduation requirements clear at the course level.
* A statewide needs assessment survey of Special Education directors focused on graduation practices for SWDs, which identified the following three themes: (1) locally defined graduation requirements are the primary tool for providing alternative means to graduation, (2) states were mixed in the statewide strategies for applying alternative means, and (3) increasing inclusive and flexible instructional design supports graduation rates. Interviews with key state leads, district leads, educators, and focus groups pertaining to their strategies for improving graduation rates for SWDs were also conducted.
* Recruited and managed a team of subject matter experts and coalition partners to create resources, performance tasks, and guidance documents to support local educational agencies (LEAs) in adopting and implementing this initiative. A summary of the timelines and partnership activities is included in this report.

This report is available on the California Department of Education’s (CDE) Special Education Laws, Regulations, and Policies web page at <https://www.cde.ca.gov/sp/se/lr/>.

If you have any questions regarding this report, please contact John Burch, Education Administrator, Special Education Division, at 916-445-4891 or at [JBurch@cde.ca.gov](mailto:JBurch@cde.ca.gov).

## Background

Graduating with a diploma is a critical milestone that demonstrates a student’s readiness to transition beyond public school and pursue future goals. This is true for all students, including those with complex disability-related support needs who are eligible for the California Alternate Assessment (CAA). The CAA is based on standards-aligned content and follows the same testing cycles and content areas as the California Assessment of Student Performance and Progress (CAASPP). When a student’s Individualized Education Plan (IEP) team identifies them as eligible for the CAA, their instructional programming also often aligns with the CAA and its standards-aligned alternate achievement benchmarks. Students with disabilities (SWDs) locally assessed as eligible for the state’s alternate assessment still have a right to access grade-level content—including content tied to graduation.

Each state’s alternate assessment, as is the case with the CAA, is mandated by the federal Every Student Succeeds Act (ESSA) to be limited to less than 1 percent of the total student population in the state. Even when students are eligible for alternate assessments (e.g., CAA in California), SWDs should still have the opportunity to learn in core classes alongside their peers without disabilities, which allows these students the same opportunity to meet graduation requirements—potentially through alternative means of expression. This approach assumes the competence of these students and supports their right to attempt to meet graduation standards, particularly in their areas of strength as identified by themselves, their families, and IEP teams.

This report highlights the importance of giving SWDs access to core classes and alternative coursework options for earning a standard diploma. It also examines how other states and LEAs support this student population when alternate graduation certifications are necessary. It provides the CDE with an overview of the available certifications and diploma types offered, while clarifying that further exploration is needed beyond the scope of the Inclusive Access to a Diploma: Reimagining Proficiency for Students with Disabilitiesinitiative.

The Inclusive Access to a Diplomainitiative is led by the CDE Special Education Division and WestEd partnership and has CDE representatives from the Career and College Transition Division and Curriculum Frameworks and Instructional Resources Division as well as the State Board of Education. These partners make up the CDE Partners team, which provides direct oversight, creation, and curation of initiative strategy and materials. In addition to these partners, the Initiative team has recruited subject matter experts to provide examples of alternative means of expression in each focused content area.

**Timeline for Initiative Deliverables**

During Year 1 of this project, WestEd focused on the team conducting national and multi-state scans of promising practices for providing SWDs multiple ways to meet graduation requirements. Then, in Year 2 of this project, WestEd centered on defining a strategy and beginning the process to carry out the defined strategy focused on providing SWDs different ways to meet coursework requirements, starting with Algebra and Integrated Math 1 requirements, needed to earn a standard diploma. Next, in Year 3, WestEd will center on continuing the strategy started in Year 2, completing guidance and sample coursework for English Language Arts (ELA), an elective course, Biology, U.S. History, and Physical Education (PE). And finally, in Year 4 of this project, WestEd will target providing guidance to the CDE regarding ways to communicate and implement the project strategy within the state.

The initiative team has also created a Best Practice Guide and constituent-specific Practice Briefs on how to offer viable alternative means of expression to SWDs, including students eligible for the CAA. The Best Practice Guide details the overall project strategy, and the constituent-specific Practice Briefs center on providing IEP teams clear and concise guidance on how to select and communicate with SWDs eligible for the CAA individualized alternative means of expression within the IEP process.

The work for this initiative began in October of 2023, and all required deliverables will be finalized by September 30, 2025. All materials for the project will be delivered to the CDE on or before June 30, 2025.

## National Review, State Needs Assessment, Focus Groups, and Local Educational Agency Interviews

### National Review: Strategies for Students with Disabilities Eligible for Alternate Assessments

#### Context on Alternate Assessments

SWDs often underperform in comparison to other students without disabilities in both graduating on time with a standard high school diploma and translating their graduation into successful outcomes as engaged members of their communities (Johnson, et al., 2017). The rate of individuals with disabilities obtaining competitive employment as adults has continually fallen behind the rate of the general population by at least 50 percent over the past 10 years (Bureau of Labor Statistics, 2022). For all students, receiving a standard high school diploma is important for advancement in employment positions and is required for entry into many post-secondary educational settings. Yet, as much of the research has indicated, SWDs are receiving a standard diploma at lower rates than their peers and, therefore, have less access to opportunities (Gaumer Erickson, Kleinhammer-Tramill, & Thurlow, 2007; Guillermo et al., 2021). For students eligible for alternate assessments, consistent opportunities to work toward and earn a standard diploma have historically been limited.

Alternate standards, such as the Core Content Connector Standards used in the development of the CAA, modify the depth and breadth of what students are required to learn and are reserved only for students with the most complex needs in a limited number of subject areas that are assessed statewide (ELA and Mathematics). Identifying a student as eligible for the CAA leads to all state-assessed content areas being based on the alternate assessment. This leaves the IEP team and local educators to determine which standards or areas of instructional focus are most appropriate for these students in the other content areas, which makes it even more important for educators to think carefully about ways to offer these students the opportunity to meet standard graduation requirements.

IEP teams, schools, and district staff must first assess whether or not these students can meet standard diploma requirements through alternative means of expression. The “Identifying Viable Alternative Means of Expression: A Decision Tool for IEP Teams” document provides guidance on making these decisions in partnership with students and families. This practice brief provides a decision-making flow chart that allows an IEP team to assess which communication or assessment methods most align to a student’s needs and strengths and how to select viable alternative means of expression.

### Implications in Other States

States vary in the diploma options available to students with and without disabilities. A 2019 study conducted by the National Center on Educational Outcomes (NCEO) found that, of the 47 states that responded to their survey, 20 states offered only honors or standard diplomas to their students, and 27 states offered more than one diploma (Johnson et al., 2019). These authors reported that diploma possibilities across states are relatively similar, with states continually exploring new ways to organize around graduation requirements based on the changing needs of their student populations (Johnson et al., 2019). An issue of particular significance when exploring graduation options for SWDs is the use of certificates instead of creating alternative means of expression, such as the use of performance tasks, portfolios, projects, and other non-traditional forms of assessment and assessment tools, that allow students to communicate their understanding of coursework in a varied array of ways. These alternate means allow students to demonstrate completion of the graduation requirements.

Ensuring that SWDs have opportunities to earn a standard diploma is essential for closing achievement gaps and improving postschool outcomes, especially for students eligible for alternate assessments who often have less access to classrooms where these requirements are taught (Hanreddy & Ostlund, 2020; Kleinart et al., 2015, Thurlow, Lazarus, & Rogers, 2020). These modifications have historically led these populations to have much lower rates of receiving a standard diploma than their peers (Office of Special Education Programs [OSEP], 2021).

#### Federally Approved Diploma and Certification Options for Graduation

The ESSA recognizes three common graduation exit types: regular high school diploma, state-defined alternative diplomas, and equivalency awards such as certificates of completion and general equivalency diplomas (ESSA, n.d.) (see Table 1). The Inclusive Access to a Diploma initiative focuses on supporting students in earning a regular high school diploma. While this report also examines alternate diploma and certification options, the objectives of the Inclusive Access to a Diploma initiative do not include further engagement on types of graduation certifications.

**Table 1: Graduation Exit Type Definitions**

| **Graduation Exit Type** | **Description and Considerations** |
| --- | --- |
| Regular High School Diploma  (In Scope—Inclusive Access to a Diploma) | Students receive a regular high school diploma after having successfully met a state-mandated set of graduation requirements in a cohort of years, often either four or five years, from the start of their ninth-grade year.  This diploma signals to colleges and employers that students have completed all the necessary course and exam requirements for high school and are ready for post-secondary settings. |
| State-Defined Alternate Diplomas  (Out of Scope—Inclusive Access to a Diploma) | State-defined alternate diplomas allow students who are eligible for the alternate assessment to be awarded a state-defined alternate diploma. This diploma indicates that students have received instruction that is aligned to the standards yet provided pursuant to IEP goals and often as a modified curriculum.  This diploma is intended to appear to colleges and employers as a regular high school diploma. Its appearance, though, is dependent on state and local language and requirements. |
| Certificates  (Out of Scope— Inclusive Access to a Diploma) | Certificates of completion or attendance are provided as an option when a student with a significant disability is unable to meet any or all of the state-mandated requirements for graduation and instead is receiving instruction in alternate, modified coursework aligned to their IEP goals.  These certificates do not meet the requirements for a regular high school diploma and, therefore, indicate to colleges and employers that students have not completed necessary coursework and/or exam requirements to meet graduation requirements. |

(ESSA, n.d.)

#### Impact of Every Student Succeeds Act’s State-Defined Alternate Diploma Type Option

The ESSA allows states to create state-defined alternate diplomas to include students who take alternate assessments in some federal graduation rate calculations. These diplomas must be standards-based and aligned with state graduation requirements but can be modified to meet the needs of students with significant disabilities. This gives states the authority to include students participating in alternate assessment in the adjusted cohort graduation rate if the diploma meets the requirements (Thurlow, Lazarus, & Rogers, 2020).

The primary distinction between graduating with a standard diploma and graduating with a state-defined alternate diploma is how the coursework is designed and implemented. SWDs who are determined eligible for the alternate assessment most often are following modified coursework aligned to the standards, such as California’s Core Content Connector standards. It is anticipated that states will utilize an alternate diploma.

Since the introduction of state-defined alternate diploma in 2015, states using the alternate path has increased, which indicates progress in offering more diploma options to SWDs. Prior to 2015, 46 states and territories were issuing certificates of completion or attendance instead of a standard high school diploma for an average of 17 percent of SWDs exiting high school (OSEP, 2014). As of 2021–22 reporting, 47 states and territories were still distributing certificates to SWDs; however, the data indicated that the percent of the total number of students receiving certificates went down to 11 percent and that six states were reporting SWDs receiving an alternate diploma (OSEP, 2023). Furthermore, in 2024, NCEO surveyed states regarding their implementation of the state-defined alternate diploma for students on the alternate assessment and found that 14 either had a “state-defined alternate diploma” or were planning to design one (NCEO, 2024).

An important note: When states offer more exit options other than standard diplomas, they often have fewer students with an IEP earning the standard diploma (Gaumer Erickson, Kleinhammer-Tramill, & Thurlow, 2007). This trend further highlights the importance of IEP teams first considering the alternative means of expression to meet graduation requirements before assuming their only option for a student eligible for an alternate assessment is an alternative to the standard diploma or a certificate of completion.

## Findings from State Needs Assessment Survey

As part of the *Inclusive Access to a Diploma* initiative, 472 educators from various California LEAs participated in a survey and focus groups in 2023. The goal was to gather insights on their knowledge of diploma options for SWDs and their experiences with offering flexible pathways to a high school diploma for these students. The summary below includes overall findings from the statewide survey and focus groups with a particular emphasis on responses that referenced support for SWDs eligible for the CAA.

#### Statewide Survey Respondents

The statewide survey was distributed through a CDE listserv to all special education directors of LEAs within the state of California, including Special Education Local Plan Areas (SELPAs), county offices of education, district special education administrative staff, and through the California Teachers Association (CTA), to a broad range of teacher networks. A total of 472 individuals responded to the survey, with 53.7 percent identifying as teachers and 46.3 percent identifying as administrators.

#### Statewide Survey Results

When asked about the number of diploma options offered within each LEA, 96.4 percent reported they offered multiple diploma and certificate options for students with and without disabilities upon graduation. This large percentage indicated a wide array of exit credential options are available for students across the state and infrastructure for the use of a state-defined alternate diploma has been built in most LEAs across the state.

It is important to note that the intent of the survey and focus groups was to gather information on providing SWDs not eligible for the CAA with the opportunity to graduate with a standard diploma. Thirty-six responses specifically addressed the need for students eligible for the CAA to also earn a standard diploma, which suggests a small yet strong contingent with interest in this effort. In fact, when asked to reimagine the infrastructure in their agency for SWDs to receive a standard diploma, the teachers, who made up eight of these 36 responses, all expressed a need for more professional development and resources to better understand and implement flexible, alternate diploma pathways for their students eligible for the CAA. The administrators, who made up the other 28 responses, highlighted the importance of clear guidelines and support from the state to effectively offer alternate diploma pathways for students eligible for the CAA.

While this is a small subset of the larger respondent group, the responses provide a compelling perspective to consider given that the survey questions specifically stated the focus was on students not eligible for the CAA. The collection of the following responses suggests a growing desire among California educators for students taking the CAA to participate in the same opportunities to receive a diploma as their grade level peers:

* One response stated, “We believe ALL students have abilities beyond their disability, and they deserve to showcase their skills through a diploma that is based on their individual needs and unique experiences as a human being.”
* Another response advocated for support in “developing common course descriptions to support students who engage in the CAA to gain access to earning a diploma.”
* An additional response focused on “Professional Development for teachers to develop greater subject matter knowledge for the purpose of breaking down concepts, pairing concepts with real-world applications and providing supports and accommodations [in order to] help make an ideology shift in our teachers that students taking the CAA can achieve higher levels of competency.”

#### Key Findings

1. Awareness and Implementation: There is a varied level of awareness among educators about the different diploma options available for SWDs. Many respondents indicated a need for more comprehensive training and clearer communication from the state regarding these options, especially to clarify differences among options.
2. Professional Development Needs: Both teachers and administrators requested additional professional development opportunities focused on alternative assessment strategies and the implementation of standards-aligned content for students eligible for the CAA.
3. Resource Allocation: Respondents emphasized the need for additional resources, such as instructional materials and support staff, to effectively implement alternate diploma pathways.
4. Collaboration and Support: Effective implementation of diploma options requires collaboration between general and special education teachers as well as support from school leadership and the community.
5. Challenges and Barriers: Common challenges identified include a lack of understanding of the alternate diploma pathway, insufficient resources, and the need for ongoing support and guidance from the state.

One Southern California district described taking steps toward supporting students eligible for the CAA to be on California’s alternate pathway to a diploma. The district has “written eight courses (currently board-approved) that are aligned to the Core Content Connectors that would also mirror a ‘typical’ course progression for a student to meet the 230 credits needed for graduation. The courses are focused on vocational life skills that would support the student with success on the CAA.” Much like Kansas and Wisconsin, this LEA’s school board approved the local curriculum, and the courses are being identified as modified and titled as graduation requirements, which results in a locally defined alternate diploma pathway for students eligible for the CAA.

## Statewide Focus Groups

In spring 2023, the *Inclusive Access to a Diploma* initiative conducted eight focus groups with California constituents involved in graduation outcomes for SWDs. Each focus group varied in size and participation with the following totals for participant representation across all eight events. Participants included:

* Five secondary or recently graduated students with an IEP
* Seventeen family members of students with disabilities
* Nine special education or general education teachers
* Five administrators
* Five secondary counselors
* Fifteen IEP team members
* Five community representatives

Participants were recruited through email and phone contact in collaboration with statewide organizations representing these groups, which ensured at least five representatives from each key constituency.

The focus groups’ primary objective was to gather information for a statewide strategy to supply alternative means of expression in California and support all SWDs in receiving a standard high school diploma. For a detailed summary of their findings, please refer to the Written Needs Assessment Summary web document available through WestEd at <https://wested.ent.box.com/s/2vofjlf73xvip7a4h35vzozciitj1a9i>, which summarized the findings from focus groups with hyperlinks to focus group protocols and related notes. Many participants, however, were particularly eager to discuss the diploma pathway options for SWDs eligible for the CAA. Specifically, they sought further guidance on the alternate diploma pathway options. Two key elements discussed in the focus groups were programming and considerations for students eligible for the CAA. As a result of these discussions, the following goals and supports were identified in relation to the two key elements:

1. Rigor should not be compromised. The focus group further identified several key areas they would need support in to ensure that rigor is not compromised:
   1. Standard-aligned Rubrics and Corresponding Success Criteria: Focus group constituents reported the importance of developing detailed rubrics or assessment criteria that outline the specific expectations and performance levels for the alternative means of expression and assessment.
   2. Tools and Knowledge to Assess Alternative Means for Rigor: Focus group constituents wanted guidance on how to assess different alternative means options to ensure they align with academic standards or learning outcomes for both SWDs not eligible for the CAA and those eligible for the CAA. The alignment emphasis demonstrated that students were assessed on the same rigorous content and skills as they would through traditional assessments.
   3. Engage and Reinforce Performance-based Standards: Focus group constituents wanted guidance on ways to establish clear performance standards for the alternative means of expression or assessments that reflect the expected level of rigor. Respondents indicated it would be helpful if exemplary performance tasks that showed real-life application of the standards were also included in the resources.
   4. Provide Resources Specific to Professional Development: The focus group participants requested professional development opportunities to educators, including teachers, counselors, and administrators, to ensure they have a thorough understanding of the pathways for a diploma and certificate track. This training should cover the requirements, support services, and available resources for both pathways, which would enable educators to effectively guide and support students.
   5. Create Strategies that Monitor and Evaluate: Focus group participants recommended the state continuously monitor and evaluate the effectiveness and clarity of the pathways for a diploma and certificate track. They suggested collecting feedback from students, parents, educators, and other stakeholders to identify areas of improvement and make necessary adjustments.
2. Certificated track and diploma track needs to be clear to all (students, parents, counselors, teachers, administrators). The focus group further identified several key components that would support and streamline requirements and how they are communicated to all stakeholders:
3. Provide Comprehensive Information: The field is looking for comprehensive information from the CDE to students, parents, and educators about the requirements, options, and expectations for both diploma and certificate tracks. This information should be easily accessible through websites, brochures, handbooks, and informational sessions.
4. Clearly Define Requirements: Focus group constituents reported wanting clearly articulated requirements for both diploma and certificate tracks, including the necessary coursework, assessments, and performance criteria. Clearly outlining these requirements will help students and families understand the different pathways and make informed decisions.
5. Offer Resources Specific to Guidance andCounseling: Focus group constituents appreciated knowing different communities crossing a varied array of roles (e.g. teachers, students, families, counselors, administrators, community members, and IEP team members) were represented in focus groups and stressed the importance of students having access to guidance counselors or advisors who can provide individualized support and assistance in navigating the pathways. These professionals can help students understand the requirements, explore their interests and abilities, and make informed decisions about which pathway aligns best with their goals.

As the key elements indicate, focus group respondents asked for clarity on the diploma pathway versus the certificate pathway for students participating in the CAA. Secondary educators (administrators and teachers) specifically reported frustration with the historical practice of making the determination at a student’s middle school IEP meeting that students with complex and significant disabilities eligible for the CAA would be following a certificate track instead of a diploma pathway. This practice results in a statement on the IEP indicating that the student will receive courses in a modified course of study often in a special education setting, and the statement follows the student into high school where they are subsequently unable to participate in diploma pathway coursework. As a result, these students receive a certificate instead of a high school diploma when they exit high school. Respondents contend that changes to district practices at an earlier age are necessary to ensure SWDs who are eligible for the CAA are also eligible to receive the newly initiated alternate diploma pathway. In several focus groups, secondary educators expressed this concern even after focus group facilitators explained that the alternate pathway to a diploma is a different focus from this initiative.

## Local Educational Agency Interviews

Simultaneously with the constituent focus groups, the *Inclusive Access to a Diploma* initiative team used the results from the California LEA Survey to select nine LEAs for in-depth interviews. Administrators and staff working in special education and graduation requirements were recruited, particularly if the survey indicated they were engaged in graduation practices that supported alternative means for SWDs and self-selected as willing to participate in interviews with the initiative team. Participating LEAs included: Oakland Unified School District (USD), West Contra Costa USD, San Benito County Office of Education, San Benito High School District, Aspire Public Schools, Marysville Joint USD, Fairfield Suisun USD, Santa Barbara USD, and Monterey Peninsula USD.

The focus of the interviews was to gather samples from different districts showing how they were offering different graduation options for SWDs enrolled within their systems. The interviews included questions on these topics such as providing an overview of their strategies for supporting SWDs in having multiple ways to earn a diploma, essential understandings and trainings their staff needed to have to administer these strategies, and the steps the district took to deploy these strategies. Most interviews focused primarily on district administrators either tied to secondary transition or graduation efforts or special education directors or related administrative delegates with knowledge of graduation practices. The web document titled [CDE 3.31.24 Progress Report (WestEd)](https://wested.box.com/s/h0mnt6ny5nl3jb5ktn9t8whbbgfj7o1f) provides a high-level summary of findings from LEA interviews and includes hyperlinks to raw notes from each district interview. A list of the questions presented to district representatives is provided in the web document titled [LEA Interview Questions (WestEd)](https://wested.box.com/s/1lhdrkmqhxy8jli52r5fgoxjehi7o171).

**Table 2: High-Level Summary of Findings from LEA Interviews**

| **Local Educational Agency** | **Summary of LEA Practices** |
| --- | --- |
| Aspire Public Schools | * Establish a true co-teaching model * Have multiple graduation pathways to respond to students’ unique and individual needs * Work toward universal design for learning and mastery-based learning model |
| Fairfield Suisun Unified School District | * Adopt [Tiered diploma options (Link)](https://docs.google.com/document/d/1fxWsVX9l7UDKQ0eXo98N2Wi1aZyi83BLG7xp7GZqPvw/edit) * Address staffing issues that comply with COVID-union resistance to take on more/new protocols * Establish cross-departmental communication |
| Marysville Joint Unified School District | * Adopt a “Collaborative teaching” model specifically for the math pathway courses as these are the biggest challenge for students * Acquire additional technical assistance to help with new co-teaching model * Address staffing issues related to teacher, student ratio |
| Monterey Peninsula Unified School District | * Adopt multiple graduation pathways: minimum requirement diploma (different from A-G) * Allow for slowing down of coursework, students are retaining and learning coursework better * Address teacher shortage |
| Oakland Unified School District | * Look to the CDE around definitions of modified state standards Assembly Bill 181 * Explore modified standards as guides across all contents * Establish guidance for Gen Ed systems and master scheduling; guidance for counselors, particularly around rolling this out and demonstrating what this looks like on paper * Provide training for employers |
| San Benito High School District | * Improve co-teaching model that was adopted in 2013, and it was in full implementation before 2020 * Share data regarding students with IEPs and students without IEPs passing more classes in co-taught classes than non-co-taught classes * Establish equitable grading practice with using rubrics * Establish planning for universal design for learning and differentiation |
| San Benito County Office of Education | * Utilize more universal design for learning and project-based learning * Celebrate success of summer school program where students gain credits for credit recovery program * Identify Algebra 1 as a gatekeeper course for many students with IEPs * Recruit more teachers on board with Career and Technical Education pathways |
| Santa Barbara Unified School District | * Recognize the efforts of a transition work group established to support families and community members to determine what a diploma “means” * Celebrate the establishment of co-teaching in 2016 and how this addressed alternative means for grading and their current grading practices were * Acknowledge how the co-teaching effort expanded supports beyond the A-G requirements and grading practices that were more rigid in this way * Celebrate that the school board passed a resolution for more inclusion focused activities and professional learning |
| West Contra Costa Unified School District | * Celebrate that Sylvester Greenwood Academy experienced a lot of success in their credit recovery programs * Establish tangible support and professional development on “how do I go from the strict systems that are already in place to providing alternate means and different pathways to show knowledge?” * Recognize the teacher institutions that are supporting this type of shift - not just admin/LEA/State Educational Agency supporting the ideas |

Similar to the results of the focus groups, many interviewees were also interested in more information regarding the alternate diploma pathway and more clarity between SB 154 and AB 181, which led to discussions about graduation options for SWDs eligible for the CAA. Some of the same focus group voiced concerns and confusion was evident with the interviewees. The following key themes were directly associated with students eligible for the CAA:

* LEAs are confused by the initiatives outlined in AB 181 and SB 154. AB 181 supports SWDs needing modifications of grade level content to still earn a diploma, which are most often students participating in the CAA, whereas SB 154 supports SWDs not needing modifications, most often are students participating in the CAASP. The confusion lies in how to assess whether SWDs need modified content or simply alternative means of demonstrating understanding.
* Districts reported needing guidance on maintaining rigor while still providing accessible and appropriate options for SWDs.
* LEAs need consistent and calibrated assessment practices for alternative means.
* LEAs need appropriate options for students with the most complex needs and disabilities.
* LEA educators continually reported clear state guidance and frameworks as essential for knowing how to support the implementation of alternative means in a consistent way for all SWDs.

A resounding need for more clarity, guidance, and support regarding the alternate diploma pathway for students eligible for the CAA emerged from the survey, focus groups, and interviews.

The results indicate that with greater guidance and support from the CDE a significant number of LEAs may create a local alternate high school diploma for students eligible for the CAA, which would follow in line with the growing number of states and territories providing the same option.

## Comprehensive Summary of Findings

The collective belief from interviews with three state agencies, as well feedback from survey respondents and focus group participants, indicates a consensus that all students should be granted a standard diploma. The states who have moved forward with this were driven by a commitment to equity and ensuring students with the most complex needs were afforded the same right to a diploma as all other students.

The interviews and surveys highlighted important considerations for language, recommendations, and diploma options. While state agencies and some California LEAs are creating alternate pathways for this student population, they are not yet employing flexible, performance-based tasks or alternative means of expression as a means to meet graduation requirements. Instead, states are exploring other options like a state-defined alternate diploma as a means for students to continue to receive their instruction in an alternate setting using modified, state standards-aligned content. Local California districts are also exploring locally approved options to develop content aligned with standards that meet the requirements for alternate pathway diploma.

While the scan, interviews, survey, and focus groups identified pathways and options for the CDE to consider supporting LEAs in granting diplomas to SWDs eligible for the CAA, the *Inclusive Access to a Diploma* initiative does not encompass providing state training, technical assistance, or infrastructure support regarding alternate diploma pathways.

## California’s Graduation Requirements & Findings on Best Practices

### A Review of California’s Current Options for Students with Disabilities Eligible for the California Alternate Assessment

California offers three pathways for SWDs to receive a high school diploma, aligning with the ESSA requirements. These pathways are available to all students, including SWDs eligible for the CAA and include:

1. Standard High School Diploma: Local school boards may issue diplomas to SWDs who have met both state-mandated and local school board graduation requirements, which may include alternative means of expression, which is a core focus of this initiative.
2. Alternate Pathway to a Diploma: Students eligible for the CAA may receive a diploma based on standards-aligned content. In March 2024, the CDE issued guidance to LEAs on this alternate pathway. According to these guidelines, students may graduate with a high school diploma through the alternative diploma pathway if they:
   1. Entered ninth grade in the 2022–23 school year,
   2. Are taking the state alternate assessments, and
   3. Are completing standards-aligned content coursework.
3. Certificate of Completion: A non-diploma certificate indicating that the student has successfully completed their high school learning experience.

The alternate pathway elevates the exit options for students eligible for the CAA from a certificate to a diploma, allowing local school boards to create opportunities for eligible students to earn a high school diploma. This recommendation also provides LEAs with guidance on addressing modified standards and alternate settings. Since this pathway was recently introduced, no data is available yet to show how many students have used this pathway to graduate with a diploma in California.

## California’s Minimum Graduation Requirements

The minimum coursework required for graduation in California is:

* Three courses in ELA/English Language Development
* Two courses in Mathematics, including Algebra I and one other math course.
* Two courses in science, including Biology and Physical Science
* Three courses in History Social Sciences, including US History, World History, and Government/Economics
* One course in an elective, either World Languages, Visual and Performing Arts, or Career and Technical Education
* Two courses in PE

To follow the ESSA recommendations for designing an alternate diploma pathway, local school boards and educators would need to design alternate coursework that clearly defines the alignment to the state standards in these courses. The March 2024 brief from the CDE provides language permitting educators and local school boards to begin constructing modified coursework that is aligned to the state standards and meets the qualifications for the alternate diploma pathway.

Performance tasks, designed and curated by the *Inclusive Access to a Diploma* initiative, offer universally designed, flexible, high leverage alternative means of expression to show proficiency in standards required for graduation. The performance tasks balance the rigor of the standard with the flexible expression preferences and needs of the individual student.

As such, students eligible for the CAA may benefit from accessing these tasks to show proficiency with a standard. If educators were designing alternative coursework to meet the requirements of an alternate diploma pathway, accessing the performance tasks may provide relevant, timely, and practical activities that educators can use to measure proficiency in content area coursework. This is especially true for students who may be able to demonstrate proficiency through alternative means in some but not all coursework. However, those resources are designed based on unmodified standards, alternative coursework designed on alternate standards is outside of the scope of the *Inclusive Access to a Diploma* initiative.

## Findings of Best Graduation Practices from other State Education Agencies and Territories

To explore the graduation practices occurring in other states for SWDs eligible for the alternate assessment, the *Inclusive Access to a Diploma* initiative reviewed the *Diploma Ecosystem Scan* conducted in 2023 by WestEd, looking for states conducting work focused on providing SWDs taking the alternative assessment with options for earning a standard diploma*.* That scan assessed how State Education Agencies (SEAs) provided SWDs with alternative means of expression for meeting graduation requirements. The team also compared those policies and practices with publicly released graduation data for SWDs. SEAs were considered promising if 0–2 percent of students received a certificate of completion in lieu of a diploma. The scan revealed a few states that issue standard diplomas to all their students, including SWDs eligible for the alternate assessment.

The team reviewed graduation practices in New Jersey, Kansas, and Wisconsin, states with promising strategies for awarding diplomas to SWDs. These states demonstrate varying approaches to inclusivity, equity, and access in education, offering insights into California’s efforts to support students eligible for the CAA.

### New Jersey: *All Means All* Mission and Meeting Every Student Succeeds Act’s Requirements

#### Ecosystem Scan

New Jersey has a portfolio model for high school diploma options available to students who are unable to pass the New Jersey Graduation Proficiency Assessment for English Language Arts or Mathematics. The portfolio model has been especially beneficial for SWDs not participating in the alternate assessment, English language learners, and students experiencing homelessness, to be able to receive a standard high school diploma.

Because New Jersey students participating in the alternate assessment are not required to complete the proficiency assessment, the state has established other more individualized considerations and guidelines to support this population of students in receiving a high school diploma. Students eligible for the alternate assessment receive a state-issued alternate high school diploma from the state of New Jersey that is specified by the IEP as a local school district high school diploma. At present this diploma does not meet all of the ESSA requirements for being included in federal graduation rates as a high school diploma and federal reporting indicated that New Jersey issued certificates to 38 percent (7,560/19,735) of their SWDs in the 2021–22 reporting year as compared to 0 percent in the 2018–19 reporting year (OSEP, 2024).

New Jersey remains steadfast in the belief that all students receive a diploma and are transparent that this practice may not meet the ESSA requirements. “New Jersey laws (e.g. N.J.A.C. 6A:14-4.11) permit students with IEPs that include modifications or exemptions to specific graduation requirements to be granted diplomas. However, the ESSA requires that only those students who meet standard graduation requirements can be counted in the Adjusted Cohort Graduation Rate (ACGR). Students with IEPs who did not meet the state course requirements because of a modification or exemption to the course requirements in their IEP will be removed from the numerator when calculating the federal version of the ACGR.” (NJDOE, 2024)

#### Interview

New Jersey’s interview reinforced the results from the state scan. Agency representatives felt strongly that SWDs eligible for the alternate assessment should not be limited in their access to a high school diploma as a result of having an identified disability. Consequently, guidance to local school districts results in SWDs participating in the alternate assessment receiving a high school diploma. While it doesn’t meet federal reporting guidelines, in all other ways it still functions as a diploma.

In New Jersey, the alternate assessment exists to provide a modified pathway to meet the standard state assessment requirements. Despite this, New Jersey believes in the importance of SWDs on the alternate assessment receiving a diploma upon exiting, and as such adopted language and procedures that guide LEAs to offer high school diplomas to their students. They have also explicitly articulated that while this recommendation remains the belief of the state department of education, they understand that to meet the ESSA federal reporting guidelines the issuance of that diploma does not currently count toward the numerator calculation of students graduating with a standard high school diploma.

### Kansas: Local Control and Individualized Education Program Language Guidance

#### Ecosystem Scan

Kansas’ mission is for all students in the state to graduate with a high school diploma. State guidelines and regulations are aligned with NCEO’s language to ensure SWDs are included in receiving a high school diploma. Teachers supporting SWDs eligible for the alternate assessment can refer to specific guidance Kansas offers in the participation and delivery guide for the Dynamic Learning Maps (DLM) that articulates that having an identified disability should not limit a student’s access to receiving successful outcomes within the school setting and beyond high school (KSDE, 2022). The DLM content, like the Core Content Connectors in California, represents a modified version of standards and coursework requirements. In addition to aligning content to the DLM, Kansas encourages access for students eligible for the alternate assessment as evidenced by their inclusion of language directly from NCEO and the Individuals with Disabilities Education Act (IDEA) in their IEP Team Decision Making for the Alternate Assessment Guide (see callout box) (KSDE, 2023, p. 18).

Kansas offers guidance to school districts for how to ensure students are making adequate progress toward graduation, but ultimately the local school boards determine which students are issued a high school diploma. The local school board decides whether the courses SWDs, which are eligible for the alternate assessment, are taking meet the requirements for graduation, even when they are on alternate academic achievement, extended standards. At present, all students in Kansas receive a standard high school diploma (OSEP 2024), indicating no school boards have issued any alternate exiting documents such as a certificate of attendance or completion.

#### Interview

Kansas’ interview expanded greatly on the culture and mission set forth in the scan’s findings. The SEA offers considerable guidance to the local school districts on the language and policies they adopt that support all students receiving a high school diploma if they have completed the credits necessary for graduation. Kansas does not specify the curriculum teachers and districts must provide, yet they do use language directly from the NCEO and IDEA regulations indicating that using alternative standards may delay a student’s ability to graduate on-time with their grade level peers. According to the interviewees, IEPs often note that a “Student is using an alternate graduation plan that is attached,” accompanied by an attachment outlining the courses the student completed to meet graduation requirements. The emphasis on local control coupled with the state’s belief that all students should receive a high school diploma represents an effort from Kansas to ensure equitable access for SWDs to graduate with a diploma.

### Wisconsin: Equitable Access and General High School Graduation Course Requirements

#### Ecosystem Scan

Considerable effort has been made by the Wisconsin Department of Public Instruction (WDPI) to ensure students eligible for an alternate assessment receive a high school diploma. Wisconsin has created extensive guidance documents and statutes to ensure LEAs issue high school diplomas to all students (WDPI, 2020). Wisconsin, like Kansas, provides local districts with the autonomy to establish the local requirements of their high school diploma as it conforms to the state’s standards and guidelines. They specifically state that “a school board may use the goals and objectives in the IEP to satisfy academic performance criteria under its high school graduation policy” (WDPI, 2020, I.8). Ultimately, the state grants the local school district and the IEP team the decision-making power to determine if a student’s educational program meets the requirements for receiving a diploma. As a result, most students eligible for an alternate assessment receive a diploma (OSEP, 2023).

Wisconsin state guidance specifically states that “School boards have authority to design graduation policies that recognize coursework modified from the general curriculum. A competency-based approach could be used to demonstrate proficiency in designated subjects to earn credits leading to a regular high school diploma. Some schools use a parallel curriculum taught through special education classes to meet course credit requirements. Parallel curriculum should link to the district’s general education curriculum and state content standards or the Extended Band Standards. A school board may use the goals and objectives in the IEP as an alternative means to satisfy academic performance criteria under its high school graduation policy. Whatever approach a school board chooses, it should be clearly stated within the local school board graduation policy and followed by IEP teams or other staff involved in decisions about a student’s academic performance (WDPI, 2020, I.7).”

#### Interview

The WDPI stated that the decision for all students to receive a high school diploma was centered in equity. They shared an Equity Decision and Policy Tool, which they use to frame the conversation about who should receive a diploma based on equitable access to post-school outcomes ([WDPI,](https://dpi.wi.gov/sites/default/files/imce/cte/CPA/2019_09_Equity_policy_tool.pdf) 2019). They often reference the tool’s recommendation to carefully consider the intentional and unintentional consequences when making an educational decision for a student. With regards to graduation, if the unintentional consequence of not receiving a high school diploma will prevent a student from having access to equitable adult outcomes after high school, they strongly encourage LEAs to do their due diligence to make sure the student receives a diploma. Wisconsin highly recommends LEAs issue all SWDs, including those participating in the alternate assessment learning LEA-defined modified content, a standard high school diploma.

One factor that Wisconsin identified as central to ensuring that all students have this equitable access to receiving a high school diploma is how state requirements for credits for graduation are organized and identified. While the state requires a similar number of credits to most other states, e.g. four credits of ELA, three credits of Math, etc., it does not require certain named courses like Algebra 1 or Geometry ([WDPI,](https://dpi.wi.gov/graduation/requirements) n.d.). Having a number of required graduation credits across each general content area allows LEAs to enroll SWDs participating in the alternate assessment in graduation requirement courses that provide IEP programming aligned with the standards through a modified program. Wisconsin’s stance on equitable access, their emphasis on local decision making informed by their explicit guidance, and their general graduation requirements allow local school districts the decision-making ability to provide students on the alternate assessment with a high school diploma.

## Final Recommendations

This report recommends that the CDE develop training, technical assistance, and support for LEAs on this topic specific to the requirements and strategies outlined within the Alternate Pathway to a Diploma work being done within the Special Education Division.

Further recommendations and guidance for this population fall outside the scope for the *Inclusive Access to a Diploma* initiative, except for ensuring the initiative materials and guidance direct California educators to recognize the capabilities of SWDs eligible for the CAA and increases awareness among educators of these students’ right to access courses where graduation requirements are being taught. Additionally, the materials produced by the *Inclusive Access to a Diploma* initiative can equip educators with the skills to implement these values by exploring all possible avenues for providing viable alternative means of expression for SWDs eligible for the CAA — identifying potential ways these students can fulfill some or all of the requirements needed to earn a regular or standard diploma.

## Appendix

Avellone, L., Camden, J., Taylor, J.,& Wehman, P. (2021). Employment outcomes for students with intellectual disabilities in post-secondary education programs: A scoping review. *Journal of Post-Secondary Education and Disability, 34*(3), 223-238.

Bureau of Labor Statistics (BLS, 2022). Persons with Disability Labor Force Characteristics. Retrieved from <https://www.bls.gov/news.release/pdf/disabl.pdf>

CDE (2024). *California Department of Education Guidance Document for Alternative Diploma Pathway for Students who Qualify for the California Alternate Assessment*. Found at: <https://www.cde.ca.gov/sp/se/lr/om082523.asp>

CDE (2023). *California Department of Education State Minimum High School Graduation Requirements*. Found at <https://www.cde.ca.gov/ci/gs/hs/hsgrmin.asp>

Every Student Succeeds Act (ESSA, n.d.) Section 802 Definitions of Graduation Exit Types: 802.6.23.A.ii.l. Found at <https://www.everystudentsucceedsact.org/title-vlll>

Guillermo, M.S., Tucker, M.S., Corona, V., McFarlane, F.R., & Jacobs, R. (2021). Pursuing Graduation: Differences in work experience support for young SSI recipients pursuing diplomas versus certificates. *Career Development and Transition for Exceptional Individuals, 44*(2), 110-119. DOI: 10.1177/2165143421989409

Gaumer Erickson, A. S., Kleinhammer-Tramill, J., & Thurlow, M. L. (2007). An analysis of the relationship between high school exit exams and diploma options and the impact on students with disabilities. Journal of Disability Policy Studies, 18(2), 117–128. <https://doi.org/10.1177/10442073070180020201>

Hanreddy, A. & Ostlund, D. (2020). Alternate curricula as a barrier to inclusive education for students with intellectual disabilities. *International Electronic Journal of Elementary Education, 12* (3), 235-247. DOI 10.26822/iejee.2020358217

Johnson, D. R., Thurlow, M. L., Qian, X., Anderson, L., National Center on Educational Outcomes, Applied Engineering Management Corporation (AEM), Council of Chief State School Officers (CCSSO), National Association of State Directors of Special Education (NASDSE), & WestEd. (2019). Diploma Options, Graduation Requirements, and Exit Exams for Youth with Disabilities: 2017 National Study. NCEO Report 409. In *National Center on Educational Outcomes*. National Center on Educational Outcomes.

Kleinert, H., Towles-Reeves, E., Quenemoen, R., Thurlow, M., Fluegge, L., Weseman, L., & Kerbel, A. (2015). Where students with the most significant cognitive disabilities are taught: Implications for general curriculum access. Exceptional Children, 81, 312-328. doi:10.1177/0014402914563697

KSDE (2022). Kansas State Department of Education Guidelines: Dynamic Learning Maps Participation Guidelines for Kansas. Found at: <https://www.ksde.org/Agency/Division-of-Learning-Services/Career-Standards-and-Assessment-Services/CSAS-Home/Assessments/Dynamic-Learning-Maps-DLM-Essential-Elements>

KSDE (2023). IEP Team Resource: Making Decisions about Participation in the Alternate Assessment. Kansas State Department of Education Guide found at: <https://www.ksde.org/Portals/0/SES/DLM/DLM-IEPTeamResource-MakingDecisions.pdf>

Newman, L., Wagner, M., Knokey, A.-M., Marder, C., Nagle, K., Shaver, D., Wei, X., with Cameto, R., Contreras, E., Ferguson, K., Greene, S., and Schwarting, M. (2011). *The Post-High School Outcomes of Young Adults with Disabilities up to 8 Years After High School. A Report from the National Longitudinal Transition Study-2 (NLTS2)*. Menlo Park, CA: SRI International.

NJDOE (2024). *New Jersey Department of Education SID Management Student Data Handbook, V 8.9.* Trenton, NJ.

OSEP (2024). IDEA Section 618 Data Products: State Tables Part B Exiting Table 1, 2021-2022. Found at <https://data.ed.gov/dataset/idea-section-618-data-products-static-tables-part-b-exiting-table-1/resources>

OSEP (2023). Fast Facts: Children Identified with an Intellectual Disability. Brief Found at: <https://sites.ed.gov/idea/osep-fast-facts-children-identified-with-intellectual-disability/?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term->

OSEP (2021). SOURCE: U.S. Department of Education, Office of Special Education Programs, Individuals with Disabilities Education Act (IDEA) database, retrieved February 2, 2021, from [Individuals with Disabilities Education Act (IDEA) | U.S. Department of Education](https://www.ed.gov/laws-and-policy/individuals-disabilities/idea)

Thurlow, M., Lazarus, S. & Rogers, C. (2020). *What Alternate Assessments and Diplomas Really Mean for Students with Significant Disabilities.* Presentation slides found at: <https://nceo.umn.edu/docs/Presentations/CEC2020ThurlowLazarusRogers.pdf>

Lazarus, S. S., Fleming, K., Rogers, C. M., Ressa, V. A., Hinkle, A. R., & Quanbeck, M. (2024). *2023 survey of states: Trends, accomplishments, and challenges.* National Center on Educational Outcomes. Found at: <https://nceo.info/Resources/publications/OnlinePubs/StateReports/2023_survey_of_states.html>

Wisconsin Department of Public Instruction (WDPI, 2020). Information Update Bulletin 10.08: High School Graduation and Students with Disabilities: How Students with Disabilities Meet the High School Graduation Requirements. Found at <https://dpi.wi.gov/sped/laws-procedures-bulletins/bulletins/10-08#q7>

Wisconsin Department of Public Instruction (WDPI, 2019). *Equity Decision and Policy Tool*. Found at <https://dpi.wi.gov/sites/default/files/imce/cte/CPA/2019_09_Equity_policy_tool.pdf>

Wisconsin Department of Public Instruction (WDPI, n.d.) *Graduation Requirements.* Found at: <https://dpi.wi.gov/graduation/requirements>