Graduation Policies for Students with Significant Cognitive Disabilities Who Participate in States' AA-AAS



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Graduation Policies for Students with Significant Cognitive Disabilities Who Participate in States' AA-AAS

Martha L. Thurlow, Debra A. Albus, Sheryl S. Lazarus, and Miong Vang

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Project Officer: David Egnor

NCEO Core Staff

Martha L. Thurlow, Director Deb A. Albus Laurene L. Christensen Linda Goldstone James Hatten Sheryl S. Lazarus Kristi K. Liu Michael L. Moore Rachel F. Quenemoen Christopher Rogers Vitaliy Shyyan Miong Vang Yi-Chen Wu

National Center on Educational Outcomes University of Minnesota • 207 Pattee Hall 150 Pillsbury Dr. SE • Minneapolis, MN 55455 Phone 612/626-1530 • Fax 612/624-0879 http://www.nceo.info

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Executive Summary

Graduation requirements and diploma options for students with the most significant cognitive disabilities who participate in states' alternate assessments based on alternate achievement standards (AA-AAS) were the focus of this policy analysis. We found that nearly 70% of states' policies indicated that students with the most significant cognitive disabilities who participate in the AA-AAS can receive a regular diploma. The criteria for doing so in these states were extremely varied, from those that have the exact same requirements to those that allow the IEP team to set the criteria.

In states with policies that indicated that students with the most significant cognitive disabilities who participate in the AA-AAS could not receive a regular diploma, all but one state indicated that other end-of-school documents (e.g., certificates, special diplomas) were available to these students. States that allowed students with the most significant cognitive disabilities who participate in the AA-AAS to receive a regular diploma and states that did not both generally had one or more end-of school documents (other than the regular diploma) that were the same.

Gathering the information on whether students with the most significant cognitive disabilities who participate in the AA-AAS could receive a regular diploma was a difficult task. The information was not easily found on states' websites. Verification was used to confirm what was found or to provide information where none was found. Despite the difficulties that we encountered, the information that we found and that was provided during our verification process provides important information for the field. Our findings should provide a basis for discussions within states as they consider their policies in light of college and career readiness imperatives. As a result of our analyses, we agree with the recommendations of Thurlow and Johnson (2013) for steps that states may want to take in addressing graduation requirements for students with the most significant cognitive disabilities:

- 1. Ensure that students with the most significant cognitive disabilities are in classes that promote high expectations and are based on college- and career-ready standards.
- 2. Involve stakeholders (e.g., educators, parents, postsecondary education program representatives, employers) in discussions about ways to recognize successful completion of an educational program based on college- and career-ready standards, including in those discussions the meaning of various diploma options.

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Overview-

Graduation rates and requirements for earning a regular diploma are topics of increasing interest as states focus on ensuring that their students are college and career ready when they leave school with a diploma. Federal legislation—for example, Elementary and Secondary Education Act (ESEA), Individuals with Disabilities Education Act (IDEA)—has emphasized the importance of graduation from high school along with the prevention of students dropping out from school. Numerous educational organizations have also focused on graduation with a regular or advanced diploma as the pathway to post-high school success (e.g., Achieve, 2013; Alliance for Excellent Education, 2009; Cortiella, 2013; Hall, 2007).

To ensure that states are gauging the rates at which students are graduating in a consistent way, ESEA now requires states to use a four-year adjusted cohort graduation rate (ACGR). This rate is defined as the number of students who graduate in four years with a regular high school diploma divided by the number of students who entered high school four years earlier (adjusted for transfers, émigrés, and those who died). This rate is quite different from other rates (Urban Institute, 2014), including the one-year rate that many states used in the past. For example, some states based their graduation rate on the number of students who entered grade 12 in the fall of a year and completed with a diploma in the spring of the same year.

ESEA requires that states report the four-year ACGR overall and by subgroups, including students with disabilities who have Individualized Education Programs (IEPs). Having a common measure of graduation brings consistency across states, but the calculation of the ACGR is also different from the procedure used by the Office of Special Education Programs (OSEP) to report on students with disabilities (Urban Institute, 2014). OSEP requires that states report a Leaver Rate, which for graduation with a regular diploma involves dividing the number of students with disabilities ages 14 and older earning a regular high school diploma by the number of students with disabilities ages 14 and older leaving school either by earning a diploma, a certificate, or other document, or by dropping out (adjusted for those students who had reached maximum age and those who had died). Figure 1 provides a comparative illustration of the ESEA and OSEP approaches to calculating graduation/leaver rates.

Graduation rates for students with disabilities historically have lagged behind those for students without disabilities. For example, the U.S. Department of Education (2010) estimated that the graduation rate for special education students is about 50%, compared to a national graduation rate that is about 75% (Stillwell, Sable, & Plotts, 2011). Yet, these data were based on still another calculation method—the averaged freshman graduation rate (AFGR). AFGR is used by the National Center on Education Statistics to estimate, without having individual student data, the proportion of high school freshmen who graduate with a regular diploma four years after starting ninth grade (Balfanz, Bridgeland, Bruce, & Fox, 2013).

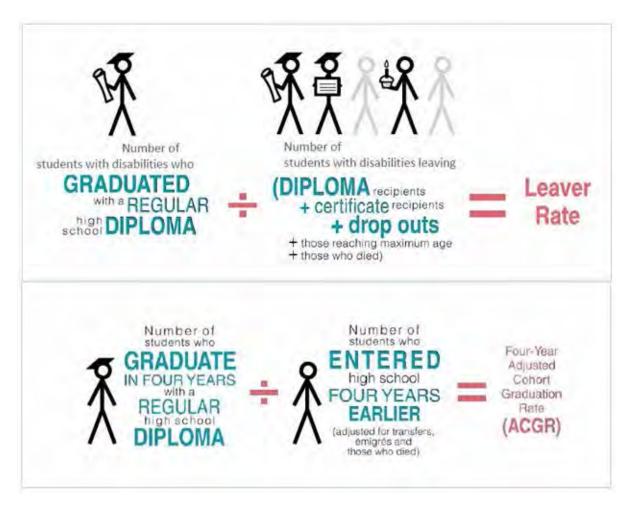


Figure 1. Illustrations of Calculations for Leaver (OSEP) and Graduation (ESEA)

Figures reprinted with permission from the National Center for Learning Disabilities. Source: Cortiella, C. (2013). *Diplomas at risk: A critical look at the graduation rate of students with learning disabilities* (pp. 9, 13). New York: National Center for Learning Disabilities.

The ACGR data, which are based on individual student data files, shed additional light on what is happening for the special education subgroup, and it has been quite sobering. For example, for the 2010-11 school year, ACGR for students with disabilities ranged from 23% (Mississippi and Nevada) to 84% (South Dakota), and gaps between all students and students with disabilities were as high as a 52-percentage point difference (Cortiella, 2013). For 2011-12, the ACGR for students with disabilities ranged from 24% (Nevada) to 81% (Montana); the gaps between all students and students with disabilities was as high as 43% in 2011-12 (Stetser & Stillwell, 2014).

Considerable attention has been given to those students with disabilities who participate in states' general assessments. Recently, attention has turned to those students who participate in states' alternate assessments based on alternate achievement standards (AA-AAS). It is less

clear whether these students are permitted to earn regular high school diplomas when they leave school, and how they might factor into the ACGR calculations.

Students with the most significant cognitive disabilities are a diverse group of students; still, they have several consistent characteristics that help in understanding their needs (Kearns, Towles-Reeves, Kleinert, Kleinert, & Thomas, 2011; Towles-Reeves et al., 2012; Towles-Reeves, Kearns, Kleinert, & Kleinert, 2009). For example, most of the students in this group (but certainly not all) have intellectual disabilities, multiple disabilities, or autism. Their numbers, relative to the general student population are small, perhaps in the range of 0.5 to 1.0% (these percentages vary considerably by state and district). Some of these students (around 15%) can read fluently, in print or braille, with basic understanding; about 50% can do basic computational procedures (with or without a calculator). Still, others have low levels of expressive communication and perhaps low levels or inconsistent levels of receptive communication.

The National Center on Educational Outcomes (NCEO) has conducted several surveys of states to learn more about diploma options, graduation requirements, and exit exams for youth with disabilities (Johnson, Thurlow, & Schuelka, 2012; Thurlow, Cormier, & Vang, 2009). Surveys can provide a picture of the ways in which students can earn a regular diploma, including the ways in which students with the most significant cognitive disabilities can earn a diploma. Still, survey data are sometimes difficult to interpret, so there is a need for the analysis of states' written policies on graduation requirements. States' written policies provide documentation of current policies and practices for students with the most significant cognitive disabilities, including whether they can earn a regular diploma. This view is particularly important to obtain because of the increasing emphasis on college and career readiness for all students, including those with the most significant cognitive disabilities (Kleinert, Kearns, Quenemoen, & Thurlow, 2013; Research and Training Center on Community Living, 2011).

The purpose of this analysis of states' graduation policies for their students with the most significant cognitive disabilities who participate in the AA-AAS was to address six questions:

- 1. To what extent do states allow students with the most significant cognitive disabilities who participate in the AA-AAS to earn a regular high school diploma?
- 2. What are the requirements for students with the most significant cognitive disabilities to earn a regular diploma in those states that do allow them to earn a regular diploma if they participate in the AA-AAS?
- 3. What end-of-school documents are available to students with the most significant cognitive disabilities who participate in the AA-AAS in states that allow them to earn a regular diploma if they do not meet the requirements for earning a regular diploma?

- 4. What are the requirements for receiving other end-of-school documents in states that allow students who participate in the AA-AAS to earn a regular diploma?
- 5. What end-of-school documents are available to students with the most significant cognitive disabilities in states that do not allow them to earn a regular diploma if they participate in the AA-AAS?
- 6. What are the requirements for students with the most significant cognitive disabilities who participate in the AA-AAS to receive other end-of-school documents when a regular diploma is not offered to them?

Method-

Three NCEO staff members searched state department of education websites for information on graduation options for students who participate in the AA-AAS. We specifically looked for information on: (a) whether students in the AA-AAS could receive a regular diploma; (b) the criteria that were identified for students to receive a regular diploma if that was an option; (c) whether alternate diplomas or certificate options were available to students with the most significant cognitive disabilities who participated in the AA-AAS; and (d) the criteria that were identified for students to receive an alternate diploma or certificate option, if available.

Following the documentation of information from states' websites, we summarized what we found, including the source websites and documents (see Appendix A). An example of a completed form for one state is provided in Appendix B. After the information was compiled, each state director of special education was sent the form for his or her state to use for verification of our findings. The verification procedure took place during a window from April 29 to June 2, 2014. Forty-one states responded to the verification request during that window. For the remaining nine states, other individuals within the state departments of education were contacted for verification. By June 30, 2014 a total of 47 verification responses had been obtained from the 50 states (94%).

During the verification process, we often received information about policies that we were not able to find on states' websites. In these and other cases, state personnel provided to us their understanding of the policy. We accepted both—written documentation and feedback from the state during the verification process.

After verification, states were first assigned to one of two groups based on whether they did or did not allow students who participated in the AA-AAS to receive a regular diploma. Next, states that allowed students in an AA-AAS to receive a regular diploma were further grouped into categories depending on the criteria that states reported using. The categories for states that allowed these students to receive a regular diploma indicated that students in AA-AAS: (a) must meet exactly the same state criteria as other students; (b) must meet exactly the same state criteria as other students, with variation for the test requirement; (c) must receive a proficient score on the AA-AAS; (d) may meet IEP-defined requirements; (e) may meet local district requirements; or (f) may meet other alternative state criteria (e.g., special course of study). To assign one criterion to each state, we prioritized the criteria on a scale from those closest to being the same as the criteria applied to students without disabilities to those farthest away. This prioritization is shown in Table 1.

Distance from Criteria for Students Without Disabilities	Criteria for Students Participating in the AA-AAS
Exactly the Same	Meet exactly the same state criteria as other students
	Meet local district requirements
	Meet exactly the same state criteria as other students, with variation for the test requirement
	Receive a proficient score on the AA-AAS
*	Meet other alternative state criteria (e.g., special course of study)
Farthest Away	Meet IEP-defined requirements

Table 1. Prioritized Criteria for Receiving a Regular Diploma

If a state appeared to fit into two or more categories, it was categorized into the criterion that was "farthest away" from the criterion used for all other students. For example, if a student needed to meet local district requirements but could also meet IEP-defined requirements, the IEP-defined requirement was considered to be less similar to what all other students needed to do, so that policy would be categorized as "Meet IEP-defined requirements."

For the states that allowed students participating in the AA-AAS to receive regular diplomas, we also identified any end-of-school documents (other than the regular diploma) that were available for those students who did not meet the regular-diploma graduation requirements. In addition we sought information on the requirements to earn any available end-of-school documents.

Policies in states that did not allow students with the most significant cognitive disabilities who participated in the AA-AAS to earn a regular diploma also were examined to identify the end-of-school documents that were available to their students. The criteria for earning these end-of-school documents also were explored.

When categorizing state policies, it was possible that we did not have all the relevant information used in making a decision about whether a criterion was met. For example, a state might indicate that a student with a significant cognitive disability needed to have 21 credits, like other students, but not indicate whether those credits could be obtained by taking special nonequivalent classes. Because we could not discern this from the state website or from the state verification of our information, the state policy was classified literally.

Results

Results are organized by the six research questions. Following the research questions, we include a section that contains additional findings that we discovered during our analyses. These additional findings focus on: (a) the nature of the curriculum for students with the most significant cognitive disabilities; (b) parent knowledge about diploma options; and (c) the implications of a different end-of-school document for accountability.

Extent to Which States Allow Students with the Most Significant Cognitive Disabilities to Earn a Regular High School Diploma (Research Question 1)

The policies of 68% of the 50 states (N = 34) indicated that the state allowed students with the most significant cognitive disabilities participating in the AA-AAS to earn a regular diploma (see Figure 2). Appendix C (see Table C-1) provides state-by-state information on whether students participating in the AA-AAS can receive a regular diploma.

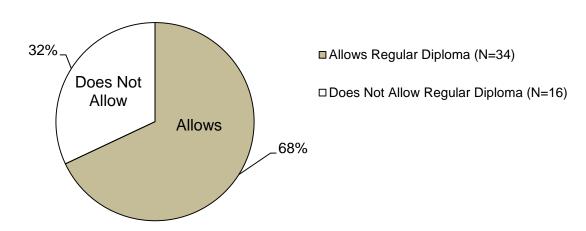


Figure 2. Percent of States that Allow and Do Not Allow Students in AA-AAS to Receive Regular Diploma

Requirements for Students with the Most Significant Cognitive Disabilities to Earn a Regular Diploma in States that Allow It (Research Question 2)

For the 34 states that allowed students with the most significant cognitive disabilities who participated in an AA-AAS to earn a regular diploma, we conducted an analysis of their categorized criteria. Figure 3 presents these criteria and the number of states whose criteria were in each category. (See Appendix C, Tables C-2 and C-3, for details.)

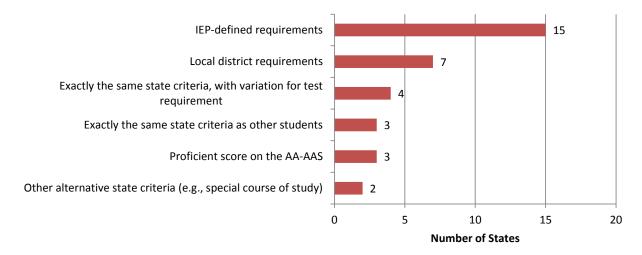


Figure 3. Criteria for Students in AA-AAS to Earn a Regular Diploma

As indicated in the figure, most states (N=15) required students to meet *IEP-defined requirements*. Some states that referred to IEP-defined requirements did so in an "or" statement. For example, Pennsylvania indicated that the student who participated in the AA-AAS must either meet regular education graduation requirements or meet criteria established by the IEP team. In other states, the IEP team could alter the course requirements. For example, Utah's policy indicated that the IEP can make course substitutions for a student to meet graduation requirements. Meeting IEP goals and objectives was a frequent approach that some states took. For example, as part of an "or" statement, Arkansas noted that students must either meet the regular graduation requirements or complete goals and objectives on the IEP.

The seven states that referred to *local district requirements* for earning a regular diploma varied from simply stating that local districts set policies for graduation requirements to indicating that districts could adapt some of the state's requirements. For example, Arizona indicated that the local school district governing board or charter school developed the course of study and graduation requirements for students in special education programs, but emphasized that these should not be different from the graduation requirements that apply to all students regardless of the state assessment in which the student participates. Colorado indicated that if alternate graduation requirements (e.g., district-determined demonstration of competency) were used for the student to earn a regular diploma, and the student met those requirements and received a regular diploma, that student would no longer be eligible to receive special education services.

Four states indicated that students participating in the AA-AAS had to meet *exactly the same state criteria* for graduation with a regular diploma as other students, except that the test requirements could be altered. In a couple of the states (Oklahoma and Washington), the state indicated that students could meet the testing criterion of the graduation requirements by taking the AA-AAS (but not necessarily having to earn a proficient score). Washington added that students receive a regular diploma with a notation of "individual achievement" on the diploma.

In both California and Illinois, students were exempted from taking the testing requirement for earning a regular diploma.

The criterion of *requiring the student to earn a proficient score on the AA-AAS* was evident in three states' policies on graduation requirements for students in the AA-AAS (Georgia, Idaho, and Massachusetts). Georgia's policy indicated that the student must earn a proficient score on all the content areas of the Georgia Alternate Assessment (GAA). Similarly, Idaho indicated that the student had to earn a proficient score on the Idaho State Achievement Test—Alternate (ISAT-ALT). Massachusetts's policy was less clear in that it indicated during verification that AA-AAS students must earn a "Needs Improvement" score level or better on the alternate **based on grade-level achievement standards**. Students who are working on grade-level achievement standards and students who are working on alternate achievement standards participate in the same portfolio assessment in Massachusetts.

Three states unequivocally indicated that there was no change in the graduation requirements for a student with the most significant cognitive disabilities. For example, Hawaii indicated simply that students must complete the required 24 credits. Mississippi indicated that students must meet the same criteria as other students. Maine's requirements for meeting the same criteria were less clear in that the criteria were those established by the district.

End-of-School Documents Available to Students with the Most Significant Cognitive Disabilities Who Do Not Meet the Regular Diploma Requirements (Research Question 3)

Of the 34 states that indicated students with the most significant cognitive disabilities who participated in an AA-AAS could earn a regular diploma, 19 states (56%) either had other state end-of-school documents for those students who did not meet the criteria for the regular diplomas, or indicated that districts might issue other end-or-school documents to these students. The names and numbers of the other end-of-school documents varied considerably (see Table 2 and Appendix D, Table D-1).

Most states that indicated there were other end-of-school documents available did not have another **state-level** end-of-school document, instead relying on districts to determine the other end-of-school documents available to students with the most significant cognitive disabilities who did not meet the requirements for earning a regular diploma. Nine states did have other state-level end-of-school documents for these students. Most of these states (N = 7) had Certificates of Completion. Other available state-level documents included Certificates, Certificates of Attendance, Occupational Diplomas, and Special Diplomas or Special Education Diplomas. Table 2. Other End-of-School Documents for Students with the Most Significant Cognitive Disabilities Not Meeting Requirements for Regular Diploma in States that Offer the Regular Diploma to Students Participating in the AA-AAS (N = 19)

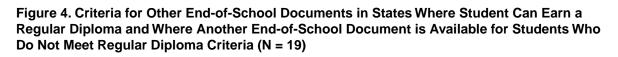
State	Other End-of-School Documents Available Name or Description ¹
Alabama	No other state document; district may issue other documents
Arizona	No other state document; district may issue other documents (e.g., Certificate of Attendance, Certificate of Completion, Certificate of Achievement)
Arkansas	No other state document; district may issue other documents (e.g., Letter of Completion, Certificate of Attendance)
California	Certificate of Completion or Attendance
Colorado	No other state document; district may issue other documents (e.g., Certificate of Completion)
Georgia	Special Education Diploma
Hawaii	Certificate of Completion
Kansas	No other state document; district may issue other documents
Maine	No other state document; district may issue other documents
Massachusetts	No other state document; district may issue other documents
Mississippi	Certificate of Completion; Occupational Diploma
Missouri	Certificate of Completion
Nebraska	No other state document; district may issue Certificate of Completion
New Hampshire	Special Diploma; Certificate of Completion; Certificate of Attendance
North Dakota	Certificate
South Dakota	No other state document; district may issue other documents
Utah	Certificate of Completion
Wisconsin	No other state document; district may issue other documents
Wyoming	Certificate of Completion

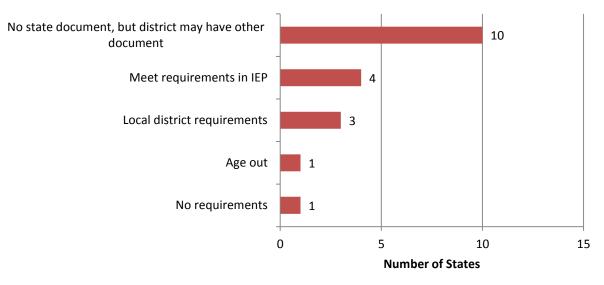
Note: Fifteen states (Connecticut, Idaho, Illinois, Iowa, Michigan, Minnesota, Montana, New Jersey, New Mexico, Ohio, Oklahoma, Pennsylvania, Texas, Vermont, and Washington) reported that there was no other end-of-school state document; they did not indicate that districts could provide one (see Appendix D, Table D-2).

¹States that have other end-of-school documents that were not identified by name on their websites or during the verification process do not include information about the document names in this table.

Requirements for Other Documents that Students May Receive in States Allowing Students to Earn a Regular Diploma (Research Question 4)

The criteria for earning other end-of-school documents also varied considerably (see Figure 4 and Appendix D, Tables D-2 and D-3). Ten states responded that there was no other state document, but that districts may decide to issue one; three other states specifically mentioned district-determined requirements. Four states indicated that the student had to meet IEP requirements. One state each noted aging out and having no requirements.





Most states indicated that there was *no state document, but district may have other documents*. In these states, the criteria were determined by the districts, and when information was available, seemed to vary widely. In some cases, the state provided the names of documents and criteria that districts were using; in others there was no information about the criteria that districts might be using.

Must meet IEP requirements was the basis for receiving other end-of-school documents in four states. These requirements sometimes involved simply meeting IEP goals, but more often seemed to be slightly more prescriptive. For example, in California, requirements added to meeting IEP goals included satisfactorily attending high school, participating in prescribed instruction, and meeting objectives of transition services.

Local district requirements had to be met in three states. The descriptions of the requirements in these states varied from simply indicating that each district determines the criteria (New Hampshire, Wyoming) to indicating that students could meet the district criteria if they had completed their senior year, were exiting the school system, and had not met all of the state or LEA requirements for a diploma.

Age-out was the criterion used in one state. Specifically, Missouri, the state in which an other end-of-school document (Certification of Completion) was based on the student's age, indicated that the Certificate of Completion would be given to students who age out at age 21.

No requirements were identified for receiving an other end-of-school document (special education diploma) in one state (Georgia).

End-of-School Documents in States that Did Not Allow Students with the Most Significant Cognitive Disabilities to Earn a Regular Diploma (Research Question 5)

In the 16 states that did not allow students with the most significant cognitive disabilities who participated in the AA-AAS to earn a regular diploma, a variety of end-of-school documents was available (see Table 3 and Appendix E, Table E-1). Certificates of Achievement were available in two states (Alaska and Louisiana), Certificates of Attendance in another two (Delaware and South Carolina), and Certificates of Completion in another two (Indiana and Maryland). The remaining states had a range of special diplomas, alternative diplomas, adjusted diplomas, and so on.

 Regular Diploma (N = 16)

 State
 Other End-of-School Documents Available Name or Description

Table 3. End-of-School Documents in States Not Allowing Students in the AA-AAS to Earn a

State	Other End-of-School Documents Available Name or Description
Alaska	Certificate of Achievement
Delaware	Certificate of Attendance
Florida	Special Diploma Option 1, Special Diploma Option 2
Indiana	Certificate of Completion or similar document from district
Kentucky	Alternative High School Diploma
Louisiana	Certificate of Achievement
Maryland	Certificate of Program Completion
Nevada	Adjusted Diploma
New York	Skills and Achievement Commencement Credential
North Carolina	Graduation Certificate
Oregon	Modified Diploma, Extended Diploma, or Alternative Certificate
Rhode Island	None
South Carolina	Certificate of Attendance from district
Tennessee	Special Education Certificate
Virginia	Special Diploma
West Virginia	Modified Diploma

Requirements for Other Documents that Students May Receive in States that Did Not Allow a Regular Diploma (Research Question 6)

Among the 16 states that did not allow students participating in an AA-AAS to earn a regular diploma, 15 offered other graduation options with separate criteria, such as meeting IEP requirements, taking an AA-AAS, or attendance (see Figure 5 and Appendix E, Tables E-2 and E-3). A small number of states mentioned district determined requirements and an alternative course of study. Just one state (Rhode Island) in this group indicated that no other documents were available to students who participated in an AA-AAS.

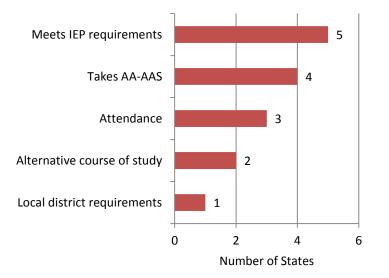


Figure 5. Criteria for Other Documents in States that Did Not Allow a Regular Diploma

Meets IEP requirements often involved meeting IEP requirements along with meeting other criteria. For example, in North Carolina (Graduation Certificate), students have to successfully complete 21 course credits in high school as well as "pass" all requirements of their IEPs. Tennessee indicated that the Special Education Certificate is awarded to students who satisfactorily completed an IEP and a portfolio, and who have satisfactory records of attendance and conduct.

In four states, *taking the AA-AAS* was the criterion for receiving another end-of-school document. For example, Louisiana simply indicated that its Certificate of Achievement is for students who take the Louisiana Alternate Assessment Level 1 (LAA1). Maryland indicated that the Certificate of Program Completion was available only to those students who, once they started to take the alternate assessment, took it for the duration of their schooling.

The states that indicated *attendance* was the requirement for earning an end-of-school document did not have additional criteria. Two of these states had Certificates of Attendance (Delaware and South Carolina) and one had a Certificate of Achievement (Alaska).

Other Information About Graduation Requirements for Students with the Most Significant Cognitive Disabilities Who Participate in the AA-AAS

Although we did not specifically look for information about the nature of the curriculum for students with the most significant cognitive disabilities, parent knowledge about diploma options, or the implications of a different end-of-school document for accountability, some of this information did emerge in either our web search or during the state verification process. Although not comprehensive, we highlight the information that did emerge in these three areas. This information was **not** verified by other states.

Nature of curriculum. Five states made some mention of functional performance or functional curriculum in criteria for students with the most significant cognitive disabilities who participated in the AA-AAS to graduate. Of these, four states mentioned it in the context of earning a regular diploma (Michigan, New Mexico, North Dakota, and South Dakota). New York mentioned it in the context of earning a separate credential. The specific language for each state is provided in Appendix F (see Table F-1).

Parent knowledge about diploma options. Six states clearly mentioned parent knowledge of a diploma option either as a sign off on a form, having input, or being notified. Both Maryland and Rhode Island mentioned parent sign off or notification that a decision for AA-AAS participation did not lead to a regular diploma. Three states required parent notification about changing requirements or altering curriculum in order to earn a regular diploma (Montana, Ohio, and Oklahoma). Ohio and Oklahoma required this consent in writing. One state, Oregon, required parent consent for students participating in requirements toward earning an extended diploma. See Appendix F (Table F-2) for more detailed information on each state's policy.

Implications for accountability. Three states addressed whether regular diplomas earned by students participating in an AA-AAS count as a regular diploma for accountability reporting purposes. New York did not allow a regular diploma for students in AA-AAS and did not count a skills and achievement commencement credential for accountability purposes. Two other states, Utah and Wisconsin, allowed students in the AA-AAS to earn a regular diploma; Utah did not count it for accountability. Wisconsin allowed it to be counted for accountability if the district board policy permitted it. See Appendix F (Table F-3) for the language for each state's policy.

Discussion

This investigation of the graduation requirements and diploma options for students with the most significant cognitive disabilities who participate in states' AA-AAS revealed considerable variability in approaches. Although nearly 70% of states indicated that students with the most significant cognitive disabilities who participate in the AA-AAS can receive a regular diploma, the criteria used in those states are extremely varied, from those that have the exact same requirements of these students as of all other students, either with or without the same requirements for testing (N = 7) to those that allow the IEP team to set the criteria (N = 15). In those states in which students with the most significant cognitive disabilities who participate in the AA-AAS cannot receive a regular diploma, only one state indicated that there was no other end-of-school document available to these students. Most states had one or more other end-of-school documents (e.g., Certificates of Achievement or Attendance, Special Diplomas), and these were generally the same types of end-of-school documents available to students with the

most significant cognitive disabilities in those states that allowed students to receive a regular diploma.

Gathering the information on whether students with the most significant cognitive disabilities who participate in the AA-AAS could receive a regular diploma was a difficult task. The information is not easily found on states' websites. Verification was used to confirm what was found or to provide information where none was found. Despite the difficulty in finding information, it was clear from the quick response of nearly all states to our requests for verification of information that states were very interested in the topic.

In addition to the information being difficult to find, we often found that the information that did exist was not always very easy to interpret. One state indicated that students participating in the AA-AAS could receive a regular diploma, but to do so had to meet grade-level achievement standards. Another state seemed to indicate both that students had to meet exactly the same criteria as other students, but also indicated that districts set the criteria, making it difficult to discern whether districts actually could change the criteria.

Our categorization of criteria in terms of their distance from the criteria used for students without disabilities also was difficult. Although we developed a reasonable ordered list, there are several factors that might make the order questionable in specific cases. For example, if a state had developed alternate achievement standards that were not based on rigorous performance requirements, it might be reasonable to order "Receive a proficient score on the AA-AAS" after "Meet other alternative state criteria (e.g., special course of study"), thus indicating that it was farther away from the criteria used for students without disabilities. Regardless of this, the categories that were used in our analysis provide a reasonable set of categories to use in describing states' policies.

We also found that in some states, despite a stated policy, there was clearly an interpretation that differed from that policy. For example, more that one of the states that indicated students with the most significant cognitive disabilities who participated in the AA-AAS could receive a regular diploma also noted that this rarely happened, suggesting that policy differed from actual practice because of the difficulty of meeting the requirements, or perhaps that placement in the AA-AAS itself produced some unintended consequences, namely that students did not gain access to the general curriculum necessary to be able to meet the requirements.

In our search, we also found one state that noted that the student with the most significant cognitive disabilities who participated in the AA-AAS would have a notation of "individual achievement" on the diploma. Because this type of occurrence was not a target of our search, we do not know whether similar notations were noted in other states, either on the diploma or elsewhere (e.g., on a transcript; see Thurlow et al., 2009).

Both of the difficulties just mentioned (difficulty gathering information and difficulty interpreting information that was found) suggest that it would be very difficult, if not impossible, for most parents to figure out the requirements for their own child. Similarly, it is likely very difficult for educators to determine exactly what the criteria are for their students with the most significant cognitive disabilities.

In our web searches, we also found that in most states minimal information was provided on the implications of states' policies about whether parents of a student with the most significant cognitive disabilities were notified that participation in the AA-AAS would make their child ineligible for earning a regular diploma. There also was minimal information on whether a student participating in the AA-AAS who might earn a regular diploma would then be counted as a graduate in graduation rate accountability formulas. Implications for the curriculum or for accountability were generally lacking. It should be noted that we were not specifically seeking this information in our searches, nor during verification, but it was evident in some of the information that we found, suggesting that it possibly should be available in all states.

Thurlow and Johnson (2013) recommended that states take the following steps in addressing the graduation requirements for students with the most significant cognitive disabilities:

First and foremost, policies are needed to ensure that students with significant cognitive disabilities are in classes that promote high expectations and are based on the CCSS/college- and career-ready standards. Currently, too many students with significant cognitive disabilities are tracked from their earliest years, resulting in lack of exposure to the content needed to interact with their peers and to gain the skills needed for successful postsecondary experiences and successful competitive employment.

Second, policymakers should take steps to involve stakeholders in discussions about ways to recognize successful completion of an educational program based on the CCSS/college- and career-ready standards. Included in these discussions should be educators, parents, postsecondary education programs and employers. Serious discussions about the meaning of various diploma options under consideration must take place. (p. 12)

Although many states have already established their policies, at this time when college and career readiness is a priority, it is well worth taking the time to engage again in considerations about the meaning of the regular diploma and its meaning for students with the most significant cognitive disabilities.

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Appendix A

State Documents Used in Analysis of Accommodation Policies

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State	Documents
Virginia	 (n.d.) 2013-2014 Frequently asked questions, Virginia Alternate Assessment Program. Retrieved January 14, 2014 from: http://www.doe.virginia.gov/testing/alternative_assessments/vaap_va_alt_assessment_prog/vaap_faqs.pdf (n.d.) Graduation requirements: Other diplomas & certificates. Retrieved January 14, 2014 from http://www.doe.virginia.gov/instruction/graduation/other_diploma. shtml [1/14/2014]
Washington	 (n.d.) Washington Alternate Assessment System (WAAS). Retrieved January 14, 2014 from: http://www.k12.wa.us/assessment/AlternativeAssessment/default. aspx (n.d.) Washington Alternate Assessment System (WAAS): WAAS-DAPE. Retrieved January 14, 2014 from: http://www.k12.wa.us/Assessment/AlternativeAssessment/WAAS-DAPE.aspx (n.d.) Washington Alternate Assessment System (WAAS): Awareness level waiver. Retrieved January 14, 2014 from: http://www.k12.wa.us/Assessment/Alternative-Assessment/AwarenessLevel.aspx (2013, November) Graduation in Washington: A toolkit for schools and families to help ensure students earn high school diplomas. http://www.k12.wa.us/graduationrequirements/pubdocs/graduationtoolkit.pdf (2013, September) How Students in Special Education Participate in State Testing. http://www.k12.wa.us/resources/pubdocs/specialedtesting.pdf.
West Virginia	 (n.d.) The West Virginia Alternate Performance Task Assessment (APTA) is specifically designed for students with significant cognitive disabilities whose performance cannot be adequately assessed through the general assessment instrument, West Virginia Educational Standards Test 2 (WESTEST 2), even with accommodations. Retrieved January 14, 2014 from: http://wvde.state.wv.us/oaa/APTA/ (2011, January) Exceptional news brief: Assessment and diploma decisions (draft document). http://wvde.state.wv.us/institutional/SpecialEd/Assessment-Diploma%20Decisions.docx.
Wisconsin	(2010, October) Information update bulletin 10.08. http://sped.dpi.wi.gov/sped_bul10- 08
Wyoming	(2013, May) Wyoming Department of Education Chapter 31. Graduation Require- ments http://soswy.state.wy.us/Rules/RULES/5218.pdf.

Note: All state documents were taken from state department of education websites.

Appendix B=

Example State Profile of One State

Verification of Graduation Options for Students in AA-AAS

Please review the following information for your state regarding graduation options for students in AA-AAS, and edit the content for accuracy.

Summary of Graduation Options Available to Students in AA-AAS

- 1. Can students in AA-AAS receive a Regular Diploma? No
- 2. If Yes, what criteria is used? Not applicable
- If students do not meet requirements for regular diploma what do they receive? Occupational Diploma
- 4. What criteria are used for that option?
 - Coursework in alternate achievement standards
 - IEP team decision

Source(s) of Information NCEO Used

Alabama Department of Education (2014). AHSG requirements LEA questions revised 6-10-13. Retrieved January 8, 2014 from: http://www.alsde.edu/general/New_Diploma_FAQs_Revised_6-6-13.doc

For some students in the AA-AAS, they are working toward the Occupational Diploma. New diploma policy was introduced for 9th grade class of 2013-14.Updated text is below from FAQs.

"What is the purpose in making this change?

 The purpose for the change is to allow more flexibility for students in pursuing their interests. There are many differences in the courses students may take with this diploma; everyone will not take the same courses just because there is one diploma. Also, LEAs may add requirements for additional diplomas.

33. Will the students on certificates be involved in this or will this be an IEP Team's decision for those students with cognitive deficits?

• Yes, Alternate Achievement Standards courses for these students will count toward the required credits for graduation.

47. Will the Alternate Achievement Standards (AAS) Life Skills be the Career Preparedness equivalent?

Yes. AAA Life Skills offers school systems flexibility to utilize curriculum and instructional programs that address the three components of the Career Preparedness course."

Appendix C

States Allowing Students with the Most Significant Cognitive Disabilities Who Participate in the AA-AAS to Receive a Regular Diploma and the Criteria for Receiving the Diploma

Table C-1. States That Allow and Do Not Allow Students Participating in the AA-AAS to Receive
a Regular Diploma

State	Yes, may receive diploma	No, may not receive diploma
Alabama	Х	
Alaska		X
Arizona	Х	
Arkansas	Х	
California	X	
Colorado	Х	
Connecticut	Х	
Delaware		Х
Florida		Х
Georgia	Х	
Hawaii	Х	
Idaho	Х	
Illinois	Х	
Indiana		X
Iowa	Х	
Kansas	Х	
Kentucky		Х
Louisiana		Х
Maine	X	
Maryland		Х
Massachusetts	Х	
Michigan	X	
Minnesota	Х	
Mississippi	X	
Missouri	X	
Montana	Х	
Nebraska	Х	
Nevada		Х
New Hampshire	X	
New Jersey	X	

State	Yes, may receive diploma	No, may not receive diploma		
New Mexico	X			
New York		X		
North Carolina		X		
North Dakota	X			
Ohio	X			
Oklahoma	X			
Oregon		X		
Pennsylvania	X			
Rhode Island		X		
South Carolina		X		
South Dakota	X			
Tennessee		X		
Texas	X			
Utah	X			
Vermont	X			
Virginia		X		
Washington	X			
West Virginia		Х		
Wisconsin	X			
Wyoming	X			
Total	34	16		

Table C-1. States That Allow and Do Not Allow Students Participating in the AA-AAS to Receive a Regular Diploma (continued)

Table C-2. Criteria Used for Students Participating in AA-AAS to Earn a Regular Diploma

State	Exactly same state criteria as other students	Exactly same state criteria, with variation for test requirement	Receive a proficient score on AA-AAS	IEP-defined requirements	May meet local district requirements	Other alternative criteria
Alabama						X
Arizona					Х	
Arkansas				Х		
California		Х				
Colorado					Х	
Connecticut					Х	

Table C-2. Criteria Used for Students Participating in AA-AAS to Earn a Regular Diploma (continued)

State	Exactly same state criteria as other students	Exactly same state criteria, with variation for test requirement	Receive a proficient score on AA-AAS	IEP-defined requirements	May meet local district requirements	Other alternative criteria
Georgia			Х			
Hawaii	Х					
Idaho			Х			
Illinois		X				
lowa				Х		
Kansas					Х	
Maine	Х					
Massachusetts			Х			
Michigan				Х		
Minnesota				Х		
Mississippi	Х					
Missouri				Х		
Montana				Х		
Nebraska				Х		
New Hamp- shire					Х	
New Jersey				Х		
New Mexico				Х		
North Dakota						Х
Ohio				Х		
Oklahoma		Х				
Pennsylvania				Х		
South Dakota				Х		
Texas				Х		
Utah				Х		
Vermont				Х		
Washington		Х				
Wisconsin					Х	
Wyoming					Х	
Total 34	3	4	3	15	7	2

State	State Responses and Policy Language			
Alabama	May meet other alternative criteria (e.g., special course of study): student follows extended course of study			
Arizona	May meet local district requirements: local school district governing board or charter school develops course of study and graduation requirements for students in special education programs			
Arkansas	May meet IEP-defined criteria: either by meeting regular graduation requirements, or by completing goals and objectives on IEP			
California	Must meet exactly the same state criteria as other students, with variation for test requirement: must satisfy state and local graduation requirements, but can be exempted from the CAHSEE			
Colorado	May meet local district requirements: districts can adapt demonstrations of competency (State notes that eligibility for special education services ends when graduates with a diploma.)			
Connecticut	May meet local district requirements: individual districts can provide alternative meth- ods of diploma issuance			
Georgia	Must receive a proficient score on the AA-AAS: must earn proficient score on all content areas of GAA			
Hawaii	Exactly same criteria as other students: must complete the required 24 credits			
Idaho	Must receive a proficient score on the AA-AAS: must earn proficient score on ISAT- ALT; also has alternate mechanism/plan, which includes an IEP that outlines alternate requirements for graduation			
Illinois	Must meet exactly the same criteria as other students, with variation for test requirement: complete all high school requirements, but can be exempt from Prairie State Achievement Examination			
Iowa	May meet IEP-defined criteria: complete course of study outlined in IEP			
Kansas	May meet local district requirements: local decision			
Maine	Exactly same criteria as other students: must meet district requirements (no indication that they can be changed) (unclear)			
Massachusetts	Must receive a proficient score on the AA-AAS: must earn Needs Improvement or better on alternate based on grade-level achievement standards (unclear)			
Michigan	May meet IEP-defined criteria: must meet Michigan Merit Curriculum, but may do so via a personal curriculum which can be used to modify any curriculum. Decisions related to student's educational program are made through the IEP process by the IEP Team.			
Minnesota	May meet IEP-defined criteria: student must meet or exceed the reading and mathematics alternate achievement standards on MTAS; if student does not, IEP team may determine that an individual passing score is appropriate			
Mississippi	Exactly same criteria as other students: must meet same criteria as other students			
Missouri	May meet IEP-defined criteria: must meet district graduation requirements or meet goals of IEP and IEP team determines students is ready to graduate			
Montana	May meet IEP-defined criteria: meet regular graduation requirements or meet IEP goals determined by the IEP team			
Nebraska	May meet IEP-defined criteria: IEP may prescribe a course of instruction that leads to a regular diploma			

State	State Responses and Policy Language			
New Hampshire	May meet local district requirements: requirements for regular diploma and special diploma are set by local school board			
New Jersey	May meet IEP-defined criteria: IEP team determines state and local graduation requirement (which may include not having to pass the High School Proficiency Assessment – the Alternate Proficiency Assessment is not to be used as a graduation test requirement) – state says there must be a statement about the rationale for exemption or modification of requirements and a description of the alternate proficiencies to be achieved to earn a state-endorsed diploma			
New Mexico	May meet IEP-defined criteria: student must meet IEP-team defined cut score on alternate portfolio as well as take the standard or alternate courses defined by the IEP team			
North Dakota	May meet other alternative criteria (e.g., special course of study): must meet state required minimum number of credits, which may be achieved through a state-approved functional curriculum.			
Ohio	May meet IEP-defined criteria: complex set of pathways for students in different grades in different years. Pathway 4 is only for AA-AAS students. Students must successfully complete the standards-based IEP as determined by IEP team (with specific guidelines)			
Oklahoma	Must meet exactly the same state criteria as other students, with variation for test requirement: must meet state minimum graduation requirements either through college preparatory/work ready curriculum or core curriculum standards, which include demonstration of mastery via alternate assessments			
Pennsylvania	May meet IEP-defined criteria: either meet regular education graduation requirements or meet criteria established by the IEP team			
South Dakota	May meet IEP-defined criteria: must meet SD graduation requirements, but IEP team can determine what complete the graduation requirements are for a student with disabilities (notes that parents must be aware of different requirements and that services end on receipt of regular diploma)			
Texas	May meet IEP-defined criteria: ARD committee makes decisions on modification of content and meeting assessment passing standards for students with disabilities			
Utah	May meet IEP-defined criteria: IEP team can make course substitution for student to meet graduation requirements			
Vermont	May meet IEP-defined criteria: IEP team can develop an Alternative Credit Accrual Plan for students with disabilities; superintendent is responsible for okaying			
Washington	Must meet exactly the same state criteria as other students, with variation for test requirement: must meet several requirements, including meeting exit exam requirements for AA-AAS (notes that student receives regular diploma, with the "distinction of Certificate of Individual Achievement, which indicates met standard on assessment designed for students with disabilities)			
Wisconsin	May meet local district criteria: determined by district policy, with possibility of three types of regular diplomas (traditional, basic, alternative)			
Wyoming	May meet local district criteria: dictated by districts as to whether students working to- ward alternate standards meet graduation requirements; very rare that AA-AAS student earns regular diploma			

Appendix D

End-of-School Documents Available to Students Who Do Not Meet Regular Diploma Criteria (in States that Allow Students Participating in the AA-AAS to Receive a Regular Diploma) (N = 34)

_	Number of Other State End-of-School	
State	Documents	Names of Other State End-of-School Documents
Alabama	0	[district]
Arizona	0	[district – e.g., certificate of attendance; certificate of comple- tion; certificate of achievement]
Arkansas	0	[district – e.g., letter of completion; certificate of attendance]
California	2	Certificate of Completion; Certificate of Attendance
Colorado	0	[district – e.g., Certificate of Completion]
Connecticut	0	
Georgia	1	Special Education Diploma
Hawaii	1	Certificate of Completion
Idaho	0	
Illinois	0	
Iowa	0	
Kansas	0	[district]
Maine	0	[district]
Massachusetts	0	[district]
Michigan	0	
Minnesota	0	
Mississippi	2	Certificate of Completion; Occupational Diploma
Missouri	1	Certificate of Completion
Montana	0	
Nebraska	0	[district – Certificate of Completion]
New Hampshire	3	Special Diploma; Certificate of Completion; Certificate of Attendance
New Jersey	0	
New Mexico	0	
North Dakota	1	Certificate
Ohio	0	
Oklahoma	0	

State	Number of Other State End-of-School Documents	Names of Other State End-of-School Documents
Pennsylvania	0	
South Dakota	0	[district]
Texas	0	
Utah	1	Certificate of Completion
Vermont	0	
Washington	0	
Wisconsin	0	[district]
Wyoming	1	Certificate of Completion

Table D-1. Other End-of-School Documents in States that Allow a Regular Diploma (continued)

Table D-2. Criteria for Other End-of-School Documents that Students Participating in the AA-AAS May Earn, in States that Allow a Regular Diploma

State	No other state document	No state document, but district may issue	District determines criteria	Age out	Meet requirements in IEP	No requirements
Alabama		Х				
Arizona		Х				
Arkansas		Х				
California					Х	
Colorado		Х				
Connecticut	Х					
Georgia					Х	
Hawaii						Х
Idaho	Х					
Illinois	Х					
lowa	Х					
Kansas		Х				
Maine		Х				
Massachusetts		Х				
Michigan	Х					
Minnesota	Х					
Mississippi					Х	
Missouri				Х		
Montana	Х					

Table D-2. Criteria for Other End-of-School Documents that Students Participating in the AA-AAS May Earn, in States that Allow a Regular Diploma (continued)

State	No other state document	No state document, but district may issue	District determines criteria	Age out	Meet requirements in IEP	No requirements
Nebraska		X				
New Hampshire			X			
New Jersey	Х					
New Mexico	Х					
North Dakota					Х	
Ohio	Х					
Oklahoma	Х					
Pennsylvania	Х					
South Dakota		X				
Texas	Х					
Utah			Х			
Vermont	Х					
Washington	Х					
Wisconsin		Х				
Wyoming			Х			
Total 34	15	10	3	1	4	1

Table D-3. State Responses and Policy Language

State	State Responses and Policy Language
Alabama	No state document, but district may issue: state has one exit document, but district may issue different type of document
Arizona	No state document, but district may issue: state has no alternative documents, but some districts have opted to create a "certificate of attendance," certificate of completion," or certificate of achievement." These students have a right to continue their education.
Arkansas	No state document, but district may issue: district determines; may receive a letter of completion or a certificate of attendance
California	Meet requirements in IEP: Certificate of Completion or Attendance – students must complete a prescribed alternative course of study approved by the governing board of the school district, and must have satisfactorily met IEP goals and objectives, and must have satisfactorily attended high school, participated in the instruction as prescribed in his or her IEP, and met the objectives of the statement of transition services.

State	State Responses and Policy Language			
Colorado	No state document, but district may issue: Certificate of Completion, or other dist document – student has reached maximum age without meeting requirements for re lar diploma			
Connecticut	No other state document			
Georgia	Meet requirements in IEP: Special Education Diploma – awarded to students with disabilities assigned to a special education program who have not met the state assessment requirements or who have not completed all of the requirements for a high school diploma but have nevertheless completed their IEP. Students may get a certificate if they do not meet the requirements of their IEP.			
Hawaii	No requirement given: Certificate of Completion.			
Idaho	No other state document			
Illinois	No other state document			
Iowa	No other state document			
Kansas	No state document, but district may issue: local decision			
Maine	No state document, but district may issue: local policy			
Massachusetts	No state document, but district may issue: depends on local school district's poli- cies; no state-level acknowledgment			
Michigan	No other state document			
Minnesota	No other state document			
Mississippi	Meet requirements in IEP: Certificate of Completion or Mississippi Occupational Diploma – state requirements about taking courses agreed on by IEP committee, completing an occupational diploma portfolio, and documenting a minimum of 540 hours of successful, paid employment; Certificate of Completion: special requirements determined by the board			
Missouri	Age out: Certificate of Completion – students who age out at age 21 would get a certificate of completion in most cases			
Montana	No other state document			
Nebraska	No state document, but district may issue: no state document, but district may issue a certificate of completion			

State	State Responses and Policy Language					
New Hampshire	District determines criteria: Special Diploma, Certificate of Completion, Certificate of Attendance – requirements set by district					
New Jersey	No other state document					
New Mexico	No other state document					
North Dakota	Meet requirements in IEP: Certificate – student has accomplished goals as set forth in the Secondary Transition IEP plan					
Ohio	No other state document					
Oklahoma	No other state document					
Pennsylvania	No other state document					
South Dakota	No state document, but district may issue: no other state option available, but district can determine whether to have other options and what the criteria for those are notes that the district can create an alternative certificate of attainment or certificate of attendance and present it at graduation ceremony, but the district's obligation to continue to provide services to student does not end until the end of the fiscal year in whice the student turns 21. The certificate can also be awarded to students who age out of the program if they have not met the graduation requirements					
Texas	No other state document					
Utah	District determines criteria: Certificate of Completion – district-established criteria fo students who have completed their senior year, are exiting the school system, and hav not met all state or LEA requirements for a diploma					
Vermont	No other state document					
Washington	No other state document					
Wisconsin	No state document, but district may issue: local school board policy decision					
Wyoming	District determines criteria: Certificate of Completion – not standardized in WY – each district determines eligibility requirements for earning a Certificate					

Appendix E

End-of-School Documents Available to Students in States That Do Not Allow Students Participating in the AA-AAS to Receive a Regular Diploma (N = 16)

State	Number of Other State End-of-School Documents	Names of Other State End-of-School Documents
Alaska	1	Certificate of Achievement
Delaware	1	Certificate of Attendance
Florida	2 ¹	Special Diploma Option 1; Special Diploma Option 2
Indiana	1	Certificate of Completion
Kentucky	1	Alternative High School Diploma
Louisiana	1	Certificate of Achievement
Maryland	1	Certificate of Program Completion
Nevada	1	Adjusted Diploma
New York	1	Skills and Achievement Commencement Credential
North Carolina	1	Graduation Certificate
Oregon	3 ¹	Modified Diploma; Extended Diploma; Alternative Certificate
Rhode Island	0	
South Carolina	1	Certificate of Attendance
Tennessee	1	Special Education Certificate
Virginia	1	Special Diploma
West Virginia	1	Modified Diploma
Total 16	18	

Table E-1. Other	End-of-School Document	ts in States that Do Not	Allow a Regular Diploma

¹State has more than one state end-of-school document that fits within one criterion in Table E-2.

State	District determined criteria	Attendance	Takes alternate assessment based on AAS	Meets IEP requirements	Alternative course of study	No other documents available
Alaska		Х				
Delaware		Х				
Florida					Х	
Indiana	Х					
Kentucky					Х	
Louisiana			Х			
Maryland			Х			
Nevada				Х		
New York			Х			
North Carolina				Х		
Oregon			Х			
Rhode Island						X
South Caro- lina		Х				
Tennessee				Х		
Virginia				Х		
West Virginia				Х		
Total 16	1	3	4	5	2	1

Table E-2. Criteria for Other Documents in States that Did Not Allow a Regular Diploma

Table E-3. State Responses and Policy Language

State	State Responses and Policy Language			
Alaska	Attendance: Certificate of Achievement – based on attendance			
Delaware	Attendance: Certificate of Attendance			
Florida	Alternative course of study: Special Diploma Option 1 – must meet district require- ments (minimum number of course credits); Special Diploma Option 2 – must fulfill in- dividually designed graduation training plan, which includes annual goals or short-term objectives or benchmarks related to employment and community competencies; must show mastery of competencies in employment and community competencies train- ing plan; this option is NOT available to students who have been identified as visually impaired or speech impaired, unless they also have another identified disability.			

Table E-3. State Responses a	nd Policy Language (continued)

State	State Responses and Policy Language
Indiana	District determined requirements: Certificate of Completion (or similar document designated by the district)
Kentucky	Alternative course of study: Alternative High School Diploma – completes alternative course of study
Louisiana	Takes alternate assessment based on AAS: Certificate of Achievement – takes LAA1
Maryland	Takes alternate assessment based on AAS: Certificate of Program Completion – student remains in Alt-MSA for duration of schooling
Nevada	Meets IEP requirements: Adjusted Diploma – satisfy requirements in IEPs
New York	Takes alternate assessment based on AAS: Skills and Achievement Commencement Credential – with specific requirements, including only for students instructed and assessed on alternate performance level, can only be awarded after at least 12 years of school excluding K, credential is NOT considered a regular diploma, credential must be similar in form to diplomas, credential must be issued with a student exit summary of academic achievement and functional performance, if student is less than 21 can still attend public schools without payment of tuition
North Carolina	Meets IEP requirements: Graduation Certificate – successfully complete 21 course credits in high school, and pass all requirements of IEP
Oregon	Takes alternate assessment based on AAS: Modified Diploma, Extended Diploma, or Alternative Certificate – These diplomas are awarded only to students who have demonstrated the inability to meet the full set of academic content standards even with reasonable modifications and accommodations; Extended diploma awarded only to students who have demonstrated the inability to meet the full set of academic content standards even with reasonable modifications and accommodations and accommodations and who have a documented history of a medical condition that creates a barrier to achievement, and participate in an alternate assessment or have a serious illness or injury that changes the student's ability to participate in grade-level activities.
Rhode Island	No other documents available: notes that the students in RIAA does not earn a diploma but may participate in graduation ceremonies. Also, there is an IEP Team Assurance of Parental Notification, which requires the IEP team to inform parents of the implications of their child's participation in the RIAA, including 2. "Beginning with the 2014 graduating class, the RIAA cannot be used to meet the state assessment requirement for receiving a diploma since the RIAA is based on alternate grade level and grade span expectations."
South Carolina	Attendance: Certificate of Attendance (conveyed by district)
Tennessee	Meets IEP requirements: Special Education Certificate – awarded to students with disabilities who have (1) satisfactorily completed an IEP, (2) successfully completed a portfolio, and (3) have satisfactory records of attendance and conduct.
	43

Table E-3. State Responses and Policy Language (continued)

State	State Responses and Policy Language
Virginia	Meets IEP requirements: Special Diploma – available to students with disabilities who complete the requirements of their IEP and who do not meet the requirements for other diplomas (General Achievement Diploma – for students 18 or older who meet Board of Education criteria; GED – for students who complete prescribed programs of studies defined by local school board but who do not qualify for diplomas)
West Virginia	Meets IEP requirements: Modified1 Diploma – IEP team decision to work toward AAAs and the student meets these IEP objectives prior to graduation

Appendix F

Additional Findings About Graduation Requirements for Students Who Participate in States' AA-AAS

State	State Responses and Policy Language
Michigan	2. Q: If a student is cognitively impaired and was not able to take the MEAP/HST or the new Michigan Merit Exam, is the student still required to complete the Michigan Merit Curriculum to earn a high school diploma? A: Yes. The student must do so either through the general curriculum or the "personal curriculum" defined in the law. The decisions related to a student's educational program should be discussed and determined within the student's Individual Education Program (IEP) process by the IEP Team. A decision to assess the student with the MEAP or MI-Access tests should be a subject of considerable discussion during these meetings and conclusions based on multiple factors (present level of academic achievement and functional performance, the student's stated post school outcomes or desires, student performance on standardized, normative, criterion referenced, summative, formative or curriculum based assessments, etc.).
New Mexico	A student must meet the cut score, determined by IEP team, on alternate portfolio to demonstrate competency. Other listed graduation criteria under "Ability" option: Students must participate in Statewide College and Career Readiness Assessment System and District Short Cycle Assessment. The IEP team determines the standard or alternate courses that will make up the student's program of study. Earn the minimum number of credits required by the district for graduation or be provided equivalent educational opportunities required by the district or charter. Meet all other graduation requirements established by the IEP team. IEP goals and functional curriculum must be based on the State's content standards with benchmarks and performance standards or the Expanded Grade Band Expectations.
New York	5. The credential must be issued together with a summary of the student's academic achievement and functional performance (Student Exit Summary – see State Developed Model Form Attachment 2) and must include documentation of the student's: achievement against the Career Development and Occupational Studies (CDOS) learning standards http://www.p12.nysed.gov/cte/cdlearn/; level of academic achievement and independence as measured by NYSAA; skills, strengths, interests; and as appropriate, other achievements and accomplishments.
North Dakota	Students must earn the state required minimum number of credits for a regular diploma. Credit for Core content courses maybe achieved through a state approved functional curriculum.

Table F-1. States that Mentioned Nature of Curriculum

Table F-1. States that Mentioned Nature of Curriculum (continued)

State	State Responses and Policy Language
South Dakota	Graduation from high school with a regular high school diploma constitutes a change in placement requiring written prior notice in accordance with this article. The instructional program shall be specified on the individual educational program. The individual educational program shall state specifically how the student in need of special education or special education and related services will satisfy the district's graduation requirements. The IEP team may modify the specific units of credit described in § 24:43:11:02. Parents must be informed through the individual educational program process at least one year in advance of the intent to graduate their child upon completion of the individual educational program and to terminate services by graduation. For a student whose eligibility for a free appropriate public education, a school district shall provide the student with a summary of the student's academic achievement and functional performance, which shall include recommendations on how to assist the student in meeting the student's postsecondary goals.

Table F-2. States That Mentioned Parent Knowledge About Diploma Options

State	State Responses and Policy Language
Maryland	 Parent Understanding: I have been informed that if my child is determined eligible to participate in the Alt-MSA through the IEP Team Decision-Making Process my child will be: 1. Progressing toward obtaining a Maryland Certificate of Program Completion. If my child continues to participate in the Alt-MSA, he/she may not be eligible to obtain a Maryland High School Diploma. His/her continued participation in the Alt-MSA will not prepare him/her to meet the high school diploma requirements (Parent/Guard-ian Initials) 2. The decision for my child to participate in the Alt-MSA must be made annually (Parent/Guardian Initials)
Montana	15. May requirements for granting a diploma be waived for students with disabilities? Each school district shall provide for a waiver of the district established learner outcomes in order to accommodate the needs of special education students. Learner outcomes that are waived must be identified on the student's IEP. The school district is permitted to waive specific course requirements based on individual student needs and perfor- mance levels. Waiver requests shall be considered with respect to age, maturity, interest, and aspirations of the student and shall be in consultation with the student's parents or guardians. The IEP team must follow local district policy when considering waivers for students with disabilities.

 Table F-2. States That Mentioned Parent Knowledge About Diploma Options (continued)

State	State Responses and Policy Language
Ohio	 The third pathway to graduation is for the student with a disability who enters ninth grade on or after July 1, 2010, and before July 1, 2014 to: complete two years of high school as determined by the school; Sign and file a written statement, as stipulated by the school, which provides consent from both the student and the student's parent, guardian or custodian that allows the student to complete a curriculum other than the Ohio Core Curriculum. (Parent and student signature on the IEP meets the requirement of the Opt-Out consent.) Students with disabilities with an IEP are exempt from the consequence of being ineligible to enrol in most state universities in Ohio without further coursework as a result of Opting-Out; and complete an individual career plan as outlined in ORC 3313.603(D) or include in the student's IEP the components of an individual career plan that includes the following: The transition section of the student's IEP will include supports, services and post-secondary goals that allow the student to matriculate into a two year degree program or acquire a business or industry credential or enter an apprenticeship; The services section of the student's IEP will include counseling and support services that will address the child's needs and allow the child to successfully complete their transition plan; Complete the high school curriculum of 20 units that was in place prior to the Ohio Core Curriculum as outlined in ORC 3313.603(B).
Oklahoma	Oklahoma offers one high school diploma that is available for all high school students that meet the State minimum graduation requirements. Oklahoma offers two high school education tracks: 1) College Preparatory/Work Ready Curriculum or 2) Core Curriculum Standards. Parents or student have to provide in writing they wish to opt-out of the college preparatory/work ready curriculum. Both tracks meet the State's requirements for high school graduation and a standard diploma.
Oregon	 (b) A student may complete the requirements for an extended diploma in less than four years if the parent/guardian or adult student gives consent. The consent must be written and must clearly state that the parent/guardian or adult student is waiving the 4 years to complete the requirements for an extended diploma. A copy of all consents must be sent to the district superintendent. Each school district must annually provide the number of consents obtained to the State Superintendent of Public Instruction The consent may not be used to allow a student to satisfy the requirements for an extended diploma in less than three years. AND (7) A school district or public charter school shall: (a) Ensure that students have on-site access to the appropriate resources to achieve an extended diploma at each high school in the school district or at the public charter school. (b) Beginning in grade five, annually provide information to the parents or guardians of a student taking an alternate assessment of the availability of an extended diploma and the requirements for the extended diploma.
Rhode Island	The RIAA cannot be used to meet the state assessment requirement for earning a di- ploma. Upon determination of eligibility for RIAA, parents and students must be notified that the RIAA cannot be used to meet the state assessment requirement for earning a diploma.

Table F-3. States that Mentioned Implications for Accountability

State	State Responses and Policy Language
New York	The Board of Education or trustees of a school must (and the principal of a nonpublic school may) issue a Skills and Achievement Commencement Credential to each student with a severe disability in accordance with the following rules.
	1. Only students with disabilities who have been instructed and assessed on the alternate performance level for the State learning standards are eligible for this credential award.
	2. The credential may be awarded any time after such student has attended school for at least 12 years, excluding kindergarten or received a substantially equivalent education elsewhere; or at the end of the school year in which a student attains the age of 21.
	 The credential would not be considered a regular high school diploma in accordance with State standards or for federal accountability purposes
Utah	Students whose IEP team has determined that his/her participation in state-wide test- ing is through Utah's Alternate Assessment (UAA) may earn a high school diploma if all graduation requirements in place at the time of graduation are met. These students, as well as students who receive a Certificate of Completion will be counted as "Other Com- pleters" when calculating graduation rates for LEAs. AND
	Participated in UAA – G3 Alice's IEP team at Silverton High determined that her participation in state-wide assess- ment would be through UAA. Her IEP team carefully planned her courses of study during high school and Alice was able to receive a regular high school diploma by meeting graduation requirements with course substitutions after her class had graduated. Alice had previously been coded a "retained senior" (RT), but at graduation is coded as a G3 and is not considered to be either a graduate or a dropout, but is considered an "other completer".
Wisconsin	School districts are encouraged to issue the same diploma to all students with the tran- script documenting the differences in the academic program. However, school districts may develop a policy under s. 118.33 (1) (a), Wis. Stats., to issue multiple types of diplomas. For example, a district might issue a diploma based on 15 credits, a second diploma based on 24 credits, and a diploma based on demonstrating competency in lieu of credits. The label on the diploma may indicate the diploma is the traditional high school diploma, a basic diploma, or an alternative diploma. The label cannot in any way indicate it is a special education diploma.
	All students who graduate with a diploma issued under s. 118.33 (1) (a) or (d), Wis. Stats., are counted as graduates (R) within the Individual Student Enrollment System (ISES).

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