Utah State Board of Education | Special Education Services

GRADUATION GUIDELINES AND HIGH SCHOOL COMPLETION OPTIONS FOR STUDENTS WITH DISABILITIES

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INTRODUCTION

Graduation with a high school diploma is a goal of virtually all students and families of students enrolled in Utah's high school programs. The process of earning a diploma and participating in the high school graduation ceremony may be clear for most students. For Individualized Education Program (IEP) teams, including parents and students, however, it may be unclear what the optimal high school completion option is and any potential unintended consequences of that option.

PURPOSE

The purpose of this document is to assist IEP teams to make informed decisions about graduation and high school completion options for students with disabilities.

GRADUATION GUIDELINES FOR STUDENTS WITH DISABILITIES IDEA REQUIREMENTS

The Individuals with Disability Education Act (IDEA 2004) addresses graduation as follows:

> The obligation to make a free and appropriate public education (FAPE) available to all students with disabilities does not apply with respect to students with disabilities who have graduated from high school with a regular high school diploma.
>
> Graduation from high school with a regular high school diploma constitutes a change in placement, requiring written prior notice.
>
> The term regular high school diploma does not include an alternative degree that is not fully aligned with the state's academic standards, such as a certificate of attendance/completion or a General Educational Development Test (GED).
>
> An evaluation is not required before the termination of a student's eligibility due to graduation from secondary school with a regular diploma, or due to exceeding the age eligibility for FAPE under State law (34 C.F.R. § 300.102(a)(3).

The federal government has traditionally given states the authority to develop specific educational programs, including curriculum and graduation requirements. The Utah State Board of Education (USBE), through administrative rules, has set minimum requirements that students must complete to earn a high school diploma. These requirements apply to all Utah students, regardless of disability or English language acquisition status. While Local Education Agencies (LEAs) may set additional requirements, Section 504 of the Rehabilitation Act of 1973 prohibits discrimination in the implementation of grading policies, setting of graduation requirements, and awarding diplomas. Additionally, the student's transcript must not identify Special Education courses, although the LEA can identify modified courses with an asterisk or other symbol provided that the grade levels and courses are treated in a like manner for all students (Letter to Runkel, OCR, 1996).

USBE Administrative Rule R277-705, contains criteria that LEAs and students must follow to earn a diploma or a certificate of completion (R277-705-4. Diplomas and Certificates of Completion):

> LEAs shall award diplomas and certificates of completion.
>
> LEAs shall establish criteria for students to earn a certificate of completion that may be awarded to students who have completed their senior year, are exiting the school system, and have not met all state or LEA requirements for a diploma.

This rule also addresses graduation requirements for students with disabilities:

> A student with disabilities served by Special Education programs shall satisfy high school completion or graduation criteria, consistent with state and federal law and the student's IEP.
>
> An LEA may award a student a certificate of completion consistent with state and federal law and the student's IEP or Section 504 Plan.

ALTERNATE DIPLOMA

USBE Board Rule R277-705, Subsection 5, Alternate Diploma, includes information about the Alternate Diploma for a student with the most significant cognitive disability (SWMSCD).

IEP teams may determine that a SWMSCD: will receive their grade level instruction in the Utah Core Standards through the support of the Utah Alternate Achievement Standards, the Essential Elements, for English Language Arts, Mathematics, and Science; and may participate in Utah's state-wide alternate assessment, Dynamic Learning Maps (DLM), instead of the regular state-wide assessments. A student whose IEP team has determined that his/her participation in the state-wide assessment is through the alternate assessment may earn a regular high school diploma if the requirements are met at the time of graduation, or the Alternate Diploma if the LEA has adopted the Alternate Diploma option. If the IEP team determines that the student will earn a regular high school diploma, then that student's FAPE will end upon completion of the regular diploma.

If an eligible student completes all the requirements for the Alternate Diploma by the end of their original cohort year, then the LEA should award the student the Alternate Diploma (GA) in that year. If the student has not completed the requirements for the Alternate Diploma in their original cohort year and plans to return to school to work toward earning it the following year, then the LEA must report the RA code (retained senior on path the earning the Alternate Diploma). This code will reassign the student's cohort year to the next year. The student's cohort year will be reassigned one year at a time and can be reassigned multiple years in a row until the student completes the Alternate Diploma (reported to UTREx with the GA code), exits school, or otherwise ceases to continue on path to the Alternate Diploma. As long as the student remains in school working toward the Alternate Diploma the LEA must continue to report the student to UTREx with a high school completion status of RA, which will trigger the process in UTREx for the student's cohort year to be reassigned to the next year. Once the student has completed all the requirements for the Alternate Diploma then the LEA should award the Alternate Diploma (GA) in that year. The GA code does not end FAPE and the student can continue to receive post high services until they reach the maximum age of eligibility.

If a student is reported with the RA code and their cohort is reassigned, the only way the student can count as a graduate is with the GA code. Additionally, the student must return to school the next year or they will count as a dropout. Alternatively, if the RA code is reported and the student has a change in plans, the student's high school completion status can be updated with an S1-X record before the next October 1 submission deadline in order to avoid counting as a dropout. If the student then returns to school in a subsequent year, the student can still earn the Alternate Diploma, they just miss their opportunity to count as a graduate in a cohort graduation rate.

For more information on the Alternate Diploma see the Alternate Diploma Graduation Requirements and Course Options document and the Frequently Asked Questions Regarding the Alternate Diploma document on the USBE Postsecondary Transition and Graduation for Students with Disabilities webpage.

CERTIFICATE OF COMPLETION

A Certificate of Completion is not an academic credential and there is no state credit requirements outlined to earn a certificate of completion. As stated in Board rule R277-705-4:

> An LEA shall establish criteria for a student to earn a certificate of completion that may be awarded to a student who:
>
> - has completed the student's senior year;
> - is exiting or aging out of the school system; and
> - has not met all state or LEA requirements for a diploma.

Students who earn a certificate of completion are counted as “other completers” and therefore are not counted as graduates or dropouts in graduation and dropout calculations.

PARTICIPATION IN GRADUATION CEREMONIES

As noted in R277-705-4, school districts or schools are given the responsibility to award diplomas or certificates of completion. Students who meet graduation criteria are entitled to the same treatment as the nondisabled population, and this means that they have the same rights to participate in graduation ceremonies as any other nondisabled student of the same age would have. See the Letter to Runkle, OCR 1996, which states:

> School districts or schools are responsible for determining how students with or without disabilities who have not met graduation requirements participate in ceremonies where diplomas or Certificates of Completion may be awarded.
>
> The USBE recommends that LEAs clearly define in LEA policies or procedures the criteria for participation in graduation ceremonies by students who have not met graduation requirements. The USBE also recommends that the criteria for participation in graduation ceremonies be established district-wide, rather than at the individual school level.

> LEAs should make these policies and/or procedures available to students, parents, and LEA staff. This information should also be made available to the public prior to graduation dates.

MODIFYING GRADUATION REQUIREMENTS

R277-705-4(3) requires students with disabilities served by Special Education programs to satisfy high school completion or graduation requirements, consistent with state and federal law and the students' IEPs. The USBE Special Education Rules VII.C.2 allows the IEP team to modify graduation requirements.

R277-700-6(24)(a) allows graduation requirement modifications to meet the unique educational needs of a student if:

- the student has a disability; and
- the modifications to the student's graduation requirements are made through the student's individual IEP.

The rule requires that the LEA document the nature and extent of the modification, substitution, or exemption made to a student's graduation requirements in the student's IEP.

R277-700-6(26) offers further guidance regarding substitutions in graduation requirements:

> An LEA may modify graduation requirements for an individual student to achieve an appropriate route to student success if the modification:
>
> - is consistent with:
> - the student's IEP; or
> - SEOP/Plan for College and Career Readiness.
> - is maintained in the student's file;
> - includes the parent's signature; and
> - maintains the integrity and rigor expected for high school graduation, as determined by the Board.

While the USBE does not define "modifications, substitutions, and/or exemptions," IEP teams should consider the following guidelines:

- Documentation of any amendments should be cumulative in nature so that the IEP team is able to review previous amendments and accurately discuss the student's progress toward earning a diploma. An effective practice would include the date of the amendment and the parent's or adult student's signature.
- Documentation of amendments should be shared with the school counselor/registrar for inclusion in the student's high school transcript.
- Amendment of graduation requirements through course substitutions should be made only for courses other than RISE-, Utah Aspire Plus-, ACT-, or DLM-, producing mathematics, English language arts, or science courses. Office of Special Education Programs (OSEP) has determined that "access to the general curriculum" means the state academic standards at the grade level in which the student is enrolled (See OSEP Dear Colleague letter 11/16/2015) The USBE-Special Education Section considers that the rigor requirement described in R277-700-6(26) is met when the student is instructed in the student's grade appropriate standards for mathematics, English language arts, and science.
- When making amendments, the team should consider unintended consequences for the student's post-school activities. Exempting a student from world language classes may negatively affect college admission, for example.
- When amending graduation requirements, the IEP team should consider the effect on the student's progress toward achieving his/her measurable postsecondary goals. For example, it may be beneficial to substitute a food and nutrition class for an arts credit if a student's career goal is in the culinary arts. The same substitution may not be appropriate for a student who is interested in a career that requires a knowledge base in arts, such as graphic design.
- Exemptions to graduation requirements may occasionally be determined necessary by the IEP team. The IEP team should be cautious in recommending exemptions, as the outcome may not be beneficial to students.

CIVICS EDUCATION AMENDMENTS

HB 381 2025- Effective July 2025 (2026- 2027 School Year) legislation requires students to complete an additional 0.5 credits of government and citizenship and removed the requirement for the civics test. These changes are reflected in Board Rule R277-700-6.

ADULT EDUCATION PROGRAMS

Adult Education programs are available to out-of-school youth 16 years of age and older who are Utah residents, legal residents of the United States, are no longer enrolled in public education programs, or whose high school class has graduated and who do not have a high school diploma. These programs are available through Utah school districts as well as several community/faith-based organizations. Program and contact information is available on the USBE Adult Education website.

Programs may emphasize: English language acquisition and competency; basic skills in reading, writing, mathematics and problem solving; and academic/credit courses leading to an adult secondary diploma. Students who have not met high school graduation requirements and wish to earn a high school diploma might consider enrolling in an Adult High School Completion program; students whose literacy and numeracy skills are below the ninth-grade level and who wish to improve those skills might consider enrolling in an Adult Basic Education program, Students who would like additional instruction in English language acquisition might consider enrolling in the English Language Acquisition (ELA) programs.

Students with disabilities may enroll in Adult Education programs; students who do not have a high school diploma are still eligible for a FAPE (appropriate Special Education and related services) while in Adult Education until they reach maximum age (22) or receive a Utah Adult Secondary Diploma, whichever comes first.

Section 9 of the Utah Adult Education Policies and Procedures Guide outlines the Adult Education program responsibilities for students with disabilities.

For more information on Adult Education and Special Education collaboration effective practices see USBE Coordination of Services for Students with Disabilities Seeking Adult Education Services under the “Technical Assistance” tab.

GENERAL EDUCATIONAL DEVELOPMENT (GED) /HIGH SCHOOL EQUIVALENCY (HSE)

GED testing is open to individuals who are at least 16 years of age and not enrolled in any K-12 school. Students aged 16-18 must submit an application completed by the school stating that the student is not enrolled in a school and understands the possible consequences of withdrawing from school. Additionally, the application must be signed by representatives from an Adult Education program stating that the youth demonstrate the academic competencies required for passing the GED Tests, and by the youth's parents stating that the parents and youth understand the possible consequences of withdrawing from school. More information may be found at the USBE Adult Education web page.

The GED Test is composed of four subtests: Reasoning Through Language Arts, Mathematical Reasoning, Science, and Social Studies. Youth who pass all subtests with a standard score of at least 145 on each of the subtests will be awarded a Utah High School Completion Diploma.

Students with disabilities who earn a GED are eligible to return to the school system as this type of diploma does not qualify as a "regular high school diploma" and does not end the LEA's (both district and charter school) responsibility to provide a FAPE to eligible students (IDEA§300.102(a)(3)(i-iv).

FOCUSED GRADUATION PATHWAY (FGP) TO A HIGH SCHOOL DIPLOMA

The FGP provides an alternative route to graduation for students who are significantly behind in high school credits. The program allows students to earn a high school diploma by passing GED exams in four subject areas: Reasoning Through Language Arts, Mathematical Reasoning, Science, and Social Studies and utilizing those exams to earn credits. Students participating in the FGP do not have to withdraw from K-12 to take the exams.

The FGP is different from a GED in that the student continues enrollment in their public K-12 school; thus they do not have to be exited as a dropout to pursue the

diploma. Upon completion of the FGP the student will earn a regular high school diploma and will no longer be eligible for a FAPE.

To participate, schools must develop policies, obtain approval from their LEA board, and designate an FGP Coordinator. Students must meet specific eligibility criteria, including being significantly behind in credits and demonstrating a 9th-grade reading level. School programs should ensure that students receive necessary support to experience success, including subject area experts and accommodations for disabilities.

Upon successful completion of the GED exams and all LEA graduation requirements, students are awarded a regular high school diploma and may participate in graduation ceremonies. More information may be found on the USBE Focused Graduation Pathway website.

CAREER DEVELOPMENT CREDENTIAL (CDC)

The Career Development Credential is a career development focused credential that a student with an IEP or 504 plan can earn alongside a regular high school diploma, Alternate Diploma, or a certificate of completion. The CDC is not a diploma, nor is it equivalent to a diploma. Rather the CDC is a career-focused work experience credential that a student can earn while they are working toward a diploma or certificate of completion.

There are no high school completion status or exit codes for the CDC and no impact on graduation rates associated with the CDC. The CDC is implemented and tracked by the LEA.

For more information on the CDC see the Frequently Asked Questions Regarding the Career Development Credential and other supporting documents on the USBE Postsecondary Transition and Graduation for Students with Disabilities webpage

FEDERAL ADJUSTED FOUR- AND FIVE-YEAR COHORT GRADUATION RATE CALCULATIONS

Effective with the graduating Class of 2008, the USBE modified graduation calculations to meet updated federal requirements. Students who earn a basic high

school diploma or the Utah Adult Secondary diploma by the end of their cohort year will count in the numerator for the cohort graduation rate. A student can only be included once in a four- and five-year cohort graduation rate.

Effective in 2018 USBE added the Alternate Diploma for SWMSCD, as authorized in the Every Students Succeeds Act (ESSA). A student who earns the Alternate Diploma by the end of their four- or five-year cohort year (or, if applicable, their reassigned cohort year) can also count as a graduate (See "Every Student Succeeds Act (ESSA) High School Graduation Rate Non-Regulatory Guidance" and "Federal Graduation and Dropout Codes Reference" at on the Graduation/Dropout Rates tab).

The calculation for the cohort graduation rate is as follows, any student in their cohort year (or adjusted cohort year—see the section on the Alternate Diploma), is assigned to one of five outcome cohort categories. Students are included in the numerator if they earned a basic high school diploma, a Utah Adult Secondary Diploma, or the Alternate Diploma. This includes any of the following high school completion status codes reported to UTREX:

Graduates:

- Basic high school diploma (GM GR, GQ)
- Utah Adult Secondary Diploma (Carnegie units: GC)
- Alternate Diploma (for SWSCD: GA)

The cohort graduation rate calculation includes four of the categories in the denominator: graduate, other completer, continuing student, and dropout. Students in the fifth category, "excluded" are excluded from the calculation. High school cohort rates include four outcome categories: graduate, other completer, continuing student, and dropout. In addition to the graduate codes above, the denominator includes the following other completer, continuing student, and dropout high school completion status codes reported to UTREX:

Other Completer:

- GED/HSE (GG)
- Certificate of Completion (CT)
- Aged out (reached maximum age of eligibility for IDEA: AO)

Continuing student:

- Retained Senior (RT)
- Transferred to Higher Education (HE)
- Transferred to UTech (UC)
- Adult Ed student for whom the LEA will retain responsibility and continue to provide Special Education services (AS)

Dropout:

- Withdrew (WD)
- Unknown status (UN)
- Transferred to Adult Education (AE)
- Exited to take the GED (if not updated by September 30) (GE)
- Expelled (EX)
- Graduation pending (if not updated by September 30) (GP)
- Dropped out (DO)
- Summer dropouts (treated as unknown – student was expected to return to school after last enrollment but did not return by October 1)
- Retained Senior on path to the Alternate Diploma code (RA) - If this was the last code submitted for the student, but the student did not return to school, will be treated as a dropout

Excluded:

In some cases, a student may be excluded from the cohort high school completion rate calculations. This includes students whose final exit code or high school completion status code reported to UTREX before the end of the student's cohort year is one of the following:

- Died (DE)
- Foreign exchange (FE)
- Transfer out of country (TC)
- Transfer out of state (TO)
- Transfer to homeschool (CH, TH)
- Transfer to private school (TP)
- Withdraw for medical (WM)
- Withdraw from preschool (WP)

OFFICE OF SPECIAL EDUCATION PROGRAMS (OSEP) INDICATOR 1 HIGH SCHOOL REGULAR DIPLOMA COMPLETION RATE CALCULATION

Effective in Federal Fiscal Year (FFY) 2020 the OSEP indicator 1 calculation requirements are as follows. Each year, students age 14-21 who exit Special Education are identified. A subset of exiter types is included in the indicator 1 denominator (see list below). Students who earn a basic high school diploma or Utah Adult Secondary Diploma are included in the indicator 1 numerator. A student can earn the diploma in a year that is not their four-year cohort graduation year and still count as a graduate in the indicator 1 numerator (any year the student is age 14-21 and enrolled in special education):

- A student will be included in the indicator 1 denominator for every school year that they exit as one of the following exiter types:
    - Basic high school diploma (GM, GR, GQ)
    - Utah Adult Secondary Diploma (Carnegie units: GC)
    - Alternate Diploma (for SWSCD: GA)
    - Dropout (AE, DO, EX, GE, GG, GP, UN, WD, and Summer Dropouts)
    - Reached Maximum Age (AO)
    - Received a Certificate of Completion (CT)
    - Transferred to General Education (SCRAM Exit Reason A)

HIGH SCHOOL COMPLETION CODES

Using the correct exit and high school completion status codes will improve the accuracy of the graduation rate data by correctly coding the student as a graduate or non-graduate (i.e., other completer, continuing student, or dropout). The following scenarios may help clarify the use of high school completion status codes and exit codes.

Graduate (four-year cohort rate)—GR

Johnny completed his high school graduation requirements prior to the end of his four-year cohort. Johnny did not complete a fourth year of math. Johnny was coded

as a GR (or the equivalent for military children – GM) and was considered a graduate in the four-year graduation rate.

- Four-year Cohort graduation rate outcome: included in numerator
- Indicator 1 outcome: included in numerator

Graduate (four-year cohort rate)—GR

Johan completed his high school graduation requirements through the FGP prior to the end of his four-year cohort. Johan did not complete a fourth year of math. Johan was coded as a GR (or the equivalent for military children – GM) and was considered a graduate in the four-year graduation rate.

- Four-year Cohort graduation rate outcome: included in numerator
- Indicator 1 outcome: included in numerator

Graduate with fourth credit of math (four-year cohort rate)—GQ

Taylor completed their high school graduation requirements, including a 4th year of math, prior to the end of their 4-year cohort. Taylor was considered a graduate in the four-year graduation rate.

- Four-year Cohort graduation rate outcome: included in numerator
- Indicator 1 outcome: included in numerator

Graduate (five-year cohort rate)—GR

Jennie did not complete her high graduation requirements prior to the end of her four-year cohort (she was coded as RT and was a Continuing Student in the four-year cohort rate). Jennie completed her high graduation requirements prior to the end of her five-year cohort and was coded as GR. She was considered a graduate in the five-year graduation rate.

- Four-year Cohort graduation rate outcome: not included in numerator
- Five-year Cohort graduation rate outcome: included in numerator
- Indicator 1 outcome: included in numerator in the year she earned the diploma

Met requirements for the Alternate Diploma for students with the most significant cognitive disabilities—GA

Alice's IEP team determined she had the most significant cognitive disability which required intensive support and significant modifications to access grade level instruction and curriculum. They also determined that she would participate in the state-wide alternate assessment (DLM). Her IEP team carefully planned her courses of study during high school and Alice earned the Alternate Diploma for students with the most significant cognitive disability by meeting graduation requirements with course modifications. Alice is coded "Graduate Alternate Diploma" (GA). The Alternate Diploma can be treated as a graduate in the federal four-year adjusted cohort graduation rate (if requirements are met). The Alternate Diploma does not end FAPE; Alice can continue to enroll in her LEA for post-high transition services as determined by the IEP team.

- Four-year Cohort graduation rate outcome: included in numerator
- Indicator 1 outcome: included in denominator only

Retained Senior—RT

Juan was a student with a disability who did not complete his high school diploma requirements in four years. Because he continued to qualify for services, he returned to school for another year to complete his graduation requirements. At the end of his fourth year in high school, he was coded as a "retained senior" (RT) and should be coded with RT for each and every year afterward that he will be retained. Juan will count as a Continuing Student in the four-year graduation rate, which is neither a graduate nor a dropout. If Juan is retained again at the end of his fifth year (coded as RT) he will count as a Continuing Student in the five-year graduation rate as well.

- Four-year Cohort graduation rate outcome: included in denominator only (continuing students are not identified as graduates)
- Indicator 1 outcome: not included (continuing students are not identified as exiters)

Retained Senior on path to the Alternate Diploma—RA

James, a student with the most significant cognitive disability whose IEP team determined that he required intensive support and significant modifications to access grade level instruction and curriculum, and that he would participate in the state-wide alternate assessment (DLM). His IEP team carefully planned his courses

of study during high school, but due to illness James did not meet all the requirements to earn the Alternate Diploma by the end of his 12th grade year. James will return the following school year to continue to work toward earning the Alternate Diploma in post high school. James is coded “Retained senior on path to the Alternate Diploma” (RA) which will reassign his cohort to the following school year’s four year-cohort if he meets eligibility requirements.

The RA code can only be used if it is the student's four-year cohort year (including if it is a reassigned four-year cohort year). If the student has already been included in a four-year cohort graduation rate calculation in the past, they are no longer eligible to have their cohort year reassigned so the student should be reported with the RT code. When the RA code is used and the cohort year is reassigned but the student does not return to school they will be treated as a dropout.

- Four-year Cohort graduation rate outcome: If the student’s cohort year is reassigned to the next year, their four-year cohort status will be determined by the code reported at the end of the reassigned cohort year. Only the GA code can count as a graduate for a student with a reassigned cohort. If the student is reported with the RA code, the cohort is reassigned, and the student does not return to school the next year they will count as a dropout.
- Indicator 1 outcome: not included (continuing students are not identified as exiters)

Transfer to Adult Education—AS

Hassan leaves high school as an 11th grader and transfers to Adult Education but is still receiving special education services from his LEA (AS). Hassan does not complete the GED (GG) or Utah Adult Secondary Diploma (GC) by September 30th of his four-year cohort year. Hassan’s final exit code is AS, which will count as a continuing student in his four-year cohort graduation rate.

- Cohort graduation rate outcome: AS is included in denominator only (continuing student)
- Indicator 1 outcome: AS is not included (continuing students are not identified as exiters)

Transfer to Adult Education—AE

Jane leaves high school as an 11th grader and transfers to Adult Education (AE) and is no longer receiving services from her LEA. Jane does not complete the GED (GG) or Utah Adult Secondary Diploma (GC) by September 30th of her four-year cohort year. Jane's her final exit code is AE, which will count as a dropout in her four-year cohort graduation rate.

- Cohort graduation rate outcome: AE is included in denominator only (dropout)
- Indicator 1 outcome: AE is included in denominator only (dropout)

Complete a Utah Adult Secondary Diploma—GC

Janet left high school as an 11th grader and transferred to Adult Education (AE) (no longer receiving services from her LEA). Janet completed the Utah Adult Secondary Diploma (GC) by September 30th of her four-year cohort graduation year. Janet's last LEA updated her high school completion status by submitting an S1-X record to USBE. Janet's status in the four-year cohort graduation rate is now GC, which is treated as a graduate with a regular high school diploma.

- Cohort graduation rate outcome: GC is included in numerator (graduate)
- Indicator 1 outcome: GC is included in numerator (graduate)

Complete the GED—GG

Joy left high school as an 11th grader and transferred to Adult Education (AE) (no longer receiving services from her LEA). Joy completed the GED (GG) by September 30th of her four-year cohort graduation year. Joy's last LEA updated her high school completion status by submitting an S1-X record to USBE. Joy's status in the four-year cohort graduation rate is now GG, which is an 'Other Completer,' which is neither a graduate nor a dropout in her four-year cohort graduation rate. For Indicator 1 GG is considered a dropout.

- Cohort graduation rate outcome: GG is included in denominator only (other completers are not identified as graduates)
- Indicator 1 outcome: GG is included in denominator only (other completers are not identified as graduates)

Transferring to a Utah Technical College or an institution of Higher Education before graduation—UC or HE

Peter decides to transfer to a Utah Technical College (UC) or an institution of higher education (HE) before receiving his high school diploma. Peter is not considered a graduate or a dropout; rather, he will be coded as a "non-graduate", or more specifically, a "continuing student".

- Cohort graduation rate outcome: included in denominator only (continuing students are not identified as graduates)
- Indicator 1 outcome: not included (continuing students are not identified as exiters)

Not on time graduate (Graduate with regular high school diploma after the cohort year has passed)—GM, GR, or GQ

Mary repeats 10th grade, thus, she does not graduate in four years with her cohort. At the end of Mary's 11th grade, which is her four-year cohort year, if no high school completion status is reported she will be treated as unknown (UN) in the four-year cohort graduation rate, which is a dropout. If the high school completion status is reported as Retained Senior (RT) she will be treated as a Continuing Student in the four-year cohort graduation rate, which is neither a dropout nor a graduate in the four-year cohort graduation rate.

If Mary graduates with a regular high school diploma (GR) the following year (her 12th grade year) she will count as a graduate in the five-year cohort graduation rate and will be counted as a graduate in the indicator 1 rate for that year, but the opportunity for Mary to count as a graduate in a four-year cohort graduation rate has passed. This is due to very strict federal guidelines that only include **on-time** graduates in the four-year cohort graduation rate. Counting as a dropout in the four-year cohort graduation rate does not invalidate Mary's high school diploma.

- Four-Year Cohort graduation rate outcome (no code submitted, thus her 11th grade year status is unknown): included in denominator only (dropout)
- Four-Year Cohort graduation rate outcome (11th grade year status is submitted as RT): included in denominator only (continuing student)
- Five-Year Cohort graduation rate outcome (12th grade year status is submitted as GR): included in numerator (graduate with a regular high school diploma)

- Indicator 1 outcome (12th grade year status is submitted as GR): included in numerator (graduate with a regular high school diploma)

Certificate of Completion (CT) vs. Retained Senior (RT)

Luke is a student with a disability who has spent four years in high school. Because he continues to qualify for services, the school knows he will be returning the following year. However, he walks with his class and receives a certificate of completion/award of completion from the LEA. If the LEA knows he will be returning, Luke should NOT be coded with a high school completion status of CT. Instead, Luke should be coded as a retained senior (RT) each and every year until he finally completes his high school career, at which time the LEA can code him as "aged out" (AO).

- Cohort graduation rate outcome: CT and RT are both included in denominator only (certificate of completion, CT, is not identified as a graduate; continuing students, RT, are not identified as graduates)
- Indicator 1 outcome: CT is included in denominator only (certificate of completion is not a regular high school diploma). RT is not included (continuing students are not identified as exiters).

Aged Out—AO

Kate is a 22-year-old student with a disability who has not completed her high school requirements. Because she is ineligible to return to school for another year of services, the LEA should code her as an AO, which means she reached the maximum age of eligibility for services. The LEA may award Kate a certificate of completion/award of completion, but should NOT code her as CT. She will not be considered a dropout but will be considered a "non-graduate", or more specifically, an "other completer".

- Cohort graduation rate outcome: Very unlikely that a student is in their cohort year when they reach the maximum age of eligibility – would have had to have been reported with the RA code every year from their original cohort year until they reach the maximum age of eligibility. If this happens, they would be included in denominator only (other completers are not identified as graduates)
- Indicator 1 outcome: included in denominator only (reached maximum age)

Dropout, Graduation Pending, and Unknown—DO, GP, & UN

Perry does not complete graduation requirements in his 12th grade year. Perry may have: explicitly stated that he dropped out of school (DO); intended to complete graduation requirements during the summer but did not complete them by Sep 30 (GP); or left school without explanation and his status cannot be determined (UN). Perry will count as a dropout.

- Cohort graduation rate outcome: included in denominator only (dropout)
- Indicator 1 outcome: included in denominator only (dropout)

APPENDIX

FREQUENTLY ASKED QUESTIONS ABOUT GRADUATION

When does FAPE end?

A student's right to a FAPE ends when the student has graduated from high school with a regular high school diploma (GM, GR, GQ), or when a student receives a Utah Adult Secondary Diploma (GC) through an Adult Education program. Additionally, FAPE ends when the student reaches maximum age for eligibility (AO). In Utah, if a student is age 21 as of July 1 of the upcoming school year, they may enroll for the entire school year (if the student is 22 on or before July 1, they are not eligible to enroll).

A student's eligibility for FAPE does not terminate when the student receives a HSE, (earned by passing all subtests of the GED (GG)), a certificate of completion (CT), or the Alternate Diploma (GA).

Are any procedural safeguards required when a student with disabilities graduates from high school?

Yes. Graduation from high school with a regular high school diploma is a change in placement. The parent and adult student must receive prior written notice of this change a reasonable amount of time before the LEA proposes to terminate the student's eligibility under the IDEA by issuing the student a diploma; notification within at least 30 days of graduation would provide ample time for the parent or adult student to obtain legal guidance and file for a due process hearing, triggering the stay-put provision of IDEA. The prior written notice and notice of change of placement are generally included in a Special Education form titled "Prior Written Notice of Change of Placement in Special Education."

Can students who have graduated with a diploma continue to receive Special Education services under IDEA until age 22?

Yes and No. Students who earn the Alternate Diploma or graduate with a HSE remain eligible for a FAPE from a district or charter school until age 22. Students

who graduate with a regular high school diploma are no longer eligible for a FAPE under IDEA and Utah Special Education Rules. Students who have earned a regular high school diploma may be eligible to attend Adult Basic Education classes if they lack sufficient basic educational skills to function effectively in society or to obtain or maintain employment; these students are no longer eligible for a FAPE but may still be eligible for accommodations under Section 504. Any needed accommodations must be provided by the adult Education program.

WHAT IS REQUIRED FOR LEAS TO AWARD CERTIFICATES OF COMPLETION?

R277-705-4. Diplomas and Certificates of Completion.

(1) An LEA shall award diplomas and certificates of completion.
(2) An LEA shall establish criteria for a student to earn a certificate of completion that may be awarded to a student who:
    a. has completed the student's senior year;
    b. is exiting or aging out of the school system; and
    c. has not met all state or LEA requirements for a diploma

MAY AN LEA SET ADDITIONAL GRADUATION REQUIREMENTS?

Yes. The USBE has outlined minimum course requirements for a regular high school diploma in Rule R277-700. LEAs, through local school board approved policies, may set additional requirements.

MAY AN LEA USE DIFFERENT WORDING ON A DIPLOMA?

Yes. LEAs may offer different wording as long as the wording does not identify a student as a student with a disability. For example, for a student who completed the Alternate Diploma an LEA can give it a different name such as “Diploma of Achievement,” which is a different title than what is on a regular diploma but does not identify the students as a SWMSCD.

Must an LEA waive diploma requirements for students with disabilities?

No. The IEP team may choose to amend graduation requirements by modification, substitution, and/or exemption, but is not required to do so. If the IEP team amends graduation requirements, a cumulative record of such amendments should be kept in the student's IEP file for review by subsequent IEP teams. This will allow each team to monitor the student's progress toward earning a diploma.

Does a student who completes goals and objectives defined in the IEP automatically graduate with a regular diploma?

No. Graduation requirements for a diploma, above the state-required minimum, are set by the LEA. While all students are eligible to work toward a diploma, and may eventually earn one, Special Education eligibility does not guarantee that a student will be awarded a diploma. All students who earn a high school diploma must meet USBE minimum graduation requirements, although the IEP team may amend the requirements for an individual student.

Many LEAs allow students with disabilities to participate in graduation ceremonies without awarding the student a diploma; this may lead the student and his/her family to assume that the student has "graduated" from high school. IEP teams should discuss the LEA's policies or procedures regarding participation in graduation ceremonies by students who have not completed all graduation requirements. IEP teams, including the student and the student's parents, should discuss school exit options annually at IEP meetings beginning prior to ninth grade when students start to earn credits needed for a diploma. These exit options could include earning a diploma or a certificate of completion or staying in school until age 22.

May a student who participated in the Alternate Assessment DLM graduate with a regular high school diploma?

Yes, students who participate in state-level assessments through the alternate assessment DLM, may earn a regular high school diploma as long as all LEA graduation requirements are met prior to the student reaching age 22. However,

for a student accessing instruction through alternate achievement standards, it may be more appropriate for them to earn the Alternate Diploma.

If a student with an IEP completes the LEA's requirements for a high school diploma, must the student be awarded a diploma?

Yes. When LEA diploma requirements have been met, the student must be awarded the diploma. Once earned, the diploma may not be withheld in order to provide additional Special Education services to the student. Annual consideration of the student's progress toward earning a diploma will help alleviate a situation where the student wishes to receive additional Special Education services but cannot because they completed a regular high school diploma. IEP teams should be clear with parents about anticipated graduation dates, and that services end when the student completes their regular high school diploma.

May the student who has earned a diploma continue to receive special education services, including transition services?

Yes and No. The obligation of the LEA to make a FAPE available does not apply to students who have graduated with a regular high school diploma or a Utah Adult Secondary Diploma. The LEA (district and charter school) must make a FAPE available to a student who has earned a HSE, certificate of completion, or the Alternate Diploma. This reiterates the importance of early planning, agency collaboration, and communication with parents about school completion.

Can an LEA set specific requirements for participation in graduation ceremonies?

Yes. Decisions about participation in graduation ceremonies are made at the LEA level. USBE SES recommends that LEAs clearly define local policies and procedures and make them available to students, parents, and LEA staff.

FREQUENTLY USED ACRONYMS

DLM: Dynamic Learning Maps

EE: Essential Elements (Utah's Alternate Assessment)

FAPE: Free and Appropriate Public Education

FGP: Focused Graduation Pathway (R277-722)

GED: General Educational Development test

HSE: High School Equivalency (AKA GED)

IDEA: Individuals with Disabilities Education Improvement Act of 2004

IEP: Individualized Education Program

LEA: Local Education Agency; includes all 41 Utah school districts, the Utah Schools for the Deaf and the Blind, and all public charter school agencies

OSEP: Office of Special Education Programs

SES: Special Education Section

SWMSCD: Student with the Most Significant Cognitive Disability

USBE: Utah State Board of Education

GLOSSARY

Accommodations: Accommodations are practices and procedures that provide equitable access during instruction and assessments for students with disabilities, that are intended to reduce or even eliminate the effects of a student's disability that do not reduce learning expectations.

Modifications: Changes made to curriculum expectations in order to meet the needs of the student. Modifications are made when the expectations are beyond the student's level of ability. Modifications may be minimal or very complex depending on the studentperformance and must be clearly acknowledged in the IEP.

Exemptions: Freedom from an obligation; permission or entitlement not to do something that others are obliged to do.