**Trinity County SELPA Guidance: Diploma vs. Certificate of Completion**

**Introduction**

This document guides Individualized Education Program (IEP) teams that are considering whether a student identified as eligible for special education services is working toward earning a high school diploma or a Certificate of Completion (COC). Students with disabilities and their parents/guardians should be given adequate notice of the requirements for the various high school graduation options available, and IEP teams should evaluate several factors before determining the appropriate graduation option[[1]](#footnote-1).

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

* A regular high school diploma based on the state-mandated requirements
* A diploma based on University of California (UC) A-G requirements
* High school diploma equivalency (GED, HiSET, TASC)
* A certificate of completion.

**High School Diploma**

The term “regular high school diploma” is defined as a diploma fully aligned to grade-level standards. Students typically complete mandated academic courses and must earn a minimum grade point average to receive a standard high school diploma. [California Education Code 51225.3](https://codes.findlaw.com/ca/education-code/edc-sect-51225-3.html) defines the mandated high school courses needed to earn a regular high school diploma. The U.S. Department of Education’s Office of Special Education and Rehabilitation notes that the vast majority of students with disabilities should have access to the same high-quality academic coursework as all other students in the state. **The IEP team determines which graduation option is most appropriate for the student**, given the LEA/ district’s options as determined by the governing board.

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

In addition, certain student groups may be exempt from the LEA/districts’ graduation requirements. Under [Assembly Bill 167/216](https://www.sjcoe.org/fosterandhomelessservices/pdf/AB167-216%20FAQ's%5b1%5d.pdf), students identified as either foster youth or on probation, who are removed from their homes and transfer high schools after their second year, may graduate and earn a standard high school diploma by completing the minimum state graduation requirements if, at the time of transfer, they cannot reasonably complete additional local school LEA/district requirements within four years of high school. Similarly, under [Assembly Bill 1806](https://openstates.org/ca/bills/20132014/AB1806/), students identified as homeless are exempt from all coursework and other requirements that are in addition to the state minimum requirements of 13 year-long academic courses needed to earn a diploma.

**High School Diploma Equivalency Tests**

The California Department of Education has approved the use of three high school equivalency tests for students 18 years old (and some 17 years old), to receive a California High School Equivalency Certificate:

* General Education Development Test (GED)
* High School Equivalency Test (HiSET)
* Test Assessing Secondary Completion (TASC)

Postsecondary institutions, such as the University of California (UC) and California State University (CSU) systems, will accept a high school equivalency test in place of a diploma. However, students must still meet specific coursework, grade point average, and ACT or SAT examination requirements.

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

**Certificate of Completion[[2]](#footnote-2)**

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

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

California EC Section 56341-56345 and California EC Section 56390-56392 notes that a school district shall designate a COC, instead of a high school diploma, if a student with an IEP has met one of these requirements:

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

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

**Timeline for Students no Longer Eligible (Approaching 21 years, 11 months, Graduating, or Completing the Certificate of Completion)**

The table below outlines when a student is no longer eligible under the Individuals with Disabilities Education Act (IDEA) to receive specialized instruction and related services through an IEP. LEAs/districts should continue to provide a student an appropriate offer of a FAPE until the student is no longer eligible to receive it. LEAs/districts may neither develop nor implement an IEP that extends beyond eligibility dates; a prior written notice (PWN) is required upon the termination of special education services.

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| **Special Education Programs and Services will Conclude…** | |
| If the student’s 22nd birthday is between January and June:   * The student **may** continue through the remainder of the fiscal year (school year and extended school year, ending July 1st) | [EC 56026(c)(4)(A)](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=56026) |
| If the student’s 22nd birthday is in July, August, or September of the new fiscal year:   * The student may not begin a new fiscal year (school year and ESY ending July 1 of this year) | [EC 56026(c)(4)(B](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=56026.) |
| If the student’s 22nd birthday is during October, November, or December:   * The student shall be terminated from the program on December 31 of current fiscal year unless the student would otherwise complete his or her IEP at the end of the current fiscal year | [EC 56026(c)(4)(C)](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=56026.) |
| The student graduates from high school with a regular high school diploma | [EC 56026.1(a)](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=56026.) |

**Prior Written Notice: Changes to the Program when a Student Exits – High School Diploma[[3]](#footnote-3)**

The PWN is provided to inform parents/guardians and/or adult students prior to the LEA/district a change to the educational placement or provision of a FAPE based on the criteria of students completing their requirements for a high school diploma. The PWN should be completed immediately following the exit IEP and provided to parents/ guardians and/or adult students without delay prior to ending services. The PWN acts as the receipt to the decision around graduation and verification that the district requirements for graduation have been met.

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

The LEA/district should do the following:

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

**Prior Written Notice: Changes to the Program when a Student Exits – Certificate of Completion**

The PWN is provided to inform parents and/or adult students prior to the LEA/district’s termination of the educational placement or provision of a FAPE based on the criteria of students completing their high school requirements for a COC. The PWN should be completed immediately following the exit IEP and provided to parents/ guardians and/or adult students without delay prior to ending services. The PWN acts as the receipt to the decision around exiting the special education program and verification that the requirements have been met.

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

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

**Frequently Asked Questions**

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

Typically, students designated to receive a COC include students who:

* Have significant cognitive impairments.
* Participate in alternate statewide assessments, such as the California Alternate Assessment in English language arts, mathematics, and science.
* Cannot demonstrate subject competency in diploma-track classes, even with differential proficiency standards, accommodations, and modifications to the required courses and curriculum.

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

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

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

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

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

**Q: What is an Individual Transition Plan?**

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

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

The California EC lists the course of study pertaining specifically to earning a diploma. EC Section 51225.3 defines the coursework that all students receiving a diploma of graduation from a California high school must have completed while in grades 9–12, inclusive. It also allows other coursework adopted by the LEA/ district’s local governing board.

**Q: What factors should an IEP team consider in determining the ITP course of study?**

The IEP team should consider the students’:

* Goals upon completing high school
* Education/training, employment, and independent living
* Academic history and special education • Test data, including statewide testing scores and reading level
* Curriculum/course descriptions as related to LEA/district graduation requirements
* Attendance
* Behavior
* Graduation status

**Q: Can a student continue to get transition services after receiving a Certificate of Completion?**

Yes. If a special education student has not met the requirements for graduation (including the objectives of the statement of transition services), the LEA/district must continue to provide transition services to the student until she or he turns 22 years of age.

**Q: Does the LEA/district have to help students with disabilities transition from high school to adult life?**

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

**Appendix A: High School Graduation Options**

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

**Appendix B: High School Graduation vs. Certificate of Completion**

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|  | **Diploma** | **Certificate of Completion** |
| **Students' Postsecondary Goals & Personal Gains for Their Futures** | The student’s employment goals require a diploma; education/training goals require a diploma for eligibility for enrollment and/or financial aid. | The student who set the goal to achieve the certificate needs a meaningful certificate that prepares them for the “next environment.” |
| **Academic History** | The student has participated in a course of study that meets graduation requirements with/without accommodations or modifications. | The student’s course of study focuses on earning a certificate: functional skills, life skills, and vocational and community-access skills. |
| **Test Scores** | Academic tests are based on grade level standards. | Academic tests are based on alternate achievement standards. |
| **Transition in the IEP** | The student met high school graduation goals. Adequate transition services were provided to prepare for postsecondary goals. | The student met transition goals to earn a certificate of completion. |
| **LEA Diploma Requirements** | The student met LEA/district diploma/graduation requirements. | The student did not meet LEA/district diploma/graduation requirements. |
| **Graduation Status at Age 18** | The student met all criteria to graduate based on LEA/district standards and the IEP. | The student needs additional education to prepare for the transition. |
| **Credit Status** | Because an LEA/district must provide a FAPE to a student until they earn a high school diploma or reach the age of 22, when a student reaches the age of 18 or 12th grade, an IEP team does not need to automatically consider switching the student’s IEP from earning a high school diploma to receiving a COC. IEP teams may consider other viable options for such students, such as staying enrolled beyond the initial four-year graduation date, adult education, community college, or earning a Graduate Equivalency Diploma (GED) or industry certification. | Students earning a COC throughout high school and who do not complete the coursework required to earn a diploma can opt to stay in school up to age 22 in transition-age programs. |
| ***Questions/Discussion Items for IEP Teams to Consider:*** | | |
| * Start the conversation by the end of the eighth grade. * A diploma cannot be denied to students who have earned it, have met all graduation requirements, and have been provided adequate transition services that prepare them for meeting their transition goals. * Maturity and readiness for adulthood are **not** considerations for this issue. Few parents are convinced that their 18-year-old student is ready for adulthood; this issue speaks to having adequate post-school resources and programs in the community. * LEA/Districts need to carefully review their graduation requirements and the barriers that a lack of employment creates. * There is increasing emphasis on students with intellectual disabilities transitioning to integrated, competitive employment and earning competitive wages. | | |

**Appendix C: Sample Prior Written Language Notice**

[Insert Date]

Parent Name

Address

Re: High School Diploma Status/Determination

Dear Mr./Mrs. [Insert Parent/Guardian Name(s)/Adult Student Name]

This letter is to inform you of the decision to move forward with a high school diploma track for [insert student name]. Based on the conversations held during the IEP meeting on [insert date of meeting], the IEP team feels a certificate of completion is not appropriate at this time for the following reasons[[4]](#footnote-4):

* [student name] is not eligible for any alternative assessments as they do not have any significant cognitive disabilities
* With support [student name] is able to complete grade level work
* Based on current assessment information, work samples, and coursework, a functional skills or life skills program is unnecessary for [student name]

If you should have any additional questions or disagree with the decision above, you may contact the district administrator at:

[Insert LEA Administrator Name and Title]

[Insert LEA Administrator Phone Number]

[Insert LEA Administrator Email]

Additionally, you may also contact the Trinity County SELPA office with any concerns and possible dispute resolution activities. Trinity County SELPA contact information is as follows:

Anthony Rebelo

Assistant Superintendent, SELPA

530-634-2861 x249

[arebelo@tcoek12.org](mailto:arebelo@tcoek12.org)

Please also note that a copy of your procedural safeguards have been enclosed in this letter.

Sincerely,

[Insert Case Manager Name and Title]

1. See Appendix A for a Matrix of CA high school graduation requirements [↑](#footnote-ref-1)
2. See Appendix B for an outline of options available to students on a COC path [↑](#footnote-ref-2)
3. See Appendix C for a sample PWN [↑](#footnote-ref-3)
4. Please Note: reasons will vary based on the individual circumstances of the student; Appendix B should be referenced for documentation of diploma vs COC [↑](#footnote-ref-4)