



# *Information* UPDATE

Wisconsin Department of Public Instruction/Tony Evers, PhD, State Superintendent/P.O. Box 7841/ Madison, WI 53707-7841

**BULLETIN NO. 10.08**

**October 2010**

[Editorial Note: Revised 10-8-2020, Removed Question I.2.]

**TO:** District Administrators, CESA Administrators, CCDEB Administrators,  
Directors of Special Education and Pupil Services, and Other Interested Parties

**FROM:** Carolyn Stanford Taylor, Assistant State Superintendent  
Division for Learning Support: Equity and Advocacy

**SUBJECT:** High School Graduation and Students with Disabilities: How Students with  
Disabilities Meet the High School Graduation Requirements

## **Introduction**

Successful completion of high school is a critical prerequisite to success after high school. Individuals who have a high school diploma are considered for jobs not open to those who do not have a diploma. Many post-secondary education or training opportunities require a high school diploma. Students who do not graduate from high school usually experience lower rates of employment, lower incomes, and higher rates of incarceration. Generally, students with disabilities have lower high school completion rates than their classmates without disabilities. It is critical that students who obtain a diploma also have skills necessary for adult life. Since balancing instruction in academic and life skills can be difficult to do, adopting transition-focused education may help solve the problem. Transition-focused planning guides students in the discovery process towards meaningful adult outcomes. In addition, secondary transition requirements must be met within the individualized education program (IEP) to help create meaningful post-secondary goals related to employment, education, or training. [Replaces bulletin 01.02.]

The Individuals with Disabilities Education Act (IDEA) of 2004 emphasizes the need to ensure all children with disabilities have available to them a free appropriate public education (FAPE) that provides special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living. Graduation from high school is an important step toward achieving successful post-school goals, and meaningful transition services are crucial.

Adequate preparation for graduation entails a variety of considerations, including how to educate, assess, and accommodate students with disabilities. Special education law does not require that all students with a disability receive a high school diploma. However, a student with a disability continues to have a right to FAPE until graduation with a regular diploma or until the age of 21. An IEP team has no legal authority to alter graduation requirements established by district graduation policy. However, local school districts may use the IEP team process to determine whether the high school graduation requirements and local district policy have been met. For example, the IEP team may set educational goals and objectives in areas impacted by the student's disability. Successful completion of the goals and objectives in the IEP may be relevant in determining whether the student has met the academic performance criteria in the school board's graduation policy.

Schools are responsible for providing a learning environment that ensures students remain encouraged to earn a high school diploma. It is reasonable to expect that students with disabilities will complete their district's high school graduation requirements. Students with disabilities who experience difficulty with traditional teaching approaches and learning environments may need different teaching methods and a variety of teaching strategies to be successful in the general education curriculum, including added related or supplementary services. The services identified through the IEP and provided through special education must assist the student in focusing on meaningful post-secondary goals based on academic or content standards as well as the student's needs, strengths, preferences, and interests. Earning a high school diploma represents a key element of a viable transition plan for many students with disabilities.

If you have any questions, contact:

Transition Consultant

or

Alternative Education Consultant

(608) 266-1146 or (800) 441-4563

(608) 267-1062

This information update can also be accessed through the Internet:

**<http://dpi.wi.gov/sped/laws-procedures-bulletins/bulletins>**

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Comments:

We are interested in improving this document and welcome your suggestions.

You can email your comments to [dpisped@dpi.wi.gov](mailto:dpisped@dpi.wi.gov).

The following is a quick reference to questions, answers, and supplementary information provided in this bulletin:

### **Section I – Graduation with a Regular High School Diploma**

1. What is a regular high school diploma?
2. [Question Removed on October 8, 2020]
3. What is an alternative education program? (See Attachment II)
4. Can an alternative education program include preparation for a high school equivalency diploma (HSED)?
5. Who determines whether a student participating in an alternative education program has demonstrated the required proficiency to receive a regular high school diploma?
6. May students with disabilities be excluded from alternative education programs?
7. What is the authority for a school board to grant a regular high school diploma to a student who successfully completes his or her IEP program? (See Attachment II, PI 18.04)
8. Does the school board have to guarantee that all students with disabilities receive a regular high school diploma under their graduation policy?
9. Can students with disabilities receive a regular high school diploma that has a descriptor stamped on it, such as “alternative program” or “competency-based”?
10. Do students with disabilities who graduate with a high school diploma continue to be eligible for a free appropriate public education (FAPE)?

### **Section II – Completing a High School Equivalency Diploma (HSED)**

11. Under what circumstances, if any, is it appropriate for a high school student with a disability to begin pursuing an HSED?
12. What is the difference between a certificate of general educational development (GED) and an HSED?
13. What level of basic academic skill is required in order to successfully pass the GED tests, which are typically required for completing the HSED?
14. How do students, including students with disabilities, attend a program leading to an HSED rather than to high school graduation?
15. Can high schools begin preparing a student with a disability for the HSED early in the student’s high school experience?
16. Who should be involved in the decision-making process that results in a high school student with a disability being placed in an HSED preparation program at a technical college?
17. What if a technical college or community-based organization’s instructional staff finds that a contracted student with a disability lacks the basic skills necessary to benefit from a technical college or community-based organization’s HSED preparation program under s. 118.15 (1) (c) 2., Wis. Stats.?
18. Who pays for supports like supplementary aids, services, and assistive technology (above and beyond what the HSED program routinely provides for students who do not have a disability)?
19. What if an 18- to 21-year-old student with a disability has dropped out and, subsequently, decides he or she wants to obtain an HSED?
20. Who is responsible for providing the GED testing accommodations as part of an HSED program for a high school student with a disability? Should the IEP indicate this need?
21. How are GED accommodations different from accommodations traditionally written into an IEP?
22. What accommodations are available to candidates with a disability who take the GED test?
23. How are accommodations requested for students with disabilities?
24. Who is responsible for obtaining the psychological data required by the GED Testing Service for a high school student with a disability to document a request for GED test accommodation(s)?
25. Are there accommodations and test taking strategies that do not need approval?
26. Do students who complete the HSED requirements continue to remain eligible for FAPE?

27. What responsibility does a school district have for a student with a disability once he or she has completed an HSED program?
28. Must the local educational agency (LEA) offer to conduct a three-year re-evaluation on a student who has an HSED and remains eligible for special education?
29. What responsibility does the public school have for providing special education services to a student with a disability who enters an HSED program at the technical college after an HSED was started in a juvenile correctional facility?

### **Section III – Preparing Students for High School Completion**

30. How does the IEP help a student with a disability succeed in high school completion?
31. How are academic content standards and the general curriculum linked to the IEP and related to high school completion?
32. What are transition services?
33. When are transition services required?
34. How do transition services relate to high school completion?
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36. What is the summary of performance (SOP)?
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38. Must the SOP be developed by an IEP team?
39. How can the SOP be used to ensure a successful transition to post-secondary education, employment, and independent living?

### **Section IV – Practices in Graduation**

40. Is a district required to set up a senior exit meeting to go over the notice of graduation after an annual IEP has been conducted?
41. Does a district need to continue to have the IEP team meet to go over the notice of graduation or can just the parents and the special education teacher meet?
42. Can a student with disabilities participate in graduation ceremonies with peers if they have either an HSED or have not yet met graduation standards?
43. May a district give a certificate to a student leaving school who has not achieved the criteria needed to meet the local school board graduation policy (e.g., an "attendance" or "special" certificate)?
44. When exiting students in the Individual Student Enrollment System (ISES), is there a difference between students who leave with a high school diploma, a certificate of attendance (or completion) and an HSED?
45. How does graduation impact documenting a disability when transitioning to a post-secondary education setting?
46. What are the school's responsibilities for providing current assessment data for documentation of disability to enroll in a post-secondary education setting?

### **Attachment I – Excerpts from Wisconsin Statutes**

### **Attachment II – High School Completion Credential Data Collection and Reporting**

### **Attachment III – Resources and Websites**

## **Section I.**

### **Graduation with a Regular High School Diploma**

#### **1. What is a regular high school diploma?**

A regular high school diploma is a document issued by the school board to a student upon successful completion of a high school program. The school board establishes the required elements of its high school program in conformity with section 118.33 (1) of the Wisconsin Statutes. In general, a school board may grant a regular high school diploma to a student with a disability who has:

- Earned all required credits, or
- Participated in an alternative education program and demonstrated proficiency equivalent to earning required credits, or
- Successfully completed the program specified in the student's IEP.

#### **2. [Question Removed October 8, 2020]**

#### **3. What is an alternative education program?**

An alternative education program, as defined by s. 115.28 (7) (e), Wis. Stats., is an instructional program, approved by the school board, that utilizes successful alternative or adaptive school structures and teaching techniques and that is incorporated into existing, traditional classrooms or regularly scheduled curricular programs or that is offered in place of regularly scheduled curricular programs. School boards may approve alternative education programs designed to assist students in earning the necessary credits for graduation, or in demonstrating proficiency equivalent to earning required credits. An alternative education program is not a private school or home-based private educational program.

For more information on alternative education programs, please refer to:  
<http://www.dpi.wi.gov/alternativeed/index.html>

#### **4. Can an alternative education program include preparation for a high school equivalency diploma (HSED)?**

Yes, a school district may prepare students for the HSED, provided the school district has an approved General Educational Development Option #2 (GEDO #2) program. The school district must:

- Apply to the Department of Public Instruction (DPI) to offer the program and agree to the necessary assurances.
- Grant the student a regular high school diploma upon completion of the GEDO #2 program.

- Ascertain that students with disabilities have a current IEP that recommends participation in the GEDO #2 program and documents related supports and services necessary for successful completion of the program.

For more information on GEDO #2, see: <http://dpi.wi.gov/alternative-education/ged-option-2>

**5. Who determines whether a student participating in an alternative education program has demonstrated the required proficiency to receive a regular high school diploma?**

The school board determines whether the student has demonstrated a level of proficiency in designated subjects equivalent to that which he or she would have obtained if he or she had earned the credits required for graduation.

**6. May students with disabilities be excluded from alternative education programs?**

No. If the student qualifies for the program, that student has a right to have the supports and services identified in the IEP provided in conjunction with the program. Students cannot be required to exit special education in order to participate in any program offered by the school district. The IEP team determines whether such a program is appropriate to meet the educational needs of an eligible student.

**7. What is the authority for a school board to grant a regular high school diploma to a student who successfully completes his or her IEP program?**

School boards may develop policies under section PI 18.04 of the Wisconsin Administrative Code to issue a diploma to a student who has successfully completed his or her IEP program.

School boards have authority to design graduation policies that recognize coursework modified from the general curriculum. A competency-based approach could be used to demonstrate proficiency in designated subjects to earn credits leading to a regular high school diploma. Some schools use a parallel curriculum taught through special education classes to meet course credit requirements. Parallel curriculum should link to the district's general education curriculum and State Content Standards or the Extended Band Standards.

**8. Does the school board have to guarantee that all students with disabilities receive a regular high school diploma under their graduation policy?**

No. The board policy for high school graduation requirements does not have to guarantee that all students with disabilities receive a regular high school diploma. The school board is not required to lower or to effect substantial modification of standards to accommodate a student with a disability. However, a school board may use the goals and objectives in the IEP as an alternative means to satisfy academic performance criteria under its high school graduation policy. Whatever approach a school board chooses, it should be clearly stated within the local school board graduation policy and followed by IEP teams or other staff involved in decisions about a student's academic performance.

**9. Can students with disabilities receive a regular high school diploma that has a descriptor stamped on it, such as "alternative program" or "competency-based"?**

The school district may only issue a diploma consistent with school board policies. The school board policies may add descriptors to their regular high school diploma or student transcripts as long as they apply to all students with and without disabilities. The district must ensure confidentiality for students with disabilities and, therefore, may not use a descriptor that identifies the student as someone with a

disability. (Note: See OCR letters regarding “grading and diplomas” and “report cards and transcripts”—additional information is listed in Attachment III).

**10. Do students with disabilities who graduate with a high school diploma continue to be eligible for a free appropriate public education (FAPE)?**

No. Students with disabilities who have graduated from high school with a regular high school diploma are no longer eligible to receive special education services. When a student with a disability receives a regular high school diploma, it is considered a change of placement that requires notice.

**Section II.**  
**Completing a High School Equivalency Diploma (HSED)**

**11. Under what circumstances, if any, is it appropriate for a high school student with a disability to begin pursuing an HSED?**

If a student meets the basic requirements to participate in an HSED program (17 years of age or older, three or more credits behind, and 9<sup>th</sup> grade reading level), then the IEP team determines the educational services needed to provide FAPE and meet the needs of the student. The IEP team must consider program modifications and adaptations, supplementary aids, and services. If the IEP team determines that a 17-year-old student’s needs can be met appropriately through an HSED program, then the school district may enter into a contracted agreement for services. The LEA is required to provide, or pay for, the necessary supports and services for the student enrolled in the HSED program, and the IEP must specify those supports and services. A student who completes the HSED program is still eligible for FAPE—see question 26.

**12. What is the difference between a certificate of general educational development (GED) and an HSED?**

The GED is the general educational development test that was developed by the American Council on Education and is administered in Wisconsin at testing sites approved by the state superintendent and the American Council on Education. The GED test consists of a battery of tests to measure competency in math, science, social studies, and language arts (reading and writing). Persons who pass only the GED test battery qualify for a GED certificate issued by the DPI. This is the original program, begun after World War II and available for adults. Wisconsin’s version has four additional subject areas and is called the HSED. It consists of the GED test battery as well as health, civic literacy, employability skills, and career awareness. High school students accessing the program through a s. 118.15 contract must prepare for the GED test battery and the four additional HSED requirements (GED Option #1).

Note: Additional information on the different GED/HSED options can be found on the department’s website at: <http://dpi.wi.gov/ged>

**13. What level of basic academic skill is required in order to successfully pass the GED tests, which are typically required for completing the HSED?**

The GED tests are designed to measure academic outcomes (skills and concepts) associated with four years of regular high school instruction. Each of the five tests (writing skills, social studies, science, interpreting literature and the arts, and mathematics) uses a multiple-choice question format based on critical thinking and problem solving. In addition, the writing test has an essay component.

The tests are intended not to penalize candidates who lack recent academic experience or who have acquired their education in an informal manner. The context of the test items is relevant to adult experiences. Most test questions require the understanding of broad concepts and generalizations rather than the ability of the examinees to remember facts, details, or precise definitions. Generally, a 9<sup>th</sup> grade reading level is required.

The performance standard required of examinees in Wisconsin was set using a sample of graduating high school seniors. The passing score was set so it is comparable to the demonstrated performance of graduating seniors. It is important to note that when the performance standard was set, one-third of high school graduates could not have passed the GED tests.

**14. How do students, including students with disabilities, attend a program leading to an HSED rather than to high school graduation?**

Section 118.15 (1) (c) 2., Wis. Stats., allows a student enrolled in a public school district to attend a program leading to an HSED if the student is 17 years old, has a 9<sup>th</sup> grade reading level, the student and parent/guardian make the request in writing, and the school board agrees. A contract is entered into between the school district, the student, and the technical college or community-based organization that requires a minimum of 15 hours a week of educational programming.

For more information on contracting with technical colleges, see:  
<http://www.dpi.wi.gov/alternativeed/index.html>

**15. Can high schools begin preparing a student with a disability for the HSED early in the student's high school experience?**

No. Students, including students with disabilities, should not be tracked into the HSED program. A public school program should be designed to allow the pupils enrolled to meet high school graduation requirements and receive a regular high school diploma under s. 118.33, Wis. Stats.

**16. Who should be involved in the decision-making process that results in a high school student with a disability being placed in an HSED preparation program at a technical college?**

The IEP team must make this determination. A representative from the technical college system should be invited to the IEP meetings if placement in an HSED program will be considered. Any other individuals responsible for developing the contract for services between the school district and the technical college should also be invited and involved in the IEP meetings.

**17. What if a technical college or community-based organization's instructional staff finds that a contracted student with a disability lacks the basic skills necessary to benefit from a technical college or community-based organization's HSED preparation program under s. 118.15 (1) (c) 2., Wis. Stats.?**

The IEP team must be reconvened to determine changes needed in the student's program. This may include having the LEA provide for additional support to assist the student in the HSED program or consideration of a change in the student's enrollment in the program. A student with a disability, by definition, needs special education and related services. These specific services must be documented in the IEP, and the district must ensure they are provided. This remains true when a student with a disability attends a technical college through a written contract per s. 118.15, Wis. Stats.

The LEA is responsible for ensuring that needed special education and/or related services, while he or she attends the technical college, are provided. This does *not* mean that the high school has to *provide* these services. It may be more appropriate to have the technical college provide the services and adjust the contractual cost to the student's school district of residence accordingly. The written agreement must state the services provided, time period, and cost. Services provided must include those specified in the IEP.

The IEP should identify any special education, related services, or special factors a student needs while attending a technical college through a s. 118.15 contract. As part of transition planning, the technical college staff should be involved in the process of developing an IEP for these students. Since pursuing an HSED instead of a regular high school diploma is a very significant educational decision, the decision should also be documented in the student's IEP. Copies of the IEP should be available to all participants, including the parent or guardian.

**18. Who pays for supports like supplementary aids, services, and assistive technology (above and beyond what the HSED program routinely provides for students who do not have a disability)?**

The LEA is responsible for paying for all costs for the HSED program; this includes supplementary aids, services, and assistive technology. All services should be listed in the IEP and attached to the HSED contract.

**19. What if an 18- to 21-year-old student with a disability has dropped out and, subsequently, decides he or she wants to obtain an HSED?**

A student with a disability who has dropped out of school may re-enroll in high school in order to benefit from the rights that the student could receive through the IEP and placement process through age 21 (as defined in state and federal law). The IEP team determines the appropriate program and placement for the student. No high school student has a right to a contract leading to an HSED.

Any student 18.5 years or older may also enroll directly in a GED/HSED program.

**20. Who is responsible for providing the GED testing accommodations as part of an HSED program for a high school student with a disability? Should the IEP indicate this need?**

A GED Testing Center must ensure that no discriminatory testing services are provided to examinees with disabilities. The cost of testing accommodations is the responsibility of the agency/institution housing the test center, normally the technical college/correctional facility. The need for accommodations of any kind should be addressed in a student's IEP. Accommodation requests must have supporting documentation.

**21. How are GED accommodations different from accommodations traditionally written into an IEP?**

Because the GED is a test created for adults to demonstrate high school competency, the basis for adult accommodations is the Americans with Disabilities Act, not IDEA. The next few questions will serve to document the differences and the available accommodations.

**22. What accommodations are available to candidates with a disability who take the GED test?**

The range of accommodations is determined by the needs of candidates with disabilities. Need must be fully documented by a qualified and competent professional. The most common accommodations are

listed below:

- **Extra Time:** The time limits are extended under special conditions or when the audiocassette or Braille editions are used. Candidates with disabilities often require extra time to answer questions and may become easily fatigued.
- **Private Room:** Testing in a private room is available to those who, because of an illness or disability, need to be away from others. It is also available to those whose specific learning disabilities or psychological condition make testing in a group distracting to them or to other candidates.
- **Frequent Breaks:** Some examinees, because of physical discomfort or because of their inability to concentrate for extended periods of time, require frequent breaks during the test.
- **Interpreter:** A certified interpreter may be used to interpret test instructions for an essay topic only – not for multiple-choice test questions – to examinees with hearing impairments.
- **Scribe:** A scribe, sometimes called a secretary, amanuensis, or recorder, is someone who records the answers to multiple-choice questions, or the essay as dictated by the examinee. This accommodation is appropriate for those who have difficulty writing as a result of visual or physical impairments or specific learning disabilities.
- **Calculator:** Adults who are legally blind are entitled to use a talking calculator or abacus on the mathematics test. Adults with physical and specific learning disabilities may, under certain conditions, be granted the use of a calculator.

### **23. How are accommodations requested for students with disabilities?**

The HSED preparation program will work together with the case manager, the chief examiner, and the disabilities services specialist at the testing center to complete the proper forms and secure the proper documentation for the student.

### **24. Who is responsible for obtaining the psychological data required by the GED Testing Service for a high school student with a disability to document a request for GED test accommodation(s)?**

The student's LEA is responsible for ensuring that any documentation needed in order to obtain approval for testing accommodations for a high school student with a disability are provided to the GED examiner.

### **25. Are there accommodations and test taking strategies that do not need approval?**

Yes, some accommodations do not require special approval and are available to all test takers. Examples include:

- Large-print version of the test—without extended time
- Straight-edge guide to facilitate the reading of text
- Colored overlays for reading
- Clear transparent overlays and a highlighter
- Request to sit near a window, or away from fluorescent lights, etc., when possible
- Graph paper for working through math problems
- Individual tests on different days (granted at the discretion of the center and based on available personnel)
- Temporary adhesive (e.g., post-it notes) to help with spatial orientation
- Magnifying glass

**26. Do students who complete the HSED requirements continue to remain eligible for FAPE?**

Yes. An HSED is a high school completion credential and not a regular high school diploma. Students with disabilities remain eligible for FAPE until they graduate with a regular high school diploma or are no longer eligible to receive special education after their 21<sup>st</sup> birthday.

**27. What responsibility does a school district have for a student with a disability once he or she has completed an HSED program?**

The LEA should document completion of the HSED program. HSED program completion fulfills compulsory attendance requirements and the student is no longer required to attend school. The LEA should document they have offered FAPE by sending a letter to the parent/guardian/adult student explaining that since an HSED is not the same as a regular high school diploma, students remain eligible for services until they become 21 or graduate by completing their district's regular high school graduation requirements. All students (regular and special education) with an HSED may return to, enroll, and complete a regular high school diploma.

**28. Must the local educational agency (LEA) offer to conduct a three-year re-evaluation on a student who has an HSED and remains eligible for special education?**

Yes. This also is true for other students with disabilities who are enrolled, but not attending school, and have not received a regular high school diploma. The school district should offer to conduct a re-evaluation and notify parents and students that they are eligible for special education until they graduate or reach the age of 21.

**29. What responsibility does the public school have for providing special education services to a student with a disability who enters an HSED program at the technical college after an HSED was started in a juvenile correctional facility?**

Special statutory language exists under s. 118.15 (1) (cm), Wis. Stats., concerning students who begin an HSED program in a secured correctional facility, juvenile detention center, or county jail. That language states that if a student who is 17 years of age or older, with the written permission of his or her parent or guardian, began (passed at least one GED test) a program leading to a high school equivalency diploma while in a secured correctional facility, a secured child caring institution, a secure detention facility, or the juvenile portion of a county jail and requests to finish the program at a technical college, the school board is required to grant this request and enter into a written agreement with the technical college. The technical college must admit the student. The public school is not required to bear the cost of education services from the technical college. However, the public school is responsible for the special education and related services specified in the IEP.

### **Section III.**

#### **Preparing Students for High School Completion**

##### **30. How does the IEP help a student with a disability succeed in high school completion?**

IEPs document customized transition plans for students with disabilities. These include identifying strengths, interests, age-appropriate transition assessments, a course of study, transition services, and post-school goals. By creating meaningful and relevant courses of study, students engage in school seeing the value of coursework related to their future goals. The IEPs must include post-school transitional planning by age 14 (earlier depending on student need), which may include exploring the best high school completion option for the student with a disability.

##### **31. How are academic content standards and the general education curriculum linked to the IEP and related to high school completion?**

Academic content standards specify the essential knowledge, skills, and behaviors that all students are expected to achieve in school. The district's general education curriculum should provide the content and instructional activities to assist all students, including students with disabilities, to attain such academic standards. The IEP, through its goals, can provide access and learning opportunities (accommodations, adaptations, and specialized therapies, programs, and supports), and allow the student with a disability to be involved in, and make progress in, the general education curriculum. The goal is to maintain high expectations and individualized approaches to maximize learning and achievement for students with disabilities.

##### **32. What are transition services?**

The term "transition services" means a coordinated set of activities for a child with a disability that:

- is designed to be within a results-oriented process and focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities, including post-secondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation;
- is based on the individual child's needs, taking into account the child's strengths, preferences, and interests; and
- includes instruction, related services, community experiences, the development of employment and other post-school adult living objectives and, when appropriate, acquisition of daily living skills and functional vocational evaluation.

##### **33. When are transition services required?**

Beginning not later than the first IEP to be in effect when the child is 14, or younger if appropriate, measurable post-secondary goals, based upon age-appropriate transition assessments related to training or education, employment and, where appropriate, independent living skills, must be in the IEP. In addition, the transition services (including courses of study) needed to assist the child in reaching those measurable post-secondary goals must be defined.

**34. How do transition services relate to high school completion?**

Earning a high school diploma may be essential for successful school completion and part of a student's personal transition plan for the future. Some of the transition requirements include: identifying and writing meaningful measurable post-secondary goals, using age-appropriate transition assessments, identifying a meaningful course of study and needed transition services, and inviting not only the students but also the appropriate adult service agencies. Lastly, the development of a summary of performance is needed for all students who graduate. While school completion is important to future success, it is critical that students who obtain a diploma also have self-advocacy skills necessary for adult life.

**35. What are the school's responsibilities for transition requirements, including writing measurable post-secondary goals?**

The schools (with the students/parents) are responsible for development of a transition plan and providing the services specified in the plan. Educators are not responsible for the choices a student (or his or her family) makes when they leave school.

**36. What is the summary of performance (SOP)?**

The SOP documents the student's academic achievement and functional performance and includes recommendations on how to assist the student in meeting the student's post-secondary goals.

**37. When must an SOP be completed?**

The SOP must be completed when the student graduates with a regular high school diploma or exceeds the age eligibility for FAPE.

Information contained in the SOP can be developed at an earlier date if it will assist the student in accessing educational or employment opportunities.

**38. Must the SOP be developed by an IEP Team?**

No. An IEP team is not required to develop the SOP. However, an IEP meeting is required before the student's placement changes as a result of graduation with a regular high school diploma or exceeding the age eligibility for FAPE. It may be appropriate for the IEP team to develop the SOP at this meeting.

**39. How can the SOP be used to ensure a successful transition to post-secondary education, employment, or independent living?**

The SOP has multiple purposes:

- To assist in the student eligibility process for reasonable accommodations and support in post-secondary settings. (Please note that accommodations and supports that are written in the SOP are not guaranteed at the post-secondary level.)
- To assist in the Department of Vocational Rehabilitation's (DVR) assessment process.
- To assist the student in transitioning from high school to post-high school.
- To record summative documentation that goes with the student when he/she leaves high school.

\*The SOP does not meet the requirements of documenting a student's disability under the Americans with Disabilities Act (ADA) for post-secondary institutions. Please see the

newly updated WI Disability Documentation Guide, listed under Resources and Websites, Attachment III.

## **Section IV**

### **Practices in Graduation**

**40. Is a district required to set up a senior exit meeting to go over the notice of graduation after an annual IEP has been conducted?**

Yes, the district is required to set up, and complete, a senior exiting meeting.

**41. Does a district need to continue to have the IEP team meet to go over the notice of graduation or can just the parents and the special education teacher meet?**

The IEP team should review a student's IEP prior to graduation to determine whether the student will meet the district requirements for graduation and whether the IEP goals will be substantially completed prior to graduation. The district should provide the adult student and/or parent with notice of the team's decision.

**42. Can a student with disabilities participate in graduation ceremonies with peers if they have either an HSED or have not yet met graduation standards?**

Local school board policy determines who can participate in the graduation ceremony. In practice, some districts allow students who have not aged out of school or who received an HSED to walk across the stage having their name announced but not receiving a diploma. Students with disabilities who meet graduation requirements may not be precluded from participating in a main graduation ceremony. However, school board policy would define how students with disabilities, receiving an HSED, participate in the graduation ceremony.

**43. May a district give a certificate to a student leaving school who has not achieved the criteria needed to meet the local school board graduation policy (e.g., an "attendance" or "special" certificate)?**

A school district has the authority to award "certificates of attendance," or similar certificates, to students who do not, or cannot, meet the district's graduation criteria. However, students with disabilities remain eligible for FAPE until they graduate with a regular high school diploma or age out of special education at the end of the school term in which they turn 21.

**44. When exiting students in the Individual Student Enrollment System (ISES), is there a difference between students who leave with a high school diploma, a certificate of attendance (or completion) and an HSED?**

Yes, students who leave with a diploma issued by the school district under s. 118.33, Wis. Stats., are considered graduates for school performance reporting purposes. Students who leave with an HSED, or a certificate of attendance or completion, are considered completers. Students with disabilities who leave without any credential are considered aged-out for ISES purposes.

See Attachment II for an explanatory chart.

**45. How does graduation impact documenting a disability when transitioning to a post-secondary education setting?**

Graduation triggers the need for a student to identify where they are headed and if they need documentation in order to receive services under American Disabilities Act (ADA) at the post-secondary level.

**46. What are the school's responsibilities for providing current assessment data for documentation of disability to enroll in a post-secondary education setting?**

The school is not required to provide added assessments for documentation purposes to enter post-secondary education. Schools may provide needed assessment to enable the student to have documentation, based on current assessments, that establishes a disability currently exists and substantially limits one or more basic life activities. Assessment information can be used from the latest three-year evaluation and/or the SOP for this purpose.

## **Attachment I**

### **Excerpts from Wisconsin Statutes**

#### **Section 115.29 (4), Wis. Stats., High school graduation equivalency**

(a) Grant declarations of equivalency of high school graduation to persons, if in the state superintendent's judgment they have presented satisfactory evidence of high school courses completed in high schools recognized by the proper authorities as accredited, results of examinations given by or at the request of the state superintendent, successful completion of correspondence study courses given by acceptable correspondence study schools, a general educational development certificate of high school equivalency issued by an agency of the U.S. government, course credits received in schools meeting the approval of the state superintendent or other standards established by the state superintendent.

#### **Section 118.15, Wis. Stats., Compulsory school attendance**

(1) (c) 2. Upon the child's request and with the written approval of the child's parent or guardian, any child who is 17 years of age or over may be excused by the school board from regular school attendance if the child and his or her parent or guardian agree, in writing, that the child will participate in a program or curriculum modification under par. (d) leading to the child's high school graduation or leading to a high school equivalency diploma under s. 115.29 (4).

#### **Section 118.33, Wis. Stats., High school graduation standards; criteria for promotion**

(1) (a) Except as provided in par. (d), a school board may not grant a high school diploma to any pupil unless the pupil has earned:

1. In the high school grades, at least 4 credits of English including writing composition, 3 credits of social studies including state and local government, 2 credits of mathematics, 2 credits of science and 1.5 credits of physical education.

2. In grades 7 to 12, at least 0.5 credit of health education.

(am) The state superintendent shall encourage school boards to require an additional 8.5 credits selected from any combination of vocational education, foreign languages, fine arts and other courses.

(b) A school board may not grant a high school diploma to any pupil unless, during the high school grades, the pupil has been enrolled in a class or has participated in an activity approved by the school board during each class period of each school day, or the pupil has been enrolled in an alternative education program, as defined in s. 115.28 (7) (e) 1. Nothing in this paragraph prohibits a school board from establishing a program that allows a pupil enrolled in the high school grades who has demonstrated a high level of maturity and personal responsibility to leave the school premises for up to one class period each day if the pupil does not have a class scheduled during that class period.

(c) A school board may require a pupil to participate in community service activities in order to receive a high school diploma.

(d) A school board may grant a high school diploma to a pupil who has not satisfied the requirements under par. (a) if all of the following apply:

1. The pupil was enrolled in an alternative education program, as defined in s. 115.28 (7) (e) 1.
2. The school board determines that the pupil has demonstrated a level of proficiency in the subjects listed in par. (a) equivalent to that which he or she would have attained if he or she had satisfied the requirements under par. (a).

## **PI 18.04 Wisconsin Administrative Rule**

**PI 18.04 Accommodations for pupils with exceptional educational interests, needs, or requirements.** Education programs for high school graduation may be provided to accommodate pupils with exceptional educational interests, needs, or requirements.

(1) Education programs to accommodate pupils with exceptional educational interests, needs, or requirements shall:

- (a) State the specific nature of the exceptional educational interests, needs, or requirements;
- (b) State how the proposed program will respond to the exceptional educational interests, needs, or requirements;
- (c) State how the education program will address each of the requirements in s. 118.33, Wis. Stats., and s. PI 18.03 (1).

(2) Placement in a program under subch. V of ch. 115, Wis. Stats., meets the requirements in sub.(1).

(3) Programs to accommodate pupils with exceptional educational interests, needs, or requirements other than those under subch. V of ch. 115, Wis. Stats., shall be approved by the state superintendent.

(4) Successful completion of an education program under sub. (1) or (2) may result in issuance of a diploma.

## Attachment II

### High School Completion Credential Data Collection and Reporting

School districts submitting student data through the Individual Student Enrollment System (ISES) must select one and only one high school completion credential type for each student who completed high school. The following information is designed to assist in the description of the choices available.

Credential Type	Description
REGULAR HIGH SCHOOL DIPLOMA	<ol style="list-style-type: none"> <li>Any high school diploma granted by a school board that meets the requirements of s. 118.33 (1) (a) or (d), Wis. Stats.</li> <li>Includes students receiving other types of high school completion credentials <i>if they are also</i> granted a high school diploma by a school board meeting the requirements of s. 118.33 (1) (a) or (d), Wis. Stats.</li> </ol>
HIGH SCHOOL EQUIVALENCY DIPLOMA (HSED)	<ol style="list-style-type: none"> <li>Any high school equivalency credential issued by the State Superintendent under s. 115.29 (4) (a) Wis. Stats.</li> <li>Includes an HSED* issued to any student who <i>was not</i> granted a diploma by a school board under s. 118.33 (1) (a) or (d), Wis. Stats.</li> </ol>
OTHER HIGH SCHOOL COMPLETION CREDENTIALS (Certificate of Attendance, Certificate of Completion, etc.)	<ol style="list-style-type: none"> <li>Any high school completion credential issued by a school board that is not a diploma meeting the requirements of s. 118.33 (1) (a) or (d), Wis. Stats.</li> <li>Includes any high school completion credential issued to any student who was <i>neither</i> granted a diploma by a school board under s. 118.33 (1) (a) or (d), Wis. Stats., <i>nor</i> issued a high school equivalency credential by the State Superintendent under s. 115.29 (4) (a), Wis. Stats.</li> </ol>

\*Access to GED programs through school districts is provided through HSED programs (s. 118.15 contracts). Students who exit high school to pursue a GED or exit high school prior to successful completion of HSED programs are counted as dropouts.

NOTE: These credential types will be used for both SPR and NCLB Report Card Purposes. In addition, special education students are entitled to FAPE until they are granted a diploma by a school board under s. 118.33 (1) (a) or (d) or until they reach the maximum age of eligibility.

#### Sample of WINSS Data Reporting \$%#&[ High School

School Year	# of Cohort Dropouts + # of Students Who Reached the Maximum Age + # of High School Completers*	High School Completion Credential Type		
		Certificates	HSEDs	Regular Diplomas*
####-##	###	##/%	##/%	##/%
####-##	###	##/%	##/%	##/%
####-##	###	##/%	##/%	##/%

The denominator used in calculating percent of students who received certificates, HSEDs, or regular diplomas is the following sum: # of Cohort Dropouts + # of Students Who Reached the Maximum Age + # of High School Completers. Pursuant to NCLB, AYP is based on the percent of students who were granted a regular diploma. Note that students reaching the maximum age, certificate recipients, and HSED recipients are treated the same as dropouts for AYP purposes. Students who turned 21 during the school year (July 1 through June 30) without completing high school are counted as students who reached the maximum age during that school year.

## **Attachment III** **Resources and Websites**

Wisconsin Transition Improvement Grant: <http://www.witig.org>

Alternative Education: <http://dpi.wi.gov/alternative-education>

Special Education: <http://dpi.wi.gov/sped>

Transition: <http://dpi.wi.gov/sped/topics/transition>

GED/HSED: <http://dpi.wi.gov/ged>

OCR letters:

Report Cards and Transcripts: <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-20081017.pdf>

Grading and Diplomas: *Letter to Runkel*, 25 IDELR 387, 391 (OCR Region VIII 1996).

Special Education in Plain Language: <http://www.specialed.us/pl-07/pl07-index.html>

A Wisconsin Disability Documentation Guide:

[https://dwd.wisconsin.gov/dvr/trg\\_grant/guide\\_to\\_disability\\_documentation.pdf](https://dwd.wisconsin.gov/dvr/trg_grant/guide_to_disability_documentation.pdf)

Opening Doors series: <http://dpi.wi.gov/sped/topics/transition>

Contracting with the Technical College: [http://dpi.wi.gov/sites/default/files/imce/alternative-education/pdf/contracting\\_techcolleges.pdf](http://dpi.wi.gov/sites/default/files/imce/alternative-education/pdf/contracting_techcolleges.pdf)

GEDO (Option #2): <http://dpi.wi.gov/alternative-education/ged-option-2>

A Guide for Writing IEPs: <http://dpi.wi.gov/sites/default/files/imce/sped/pdf/iepguide.pdf>

A Guide for Connecting Academic Standards and IEPs, (Supplement to: A Guide to Writing IEPs, 2009):  
<http://dpi.wi.gov/sites/default/files/imce/sped/pdf/iepstandardsguide.pdf>