GUIDANCE FOR INDIVIDUALIZED EDUCATION PROGRAM (IEP) TEAMS: STUDENT PARTICIPATION IN STATEWIDE ASSESSMENTS FOR ACCOUNTABILITY AND GRADUATION

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Revision to guidance documents occurs based on feedback the Office of the Superintendent of Public Instruction (OSPI) receives from the local education agencies (LEAs), state stakeholder groups, the OSPI’s interpretation of law, court cases, and guidance from the Office of Special Education Programs (OSEP). The OSPI also revises guidance documents based on on-site and desk monitoring reviews, and formal written complaints.
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GUIDANCE FOR INDIVIDUALIZED EDUCATION PROGRAM (IEP) TEAMS:
STUDENT PARTICIPATION IN STATEWIDE ASSESSMENTS FOR
ACCOUNTABILITY AND GRADUATION

INTRODUCTION

Statewide assessments in Washington State serve two primary purposes: accountability and graduation. The purpose of this document is to provide guidance to Individualized Education Program (IEP) teams on their authority related to decisions around accountability and graduation and to help guide IEP teams in determining the appropriate assessment for accountability or graduation purposes. Appendix A contains a description of the state assessments required for accountability and graduation, as well as assessment graduation alternatives.

ACCOUNTABILITY ASSESSMENT DECISIONS

Participation in statewide accountability assessments is a critical element of equity and access to education. Recognizing that, federal and state laws require that all students enrolled in public schools participate in statewide:

- on-grade level academic assessments in English Language Arts (ELA), mathematics, and science, designed to provide accountability for the effectiveness of instruction in schools, and
- on-grade level English language proficiency for both knowledge and skills in reading, listening, writing, and speaking for students eligible for English language development (ELD) services.

These accountability assessments occur in grades 3–8 and 10 for ELA and mathematics; grades 5, 8, and 11 for science; and grades K-12 for English language proficiency. Results from these statewide assessments show what students at a particular grade level are expected to know and be able to do, based on the Washington State K-12 Learning Standards, and for students eligible for ELD services the Washington English Language Proficiency Standards, in comparison to the knowledge and performance demonstrated by all Washington students.

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1 The Washington State K-12 Learning Standards are called the K-12 Learning Standards for the purposes of this document.
2 The Washington English Language Proficiency Standards are called the ELP Standards for the purposes of this document.
The Every Student Succeeds Act (ESSA), or Public Law 114-95, reauthorizes the Elementary and Secondary Education Act (ESEA), the nation’s education law and longstanding commitment to equal opportunity for all students. The ESSA’s requirements concerning students with disabilities (SWD)³ include:

- schools are accountable to the public for the educational achievements of all students;
- all students participate in on-grade level assessments in order to meet this expectation of accountability; and
- assessments provide reasonable adaptations and accommodations for students with disabilities in order to measure the academic achievement of students in grade level standards.

The Individuals with Disabilities Education Improvement Act of 2004 (IDEA) articulates requirements related to the assessment of students with disabilities, as well. The IDEA also requires the participation of all students with disabilities in on-grade level state and districtwide assessments. Specific IDEA requirements include the following:

1) Students with disabilities are included in general state and districtwide assessment programs, with appropriate accommodations, where necessary⁴. The term “individualized education program” or “IEP” means a written statement for each child with a disability that is developed, reviewed, and revised in accordance with this section and that includes . . . a statement of any individual modifications in the administration of state or districtwide assessments of student achievement that are needed in order for the child to participate in such assessments; and if the IEP Team determines that the child will not participate in a particular state or districtwide assessment of student achievement (or part of such an assessment), a statement of (a) why that assessment is not appropriate for the child; and (b) how the child will be assessed (e.g., name of the alternate academic and/or language assessment(s) in which the student will participate).⁵

2) The State must ensure that all children with disabilities are included in all general state and districtwide assessment programs, including assessments described under section 1111 of the ESEA, 20 U.S.C. 6311 (i.e., mathematics, reading or language arts, and science, and any other subject determined by the State), with appropriate accommodations and alternate assessments, if necessary, as indicated in their respective IEPs.

Most Washington students receiving special education services will participate in Washington statewide on-grade level assessments of content for ELA, mathematics, science [i.e., Smarter Balanced, Washington Comprehensive Assessment of Science (WCAS)], with a smaller number also participating in assessments of language development [i.e., English Language Proficiency Assessment for the 21st Century (ELPA21)]. These assessments have a variety of accessibility tools available to all students, as well as accommodations for those with specific needs. A much

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³ Students with disabilities (SWD) are students eligible for special education and related services who have an Individualized Education Program (IEP). This does not include students eligible for only 504 plan services.


⁵ ibid, Sec. 614(d)(1)(A)(V-VI)
smaller number of students will participate in alternate assessments of academic content and language development, which are based on alternate achievement standards [i.e., Washington Access to Instruction & Measurement (WA-AIM) and WIDA™ Alternate Access for ELLs© (WIDA™)]. With multiple ways to participate, the question is not whether students receiving special education services will participate in statewide on-grade level assessments, but rather how they will participate.

Plainly speaking, this means that the IEP team must make a decision about three possible assessment options for statewide accountability assessments for grades 3-8 and 10 for ELA and mathematics, and grade 11 for Science:
1) Participate in the on-grade level statewide assessment without accommodations (i.e., standard administration);
2) Participate in the on-grade level statewide assessment with accommodations (i.e., participate with accommodations); or
3) Participate in the on-grade level alternate assessment.

**ASSESSMENT PARTICIPATION DECISION**

The decision about how an eligible student participates in the statewide assessment is an IEP team decision, and *not an administrative decision*. The IEP team decision must be made within the following two parameters:
1) The student must be eligible for special education and have an IEP in effect at the time of the decision and during the duration of the assessment.
2) IEP team decisions regarding a student’s participation in statewide assessments must be made at a scheduled IEP team meeting that precedes administration of the statewide assessment.

At least annually, the student’s IEP team meets to review the student’s present levels of academic achievement and functional performance (PLAAFP), need for specially designed instruction, annual goals, learner characteristics, including how the student’s disability(ies) affects his/her involvement and progress in the general education curriculum (the same curriculum for nondisabled students). The IEP meeting includes a determination of accommodations necessary to measure that performance on statewide and districtwide assessments or, in rare cases, whether the student’s participation in an alternate assessment is necessary and appropriate. **The IEP team does not have the authority to decide whether the student will or will not participate in a statewide or districtwide assessment for accountability.**

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6 WAC 392-172A-03090
ACCOMMODATIONS

IEP teams should begin the decision-making process about how a student will participate in the general assessment from the position that all students, including all students with disabilities, can learn grade level content with instruction, and should participate in the general assessment system to the maximum extent appropriate to their individual needs. One strategy in testing students with disabilities is the use of accommodations in addition to the standard administration of the test. Accommodations are changes to a test or testing situation that facilitate students' access to test content. Accommodations do not reduce learning expectations but are intended to reduce the effects of the student's disability and “level the playing field” and should remove “barriers” irrelevant to the content actually being assessed.

Accommodations are used widely for the assessment of students who, because of a disability, are deemed unable to participate meaningfully in state assessments under standard testing conditions. To be effective, accommodations must address the unique needs of the students for whom they are provided. The student’s IEP must include a statement of individual appropriate accommodations that are necessary to measure the academic achievement and functional performance on state and district-wide assessments. Accommodations are to be provided during instruction and during the administration of assessments as documented on the student’s IEP. Students with Section 504 Plans may also receive accommodations on the state tests. The general guidelines for accommodations for students with Section 504 Plans are identical to those for students with IEPs.

The decisions regarding accommodations for instruction and assessment should be considered during the IEP meeting at the following discussion points:

- Consideration of Special Factors – Special considerations need to be addressed in developing the IEP when considering factors unique to the student including:
  - use of positive behavioral interventions;
  - language needs related to the student’s IEP for an English Language (EL) student;
  - the student’s need for Braille;
  - the student’s language and communication modes and needs; and
  - need for assistive technology devices and services.
- Supplementary Aids, Accommodations and Modifications – This is the time when the IEP team discusses the services, activities, and supports that will be provided in general education classes and other education-related settings, which allow the student to be educated with non-disabled peers to the maximum extent appropriate.
- Statewide and Districtwide Assessments – The IEP team documents the participation of the student in state- and districtwide assessment.
- Assessment Accommodations – During this part of the IEP meeting, the team documents the accommodations that are needed to facilitate the participation of the student in state and districtwide assessment.
Washington’s Guidelines on Tools, Supports, & Accommodations (GTSA) for State Assessments identifies the embedded and non-embedded assessment accessibility features for eligible students that improve the student’s interaction with state assessments. **Tools** are available to all students and can be used at the student’s discretion. **Supports** are available to English language learners and any student with a need identified by an educator. **Accommodations** are for students who receive special education or 504 services with a documented need noted in an IEP or 504 plan.

IEP teams and Section 504 Plan teams are advised that there may be accommodations required for the teaching and learning of students with IEPs or 504 Plans that do not apply to state assessments and are not listed in or are not listed as an accommodation in the GTSA. The use of accommodations for instructional purposes is in no way restricted to only the ones indicated in the GTSA. IEP teams and Section 504 Plan teams are required to identify and ensure provision of all accommodations necessary to the individual student for instruction through the IEP meeting and Section 504 Planning processes.

**Section 504 Plan:** The decisions regarding accommodations for instruction and assessment can occur during the Section 504 Planning meeting. See information regarding Section 504 Plan development at [http://www.k12.wa.us/Equity/Section504.aspx](http://www.k12.wa.us/Equity/Section504.aspx)

The GTSA accessibility features have been approved by OSPI. The Guide provides information for classroom teachers, English development educators, special education teachers, and related services personnel to use in selecting and administering universal tools, designated supports, and accommodations for the content assessments of English language arts/literacy, mathematics, and science, as well as the state’s English language proficiency assessment. If a student’s IEP or 504 Plan documents the need for an accommodation that is not addressed within the GTSA, the student’s IEP or 504 team may have their school district personnel (e.g., District Assessment Coordinator) submit a Non-Standard Accommodation Request form.
ALTERNATE ASSESSMENT

The alternate assessment is a statewide testing option available only for students with significant cognitive disabilities. The term “significant cognitive disabilities” does not represent a new or separate category of disability. It is a designation applied to a small number of students with disabilities participating in the statewide testing program.

Students with significant cognitive disabilities means those students who require intensive or extensive levels of direct support that is not of a temporary or transient nature. Students with significant cognitive disabilities also require specially designed instruction to acquire, maintain or generalize skills in multiple settings in order to successfully transfer skills to natural settings including the home, school, workplace, and community. In addition, these students score at least two (2) standard deviations below the mean on standardized, norm-referenced assessments for adaptive behavior and intellectual functioning.

Washington has two alternate assessments. The WA-AIM is a performance task assessment aligned to the K-12 Learning Standards in ELA, mathematics, and science. Students meeting criteria and unable to participate in the Smarter Balanced ELA and mathematics tests and the WCAS should take the WA-AIM in all areas. The WIDA Alternate ACCESS is the English language proficiency assessment that is designed to test those English learners in grades K to 12 with significant cognitive disabilities who cannot meaningfully participate in the ELPA21 with accommodations. The decision that a student needs to participate in an alternate assessment would occur for approximately 1% of the total tested population. For example, if the total tested population in a school district were 4,000, then 40 students would represent 1% of the total tested population.

ALTERNATE ASSESSMENT PARTICIPATION DESCRIPTORS

For a student to be considered as having a significant cognitive disability and therefore, appropriate for consideration as a candidate for an alternate assessment a student must:

- have documented cognitive and adaptive behavior disabilities that are both at least two or more standard deviations below the mean and that are demonstrated in school, work, home, and community environments even with program modifications, adaptations, and accommodations;
- be eligible for special education under one or more of the existing categories of disabilities under IDEA (e.g., intellectual disabilities, multiple disabilities, traumatic brain injury, autism) and have an IEP in effect at the time of the decision and during the duration of the assessment;
- require extensive direct and individualized instruction and/or extensive supports in and across multiple settings to acquire, maintain and generalize academic and functional

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7 Kindergarten English learners who are eligible for an alternate assessment participate in the first grade WIDA Alternate ACCESS test. Kindergarten cut scores are established independent of the first grade expectations.
skills necessary for application in school, work, home, and community environments. The student’s need or extensive direct individualized instruction is not temporary or transient;

- be learning content that is linked to (derived from) the K-12 Learning Standards, that have been appropriately broken into a continuum of access points in order to provide the student with entry points of varying levels of complexity to show their knowledge and skills aligned to the K-12 Learning Standards; and

- need substantial supports to achieve gains in the grade and age-appropriate academic and functional curriculum and require substantially adapted materials and customized methods of accessing information in alternative ways to acquire, maintain, and generalize skills across multiple settings.

Students participating in the WIDA Alternate ACCESS must also be an English Learner as determined by the state identification procedures.

There are other issues that may affect a student’s educational experience and his/her ability to learn and show what he/she knows that are not appropriate to consider during the decision-making process for the alternate assessment. The following criteria may not be used for alternate assessment participation decisions:

- poor attendance, excessive or extended absences
- disability related to visual or auditory disabilities, emotional-behavioral disabilities, specific learning disabilities, or speech and language impairment
- lack of access to quality instruction in core standards
- social, cultural, linguistic, or economic differences for the WA-AIM; however cultural and linguistic differences should not be used as sole exclusionary factors for eligibility to participate in the WIDA Alternate ACCESS
- below average reading or achievement levels
- displays of behaviors or emotional distress during testing
- expectations of poor performance, non-proficiency, or the pre-determined or anticipated impact of the student’s performance on the school/district on-grade level assessment scores
- an administrative decision
- the student’s disability category, educational placement, type of instruction, and/or amount of time receiving special education services

Figure 1 and Figure 2 on the following pages outline the participation criteria and decision-making process for the WA-AIM and WIDA Alternate ACCESS. There is a difference in terms of participation criteria between Figure 1 (WA-AIM) and Figure 2 (WIDA). The difference is in the list of exclusionary factors in the boxes at the bottom of page for both charts. The main purposes for these lists of exclusionary criteria are to: (1) raise the probability that a student truly has a significant cognitive disability and (2) ensure that students are not inappropriately included or excluded from receiving an appropriate education and/or participating in the appropriate statewide assessment.

Figure 1 for the WA-AIM shows that “linguistic” and “culture” are two factors an IEP team may not use as the primary basis for a student participating in the WA-AIM, but Figure 2 for the
WIDA Alternate ACCESS does not include either of these as exclusionary factors. “Culture” and “linguistic” factors include, but are not limited to, recent immigration from another country; education disrupted during an immigration experience; acculturation experiences in the United States; cultural values which are distinctly different from those of the majority culture; bilingual/bicultural background of the family; and the influence of language and dialect on school performance.

Students with significant cognitive disabilities often have one or both of these factors that may contribute to academic and learning difficulties; however, the IEP team must rule out these factors as the primary cause of a student’s academic and learning difficulties to determine whether the student is eligible to participate in the WA-AIM. The fundamental principle underlying this rule is that a student should not be regarded as having a significant cognitive disability if (1) he or she has not been given sufficient and appropriate learning opportunities or (2) the student’s academic struggles are primarily due to factors other than a disability such as language or culture. This same “rule” does not apply to the WIDA Alternate ACCESS because:

- in order to participate in the WIDA Alternate ACCESS, the student must first be a student with a significant cognitive disability and eligible to participate in the WA-AIM (IEP team will need to use professional judgment for students in grades K–2), and
- the WIDA Alternate ACCESS is a test to assess the language proficiency of an EL with a significant cognitive disability; consequently, the student’s native language or culture should not exclude the student from participation in the WIDA Alternate ACCESS.

Figure 3 shows the sequence of decisions made by IEP teams when determining whether a student should participate in alternate assessment. If a student meets the guidelines to receive instruction on alternate academic or language achievement standards and takes alternate assessments based upon those alternate achievement standards, then all tested academic content, language, or other state-mandated assessments areas required for the student’s enrolled grade level, should be alternate assessments.

Finally, when an IEP team determines that the student should take an alternate assessment, the team must document in the IEP:

1) why the student cannot participate in the regular assessment, and
2) why the alternate assessment selected (i.e., WA-AIM and WIDA Alternate ACCESS) is appropriate to assess the student’s academic, or language if eligible, performance.
SUMMARY

All students should participate in the statewide assessment system. Like all IEP team decisions, the decision about whether or not the student will participate in the general on-grade level assessment with or without accommodations, or in the alternate assessment, must be carefully considered. Data and preferred practice suggest that an alternate assessment is necessary and appropriate for approximately 1% of the total student population being tested in the required grades. While the IEP team is ultimately responsible for determining the most appropriate assessment option for a student, these guidelines present some of the questions and considerations IEP team members must contemplate in their statewide assessment decision-making process. Utilizing these guidelines will help to ensure that the required measures of student progress are relevant, meaningful, and accurately depict the student’s accomplishments and needs for continued growth and development. These guidelines may also be used for IEP team decisions regarding any districtwide assessments.
**Figure 1. Guidelines for Participation in the WA-AIM Alternate Assessment**

The IEP team may decide that a student's knowledge and skills can best be assessed with the alternate assessment if the student meets all the following participation criteria:

<table>
<thead>
<tr>
<th>CRITERIA</th>
<th>DESCRIPTORS</th>
</tr>
</thead>
<tbody>
<tr>
<td>The student has an IEP in effect at the time of the assessment participation decision. Review of student records indicate a disability or multiple disabilities that significantly impact intellectual functioning and adaptive behavior.</td>
<td>The student must have a documented cognitive disability that affects intellectual potential. For the purposes of statewide assessments, the term students with “significant cognitive disabilities” refers to the population eligible to participate in the alternate assessment; it is not a new or separate category of disability.</td>
</tr>
<tr>
<td>The student requires extensive, direct, individualized instruction and substantial supports to achieve measurable gains in the grade and age-appropriate curriculum.</td>
<td>(a) The student requires extensive, repeated, individualized instruction and support that is not of a temporary or transient nature.</td>
</tr>
<tr>
<td>(b) The student uses substantially adapted materials and individualized methods of accessing information in alternative ways to acquire, maintain, generalize, demonstrate, and transfer skills across multiple settings, including school, workplace, community, and home.</td>
<td></td>
</tr>
<tr>
<td>The student demonstrates complex cognitive disabilities and poor adaptive skill levels determined to be significantly (at least two standard deviations) below chronological age expectations by the student’s most recent individualized eligibility determination.</td>
<td>The student scores at least two (2) standard deviations below the mean on standardized, norm-referenced assessments for adaptive behavior and intellectual functioning.</td>
</tr>
</tbody>
</table>

The determination for how a student participates in accountability and graduation assessments is **NOT** based on: (a) poor attendance, excessive or extended absences, (b) lack of access to quality instruction, (c) social, cultural, linguistic, or economic differences, (d) below average reading or achievement levels, (e) expectations of poor performance, (f) the anticipated impact of the student’s performance on the school/district performance scores, and (g) the student’s disability category, educational placement, type of instruction, and/or amount of time receiving special education services.
**Figure 2. Guidelines for Participating in the WIDA™ Alternate ACCESS for ELLs®**

The IEP team may decide that a student’s knowledge and skills can best be assessed with the alternate assessment if the student meets all of the following participation criteria:

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Descriptors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student is identified as an English learner.</td>
<td>The student has been identified as an English learner through following the state identification procedures.</td>
</tr>
<tr>
<td>The student has an IEP in effect at the time of the assessment participation decision. Review of student records indicate a disability or multiple disabilities that significantly impact intellectual functioning and adaptive behavior.</td>
<td>The student must have a documented cognitive disability that affects intellectual potential. For the purposes of state assessments, the term “significant cognitive disability” is a designation used to refer to the population eligible to participate in the alternate assessment; it is not a new or separate category of disability. (a) The student requires extensive, repeated, individualized instruction, and support that is not of a temporary or transient nature. (b) The student uses substantially adapted materials and individualized methods of accessing information in alternative ways to acquire, maintain, generalize, demonstrate, and transfer skills across multiple settings, including school, workplace, community, and home.</td>
</tr>
<tr>
<td>The student requires extensive, direct, individualized instruction and substantial supports to achieve measurable gains in the grade and age-appropriate curriculum.</td>
<td>The student scores at least two (2) standard deviations below the mean on standardized, norm-referenced assessments for adaptive behavior and intellectual functioning.</td>
</tr>
</tbody>
</table>

The determination for how a student participates in language proficiency assessments is NOT based on: (a) poor attendance, excessive or extended absences, (b) lack of access to quality instruction, (c) social or economic differences, (d) below average reading or achievement levels, (e) expectations of poor performance, (f) the anticipated impact of the student’s performance on the school/district performance scores, and (g) the student’s disability category, educational placement, type of instruction, and/or amount of time receiving special education services. All students who take the alternate English language proficiency assessment must be English learners and meet the eligibility criteria for the Alternate ACCESS assessment.
Figure 3. Alternate Assessment Participation Decision Flowchart

Consider These:

Results of Individual Cognitive Ability Test, Adaptive Behavior Skills Assessment, Individual/group/admistered achievement tests, and district-wide alternate assessments, and English learner (EL) language assessments, if applicable.

Data from scientific research-based interventions, progress monitoring data, results of informal assessments, teacher collected data and checklists.

Examples of curriculum, instructional objectives, and materials, work samples from school or community-based instruction.

Present levels of academic and functional performance, goals, and objectives, and post school outcomes from the IEP and the Transition Plan if applicable.

1. Do the student’s records indicate a disability or multiple disabilities resulting in scores of at least two (2) or more standard deviations below the mean on standardized, norm referenced tests of intellectual functioning and adaptive behavior?*

2. Will the student be appropriately challenged by goals and instruction linked to (derived from) the enrolled grade-level state standards?

3a. Does the student require extensive, repeated, individualized instruction and support that is not of a temporary or transient nature?

3b. Does the student use substantially adapted materials with individualized methods of accessing information in alternate ways to acquire, maintain, generalize, demonstrate, and transfer skills across multiple settings (e.g., school, workplace, community, and home).

Student must participate in the regular state assessment. Student may be eligible to use accommodations.

Student may participate in the alternate assessment.
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GRADUATION, DIPLOMAS, AND ASSESSMENT DECISIONS

While the process of earning a diploma and participating in the high school graduation ceremony may be clear for most students, the multiple pathways and options for students with disabilities served under an IEP may be confusing. The purpose of this section is to provide guidance to families, students, school staff, IEP teams, and others regarding the assessment graduation requirement.

IDEA REQUIREMENTS

The IDEA 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 K-12 Learning Standards, such as a general equivalency diploma (GED), certificate of completion, certificate of attendance, or similar lesser credential. The term also does not include alternate diplomas from other states.
- 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.

WASHINGTON RCW REQUIREMENTS FOR ASSESSMENT GRADUATION REQUIREMENTS

The federal government has traditionally given states the authority to develop specific educational programs, including curriculum and graduation requirements. In Washington, the State Board of Education (SBE) has the statutory authority to set graduation requirements for all students. According to Washington statute, “The purpose of a high school diploma is to declare that a student is ready for success in postsecondary education, gainful employment and citizenship, and is equipped with the skills to be a lifelong learner.”

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8 34 C.F.R. §102(a)(3)(i) defines a regular high school diploma as the standard high school diploma awarded to the preponderance of students in the State that is fully aligned with State standards, or a higher diploma, except that a regular high school diploma shall not be aligned to the alternate academic achievement standards described in section of the ESEA.

9 Washington does not have a certificate of completion or certificate of attendance as a “diploma option” for students with disabilities; however, other states do issue these lesser credentials. Students transferring into the state with such credentials (GED, certificate of completion, or certificate of attendance) continue to be eligible for FAPE.

10 RCW 28A.230.090 (1)
Washington’s policy of awarding the same diploma for all students, which means that all students meet the same broad components of the state’s graduation requirements, including:

1) earning the required credits established by the SBE,
2) having a High School and Beyond Plan (HSBP), and
3) meeting assessment requirements resulting in either a Certificate of Academic Achievement (CAA) or Certificate of Individual Achievement (CIA).
4) Local education agencies (LEAs) may set additional requirements.

These requirements apply to all Washington students, regardless of disability or English language acquisition status. Washington has one diploma that meets the federal requirements of a “regular high school diploma” and offers multiple pathways to achievement.

Within this broad framework, Washington also has policies designed to create flexibility for individual students, including students with disabilities, to meet these requirements. According to WAC 180-51-115, districts must have a board approved policy and procedures for granting a diploma to a student with disabilities that does not deny the student the opportunity to earn a high school diploma solely because of the student’s disability and that provides for meeting “the unique limitations of each student”.

**WAC 180-51-115 Procedures for granting high school graduation credits for students with special educational needs.**
(1) No student shall be denied the opportunity to earn a high school diploma solely because of limitations on the student’s ability. The board of directors of districts granting high school diplomas shall adopt written policies, including procedures, for meeting the unique limitations of each student. Such procedures may provide for:

(a) The extension of time the student remains in school up to and including the school year in which such student reaches twenty-one years of age;
(b) A special education program in accordance with chapter 28A.155 RCW if the student is eligible; and
(c) Special accommodations for individual students, or in lieu thereof, exemption from any requirement in this chapter, if such requirement impedes the student’s progress toward graduation and there is a direct relationship between the failure to meet the requirement and the student’s limitation.

(2) Unless otherwise prohibited by federal or state special education laws, such procedures may not provide for exemption from the certificate of academic achievement graduation requirement under RCW 28A.655.060 (3)(c).

While the IEP team may modify specific units of credits or courses toward the graduation requirements, the IEP team is not authorized to waive or exempt a student from the state accountability assessment requirements or the state-approved assessment graduation alternatives.
For a student with disabilities receiving special education services, it is the responsibility of the IEP team to determine when the student has met state and local graduation requirements. Neither federal or state regulations compel a school district to graduate a student with a disability who has met the state and district determined requirements for the award of a regular high school diploma (i.e., met the cohort credit requirements, passed the statewide assessment or an approved assessment graduation alternative, completed a High School and Beyond Plan (HSBP), and met any LEA criteria) if the IEP team agrees to continue the student’s secondary education. If the IEP team determines and documents that the student has not met his/her graduation requirements, the student is still entitled to a FAPE and can continue to be claimed for basic and special education apportionment.

**SETTING HIGH EXPECTATIONS**

One of the best ways schools and families can help students with disabilities to prepare for their future is to set high expectations and standards, while keeping the student’s individual needs in mind. Current research shows that family expectations play an important role in shaping the academic achievement of students, regardless of the presence of disability, the nature of the student’s disability, or their levels of functioning. All other factors considered equal, youth with disabilities whose families expect them to go on to post-secondary education after high school will often achieve more in high school than students whose families do not share that same expectation.

Most students with disabilities, given the opportunity and appropriate supports and services, have the ability to earn a regular high school diploma with a Certificate of Academic Achievement (CAA). Yet, data shows far too many students with disabilities are exiting high school with a Certificate of Individual Achievement (CIA).

In October 2018, the National Center on Education Outcomes (NCEO), analyzed Washington’s graduation pathways for and assessment participation issues related to student with disabilities. To examine the pathways that students with disabilities were pursuing overall and by district or region, NCEO concentrated on those pathways that potentially reflected lower standards for students with disabilities (CAA options; Awareness Level Waivers). These 2016–17 data for the state are reflected in Figure 4, along with data for other pathways. Percentages were calculated based on the total number of students with disabilities taking the tests. These data show that only about one-fourth of students with disabilities earned a diploma by taking the required regular state tests or one of the CAA options; most of these students (more than 25% in math and more than 28% in ELA) completed the regular state tests or an approved CAA options.

The majority of students with disabilities used CIA options for graduation (52% for math and 48.9% for ELA). A small percentage participated in the alternate assessment (about 8% for

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11 NCEO organized pathways into four categories: (a) High School General Assessment and CAA; (b) Alternate Assessments; (c) CIA Graduation Options; and (d) Not Yet Met Graduation Requirement.
both math and ELA) or had an Awareness Level Waiver (0.4% for both math and ELA). (See Appendix B for more details on these options across years.)

**Figure 4. Table of Graduation Pathways Used by Students with Disabilities in 2016–17**

<table>
<thead>
<tr>
<th>Category</th>
<th>Graduation Pathways</th>
<th>Math</th>
<th>ELA</th>
</tr>
</thead>
<tbody>
<tr>
<td>High School General Assessment or CAA</td>
<td>All Combined (EOC Math or ELA HS Proficiency Exam, Smarter Balanced; Collection of Evidence; Grades Comparison; College Entrance (PSAT, SAT, ACT, AP); Out of State Waiver)</td>
<td>25.6%</td>
<td>28.8%</td>
</tr>
<tr>
<td>Alternate Assessments</td>
<td>Total</td>
<td>8.5%</td>
<td>8.4%</td>
</tr>
<tr>
<td></td>
<td>WA-AIM</td>
<td>7.9%</td>
<td>8.0%</td>
</tr>
<tr>
<td></td>
<td>WAAS Portfolio</td>
<td>0.2%</td>
<td>0.0%</td>
</tr>
<tr>
<td></td>
<td>Awareness Level Waiver</td>
<td>0.4%</td>
<td>0.4%</td>
</tr>
<tr>
<td>CIA Graduation Options</td>
<td>Total</td>
<td>52.0%</td>
<td>48.9%</td>
</tr>
<tr>
<td></td>
<td>High School Proficiency Exam – Basic</td>
<td>16.7%</td>
<td>0.0%</td>
</tr>
<tr>
<td></td>
<td>Locally Determined Assessments</td>
<td>13.2%</td>
<td>10.6%</td>
</tr>
<tr>
<td></td>
<td>Off-Grade-Level Assessment</td>
<td>21.6%</td>
<td>25.3%</td>
</tr>
<tr>
<td></td>
<td>Smarter Balanced – Basic</td>
<td>0.5%</td>
<td>13.0%</td>
</tr>
<tr>
<td>Not Yet Met Graduation Requirement</td>
<td>Total</td>
<td>13.8%</td>
<td>14.0%</td>
</tr>
<tr>
<td></td>
<td>No Score</td>
<td>3.3%</td>
<td>0.0%</td>
</tr>
<tr>
<td></td>
<td>Tested: Not Met</td>
<td>10.5%</td>
<td>14.0%</td>
</tr>
</tbody>
</table>

Graphic displays of the pathways used by students with disabilities in 2016–17 are shown in Figures 5 and 6 below. For these figures, two pathways with fewer than 5% of students with disabilities were excluded (CAA and Special Waivers). These figures show that of the options available to students with disabilities, the most frequently used were off-grade-level assessments, the regular test, and the basic level of the regular test for ELA.
Figure 5. Percentages of Students with Disabilities Using Available Graduation Pathways for Math in 2016–17

Figure 6. Percentages of Students with Disabilities Using Available Graduation Pathways for ELA in 2016–17
GRADUATION PLANNING

Students with disabilities with their families and other members of their IEP team need to begin to plan for graduation early. It is important the team begin to investigate their district’s graduation requirements no later than middle school since the choices made may affect course selection even prior to the student entering high school. This early planning is part of the High School and Beyond Plan (HSBP) development that students begin in 7th or 8th grade.

Figure 7 on the following page depicts the multiple pathways to graduation for students with disabilities. Once students enter 9th grade, IEP teams can use the following steps to guide the assessment graduation decision making process.

1. During the meetings for the IEP(s) which would be in effect during the 10th or 11th grade assessments\(^\text{12}\), the team should determine whether the student will participate in the regular assessment with or without accommodation or whether the student will participate in the alternate assessment.

2. Students can meet the assessment graduation requirement by achieving the high school graduation threshold as established by the SBE.

3. For students not meeting the expected performance standards, the state also has approved graduation alternatives that can be used to fulfill assessment graduation requirements after the student attempts the on-grade assessment. Prior to selecting a graduation alternative, IEP teams should consider the need for additional or increased special education services, in conjunction with grade level core instruction, to support the student’s attainment of proficiency.

4. Students with disabilities who attempt the on-grade level assessment in the 10th grade for ELA and mathematics, but do not meet the high school graduation standard, will have access to retakes and Certificate of Academic Achievement (CAA) or Certificate of Individual Achievement (CIA) graduation assessment alternatives, as determined appropriate by, and documented in, the student’s IEP. IEP teams should first consider retakes and/or the CAA assessment graduation alternatives available for all students before considering CIA options. Assessment graduation alternatives that result in a CAA for the 2018–19 school year include dual credit courses, Locally Administered Assessment associated with a Locally Determined Course (LAA/LDC), College admission (i.e., American College Test (ACT) and SAT\(^\text{13}\)) and specified Advanced Placement (AP) and International Baccalaureate (IB) tests), and Grade Point Average (GPA) Comparison.

5. If the IEP team determines that retakes or the CAA options are not appropriate for the student, additional assessment graduation alternatives are available for consideration for some students with disabilities. The CIA Cut Score, Off-Grade Level (OGL) assessments (Smarter Balanced and WA-AIM), and Locally Determined Assessments (LDA) are graduation

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\(^{12}\) The 10th grade assessments include the Smarter Balanced and WA-AIM ELA and math assessment; the 11th grade assessments are the WCAS and WA-AIM science assessment

\(^{13}\) Formerly called the Scholastic Aptitude Test, now called the SAT.
alternatives for some high school students with disabilities who (1) have attempted, but did not pass, the 10th grade assessments and (2) are attempting to meet Washington’s assessment graduation requirement in order to earn a diploma. As these options are graduation assessment alternatives, the CIA Cut Score, OGL assessments, and the LDAs are not options available to students enrolled in grades 3–8.

6. Specifically, assessment graduation alternatives for students with disabilities include:

   a. A high school student whose IEP indicates that a CIA Cut Score is appropriate may meet the assessment graduation requirement by earning a level 2 on the on-grade high school assessment.

   b. Off-grade level assessments, another graduation alternative, can be accessed for state-level graduation purposes if the student’s IEP indicates that a lower grade level assessment (e.g., elementary or middle school level) is appropriate. When an OGL assessment is administered, the student must earn a Level 3 or Level 4 in order to satisfy the state assessment graduation requirement. IEP teams should consider how the OGL assessment being considered/selected aligns with the instruction provided to the student, and make an individualized decision.

   c. The LDA is a series of state-prescribed assessments that can be selected and administered at the local school level. They are available in the content areas of mathematics and ELA. The student’s IEP team must determine the most appropriate test for the student. Meeting standard on the prescribed LDA is scoring at or above the established minimum Grade Equivalency (G.E.) or the established passing score.

7. The CIA Cut Score, OGL assessments, and LDAs are options only for a high school student who has participated in the on-grade 10th grade assessments, did not achieve the graduation standard, and whose IEP specifies that one of the state approved alternatives is an appropriate option for the student to attempt in order to fulfill the state assessment graduation requirements. These options are not available to any student in grades 3–8 and they may not be applied as a graduation alternative prior to a student’s participation in the required on-grade 10th grade assessments.
Figure 7. Graduation Pathways for Students With Disabilities

For purposes of graduation, participation in a grade-level assessment (i.e., 10th grade math and ELA, and 11th grade science) is required prior to accessing CAA or CIA graduation alternatives. Science assessment requirement in effect for the class of 2021.

** CIA State Alternatives require participation in on-grade level assessments; then, if needed, IEP team can consider the CIA cut-score, an off-grade level (OGL) assessment on the regular assessment or WA-AIM, or a Locally Determined Assessment (LDA).
RESOURCES

OSPI Graduation in Washington Toolkits – Graduation Toolkits are a resource to help educators and families understand state graduation requirements. The toolkits for classes of 2018, 2019, and 2020 now include Graduation Checklists. School districts should ensure all key personnel are aware of the toolkits.

Questions and Answers on Report Cards and Transcripts For Students with Disabilities Attending Public Elementary and Secondary Schools - In October 2008, the Office of Civil Rights (OCR) released guidance regarding questions related to report cards and transcripts. Please refer to the Office of Civil Rights website at: https://www2.ed.gov/about/offices/list/ocr/letters/colleague-qa-20081017.html

State Board of Education (SBE) Graduation Requirements and Resources – The SBE is responsible for setting graduation requirements. This website provides information on graduation requirements and multiple resources related to graduation.

Washington Student Achievement Council (WSAC) High School Progress and Outcomes – Established in 2012, the Washington Student Achievement Council provides strategic planning, oversight, and advocacy to support increased student success and higher levels of educational attainment in Washington. The website provides information on cumulative graduation rate change, high school graduation rates over time, and other pathways to high school attainment (i.e., diplomas from community colleges and alternative credentials).
APPENDIX A: STATE ASSESSMENTS AND ALTERNATIVES FOR ACCOUNTABILITY AND GRADUATION DECISIONS
ACCOUNTABILITY ASSESSMENTS

- Students must take the on-grade level state assessments in ELA and mathematics in grades 3-8 and 10, and science in grades 5, 8, and 11 for accountability.14
- IEP teams may determine that a student requires accommodations in an area for which the student does not receive special education services.
- The charts below identify the on-grade level state assessments required for accountability for grades 3-8, 10, and 11.

<table>
<thead>
<tr>
<th>Smarter Balanced ELA and Mathematics Assessments</th>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spring 2019 ELA and Mathematics assessments (on-grade level) required for federal and state accountability</td>
<td>3-8</td>
<td>All students are required to take the on-grade level ELA and mathematics assessments for the grade in which they are enrolled. These tests are required for federal and state accountability for all students in grades 3-8.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• <strong>ONLINE:</strong> March 4 – June 7, 2019 (Administered within the last 12 weeks of the school year, but no later than June 7, 2019)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• <strong>PAPER/PENCIL:</strong> April 15 – May 24, 2019 (Paper testing is available only to support large print, braille, and standard print forms for students whose IEP or 504 plan states paper.)</td>
</tr>
<tr>
<td><strong>Students with disabilities:</strong> The IEP team is required to determine whether a student will take the on-grade level general assessment for ELA and mathematics with accommodations or without accommodations or if the student will take the on-grade level alternate assessment. The district is responsible for ensuring that the accommodations identified in the IEP are provided to the student.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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14 Assessments required for accountability include state testing required by state law (RCW 28A.230.095 and RCW 28A.655.070) and federal law (Elementary and Secondary Education Act). This includes the Smarter Balanced ELA and mathematics tests, Washington Comprehensive Assessment of Science (WCAS), and Washington – Access to Instruction and Measurement (WA-AIM) alternate assessment for Reading, mathematics and science.
### Smarter Balanced ELA and Mathematics Assessments

<table>
<thead>
<tr>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
</table>
| 10     | All students are required to take the on-grade level assessments in 10th grade for ELA and mathematics for federal and state accountability and to meet the graduation assessment requirements.  
- **ONLINE:** March 4 – June 7, 2019 (*Administered within the last 12 weeks of the school year, but no later than June 7, 2019*)  
- **PAPER/PENCIL:** May 3 – May 24, 2019 (*Paper testing is available only to support large print, braille, and standard print forms for students whose IEP or 504 plan states paper.*)  

**STUDENTS WITH DISABILITIES:** The IEP team is required to determine whether a student will take the on-grade level general assessments for ELA and mathematics with accommodations or without accommodations or if the student will take the on-grade level alternate assessment. The district is responsible for ensuring that the accommodations identified in the IEP are provided to the student.  

Any student not passing the ELA and/or mathematics assessments in grade 10 may participate in **Fall Retakes, Spring** administration of the test(s) in 11th or 12th grade, and/or any of the **CAA Assessment Graduation Alternatives**. Students with disabilities may also access **CIA Assessment Graduation Alternatives** (see information about these options below in the **State-Approved Assessment Graduation Alternatives**). IEP teams should document in the IEP the CAA or CIA graduation assessment alternative determined appropriate for a student. |
<table>
<thead>
<tr>
<th>Washington Access to Instruction and Measurement (WA-AIM)</th>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
</table>
| **WA-AIM ELA and Mathematics** (on-grade level) assessments for federal and state accountability | 3-8    | Eligible students are required to take the on-grade level WA-AIM assessments in ELA and mathematics for the grade in which they are enrolled. These tests are required for federal and state accountability for all students in grades 3-8.  
  - **ONLINE:** October 15 – April 5  
  - **PAPER/PENCIL:** Not available  

  **STUDENTS WITH DISABILITIES:** If the IEP team determines that the student must take an alternate assessment for ELA and mathematics instead of a regular state assessment of student achievement, the IEP must include a statement of (a) why the student cannot participate in the regular assessment; and (b) why the alternate assessment is appropriate for the student. |
| **WA-AIM ELA and Mathematics** (on-grade level) assessments for federal and state accountability AND meeting high school graduation assessment standard | 10     | Eligible students are required to take the on-grade level WA-AIM assessments in ELA and mathematics for the grade in which they are enrolled. These tests are required for federal and state accountability for all students in grades 3-8.  
  - **ONLINE:** October 15 – April 5  
  - **PAPER/PENCIL:** Not available  

  **STUDENTS WITH DISABILITIES:** If the IEP team determines that the student must take an alternate assessment for ELA and mathematics instead of a regular state assessment of student achievement, the IEP must include a statement of (a) why the student cannot participate in the regular assessment; and (b) why the alternate assessment is appropriate for the student. |
<table>
<thead>
<tr>
<th>Washington Access to Instruction and Measurement (WA-AIM)</th>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
</table>
| **WA-AIM Science** (on-grade level) assessment for federal and state accountability | 5, 8, and 11 | Eligible students are required to take the WA-AIM on-grade level science assessment in grades 5, 8, and 11. Required for federal and state accountability for all students in grades 3-8.  
  - **ONLINE:** October 15 – April 5  
  - **PAPER/PENCIL:** Not available  

**STUDENTS WITH DISABILITIES:** If the IEP team determines that the student must take an alternate assessment for science instead of the Washington Comprehensive Assessment of Science (WCAS), the IEP must include a statement of (a) why the student cannot participate in the regular WCAS assessment; and (b) why the alternate assessment is appropriate for the student.

<table>
<thead>
<tr>
<th>Washington Comprehensive Assessment of Science (WCAS)</th>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
</table>
| **Washington Comprehensive Assessment of Science (WCAS)** for federal and state accountability | 5, 8 | Required for federal and state accountability. All students take the grade level WCAS.  
  - **ONLINE:** April 15 – June 7, 2019  
  - **PAPER/PENCIL:** April 15 – May 24, 2019 *(Paper testing is available only to support large print, braille, and standard print forms for students whose IEP or 504 plan states paper.)*

**STUDENTS WITH DISABILITIES:** The IEP team is required to determine whether a student will take the on-grade level WCAS with accommodations or without accommodations or if the student will take the on-grade level WA-AIM alternate science assessment. The district is responsible for ensuring that the accommodations identified in the IEP are provided to the student.

STUDENTS WITH DISABILITIES: If the IEP team determines that the student must take an alternate assessment for science instead of the Washington Comprehensive Assessment of Science (WCAS), the IEP must include a statement of (a) why the student cannot participate in the regular WCAS assessment; and (b) why the alternate assessment is appropriate for the student.
<table>
<thead>
<tr>
<th>Washington Comprehensive Assessment of Science (WCAS)</th>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Washington Comprehensive Assessment of Science (WCAS)</strong> for federal accountability</td>
<td>11</td>
<td>The 5th, 8th, and 11th grade WCAS was administered for the first time in spring 2018. These tests fulfill the federal (ESSA) accountability reporting requirement that students be tested in science once at each level: elementary, middle, and high school. The WCAS measures the level of proficiency that Washington students have achieved based on the Washington State 2013 K-12 Science Learning Standards (adopted in October 2013).</td>
</tr>
<tr>
<td><strong>ONLINE:</strong> May 6 – June 7, 2019</td>
<td><strong>PAPER/PENCIL:</strong> May 3 – May 24, 2019 (Paper testing is available only to support large print, braille, and standard print forms for students whose IEP or 504 plan states paper.)</td>
<td></td>
</tr>
</tbody>
</table>

*Passing the WCAS for graduation will be required for the class of 2021.

**STUDENTS WITH DISABILITIES:** The IEP team is required to determine whether a student will take the on-grade level WCAS with accommodations or without accommodations or if the student will take the on-grade level WA-AIM alternate science assessment. The district is responsible for ensuring that the accommodations identified in the IEP are provided to the student.
ASSESSMENT GRADUATION ALTERNATIVES

- After attempting the on-grade level assessment for accountability, students with disabilities in grades 11-12 may access the Certificate of Academic Achievement (CAA) or Certificate of Individual Achievement (CIA) Assessment Graduation Alternatives as determined appropriate by their IEP teams.

- Earning a CAA or CIA is required by RCW 28A.655.061 and RCW 28A.155.045 for the purpose of meeting the assessment graduation standard.

- Off-Grade Level (OGL), CIA Cut Score (formerly Basic/L2), and the Locally Determined Alternative (LDA) are only available to eligible high school students with disabilities as an assessment graduation alternative.

- Students must be currently enrolled and receiving special education and related services in order to submit the required information and documentation for a CIA Assessment Graduation Alternative.

- Best practice: Information about all testing programs for accountability and graduation should be disseminated to the parents and students during the IEP meeting for 7th and 8th grade to coincide with the development of the High School and Beyond Plan (HSBP).

- The charts below identify the state-approved alternatives for students to meet the graduation standards and waivers.

<table>
<thead>
<tr>
<th>Smarter Balanced ELA and Mathematics Assessments</th>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
</table>
| **Fall 2018 Retake** of the regular ELA and mathematics assessments (on-grade level) for meeting the high school graduation assessment standard. | 11, 12 | Available to students in the class of 2020 or earlier (enrolled as 9th graders in 2015-16 or earlier) who have not yet passed the high school ELA and/or mathematics assessments to meet the graduation assessment standard.  
  - ONLINE: October 22 – November 16, 2018  
  - PAPER/PENCIL: October 29 – November 16, 2018 (Paper testing is available to support large print, braille, and standard print forms for students whose IEP or 504 plan states paper.)  
  **STUDENTS WITH DISABILITIES:** The IEP team is required to determine whether a student will retake the on-grade or off-grade level (see Off-Grade Level option below) general assessments for ELA and mathematics, with accommodations or without accommodations, or if the student will take the on-grade or off-grade alternate assessment. The district is responsible for ensuring that the accommodations identified in the IEP are provided to the student. |
<table>
<thead>
<tr>
<th>Smarter Balanced ELA and Mathematics Assessments</th>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
</table>
| **Spring 2019 Retake** ELA and mathematics assessments (on-grade level) for meeting the high school graduation assessment standard. | 11, 12 | Available to students in the class of 2020 or earlier (enrolled as 9th grader in 2015-16 or earlier) who have not yet passed the high school ELA and/or mathematics assessments to meet the graduation standard.  
- **ONLINE:** March 4 – June 7, 2019 (Administered within the last 12 weeks of the school year, but no later than June 7, 2019)  
- **PAPER/PENCIL:** May 3 – May 24, 2019 (Paper testing is available only to support large print, braille, and standard print forms for students whose IEP or 504 plan states paper.)  

**STUDENTS WITH DISABILITIES:** The IEP team is required to determine whether a student will retake the on-grade or off-grade level (see Off-Grade Level option below) general assessments for ELA and mathematics, with accommodations or without accommodations, or if the student will take the on-grade or off-grade alternate assessment. The district is responsible for ensuring that the accommodations identified in the IEP are provided to the student. |

<table>
<thead>
<tr>
<th>End-of-Course (EOC) Math</th>
<th>Grades</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>End-of-Course (EOC) Math</td>
<td>11</td>
<td>The EOC Math exam is only applicable to meeting the mathematics graduation assessment requirement for students in the classes of 2017 and 2018 (students enrolled in 9th grade in 2013 or 2014 respectively).</td>
</tr>
<tr>
<td>CAA Assessment Graduation Alternatives</td>
<td>Grade</td>
<td>Information</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>-------</td>
<td>-------------</td>
</tr>
</tbody>
</table>
| Students not passing on their first attempt at the state on-grade level ELA and mathematics assessments, may access state approved **CAA Assessment Graduation Alternatives** if the student meets **eligibility criteria**. The assessment graduation options provide students with the opportunity to demonstrate their knowledge and skills using methods other than state accountability tests. | 11, 12 | **Eligibility criteria** to access Assessment Graduation Alternatives (both CAA and CIA options) is driven by one of two factors:  
1. Testing History: Did the student participate in the required state accountability assessments?  
2. Transfer Status: Did the student transfer after required state exams were administered?  

**Testing History:**  
- **OSPI Policy for the class of 2019 or earlier:** Students in the class of **2019 and earlier** will be considered participants in a 'statewide student assessment' in ELA and/or mathematics and may access assessment graduation alternatives if the student's assessment is state-administered and the assessment fulfills the student's CAA/CIA graduation requirement. **This policy allows (as applicable, according to IEP) students with disabilities from the class of 2019 and earlier to use an off-grade assessment in ELA and/or mathematics as the “statewide student assessment.”** Assessments that meet the assessment graduation requirements are not necessarily the same as federal accountability exams. A student's assessment graduation requirements are dependent on his or her graduation cohort. For more information on assessments according to cohort, please refer to OSPI's **State Testing** webpage.  
- **OSPI Policy for the class of 2020 and beyond:** Every 10th grade student enrolled during the administration of the state Spring 2019 ELA and mathematics assessments must attempt the regular on-grade level state assessments, or a retake opportunity in 11th or 12th grade, before gaining eligibility to submit assessment graduation alternatives in the respective content area.  

**Transfer Status:**  
The transfer must be from out of state (OOS), out of country, or from a private/home school environment. Because testing drives access to assessment graduation
alternatives, those who were not enrolled in Washington state schools during the required administrations of the state assessments (as outlined below) are not required to sit for the assessment prior to gaining eligibility for assessment graduation alternatives (including an Out of State waiver) in the respective content area.

- **For the class of 2018 and earlier:** the required administrations of ELA and mathematics Smarter Balanced assessments occurred in spring of the 11th grade year.
- **For the class of 2019:** A class of 2019 student who transfers into WA state schools in their junior or senior year will be granted eligibility to submit graduation alternatives without first taking the test.
- **For classes of 2020 and beyond:** the required administrations of ELA and Mathematics Smarter Balanced assessments occur in spring of the 10th grade year.

If a student was enrolled during a required testing administration of the Smarter Balanced assessment, but did not test, he or she MUST participate in an on-grade level re-take before gaining eligibility to submit any assessment graduation alternatives. In order to impact eligibility, final student assessment scores must be present in the CAA/CIA database.

<table>
<thead>
<tr>
<th>CAA Assessment Graduation Alternatives</th>
<th>Grade</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Dual credit course</td>
<td>11, 12</td>
<td>Dual credit courses result in college-level credit for the content area for students enrolled during or after 2017–18 (e.g., Running Start, Career and Technical Education courses that fulfill ELA or mathematics requirements, College in the High School). Availability of these options will vary by district. Students may be required to achieve a certain letter grade or GPA to earn or have the option to earn college credit, as determined by the regionally accredited institution of higher education. <strong>To be considered “dual credit”, a course must satisfy the following three criteria:</strong> 1. It generates high school credit toward graduation.</td>
</tr>
</tbody>
</table>
2. It is articulated with, or could directly result in, college credit (100 level or above) from a regionally accredited institution of higher learning.

3. According to the respective regionally accredited institution of higher education, it is classified as an “English” or “Mathematics” course (i.e. ENGL 101, MATH 107), or it fulfills an English/Communications or Mathematics/Quantitative requirement as verified in the student’s High School and Beyond Plan.

STUDENTS WITH DISABILITIES: IEP teams should work with the school guidance counselor, career specialist, etc., to identify appropriate dual credit course options that align with the student’s High School and Beyond Plan and IEP transition plan. The IEP team should identify the necessary specially designed instruction, related services, accommodations, modifications, and supplementary aids and services needed by the student in order to participate in a dual credit course option. These may need to be documented in the IEP.

Schools and IEP teams need to be familiar with the requirements of any dual credit courses that would affect special education requirements. For example, two sample questions and answers from the Running Start FAQ on the OSPI website provide the following information:

- A student in need of accommodations in a Running Start course is responsible to request any necessary accommodations from their college directly. The student should contact the college’s disability services office well in advance of any published deadlines to make the request. The college may require documentation in support of a request for accommodations.

- School districts are responsible for providing the services outlined in the IEP and should work with the college to ensure that student’s needs are being met, including, where appropriate, entering into an interagency agreement to assure that each agency is complying with its respective duties to provide appropriate accommodations to an eligible student under state and federal law. Districts
<table>
<thead>
<tr>
<th>CAA Assessment Graduation Alternatives</th>
<th>Grade</th>
<th>Information</th>
</tr>
</thead>
</table>
| Locally Administered Assessment (LAA) tied to a Locally Determined Course (LDC) for students enrolled during or after 2018–19 | 11, 12 | Districts have the option of adding these alternatives; these options are not available in every school district. For school year 2018–19, there will be two options for approved Locally Administered Assessments (LAA) tied to Locally Determined Courses (LDC):  
- Passage of an ELA or mathematics Bridge to College course. These high school transition courses are approved locally determined course/locally administered assessment alternatives effective 2018–19. Bridge to College Mathematics and English Language Arts are designed for seniors. For high school graduation purposes, the student must pass and earn credit in the course.  
- Collections of Evidence - Local (COE Local). Many schools have developed courses to support students to work on their Collections of Evidence (COE) in ELA and mathematics. Although the state-level COE alternative was discontinued with the passage of ESHB 2224, the COE-Local alternative is intended to leverage the courses already developed in districts, as well as the materials (COE tasks) that were used across the state. COE-Local LDCs will need to be credit-bearing classes aligned with state standards and taught during the regular school day by certificated teachers. |

**STUDENTS WITH DISABILITIES**: IEP teams should work with the school guidance counselor, career specialist, etc., to identify an appropriate LDC option(s) that aligns with the student’s High School and Beyond Plan and IEP transition plan. The IEP team should identify the necessary specially designed instruction, related services, accommodations, modifications, and supplementary aids and services needed by the student in order to participate in a LDC and LAA.
Students may use scores on college admissions (i.e., ACT®, ACT® with Writing, SAT®, and SAT® with Essay) and specified Advanced Placement (AP) or International Baccalaureate (IB) tests, to show they possess the knowledge and skills expected of high school graduates.

**STUDENTS WITH DISABILITIES:** The school counselor or other responsible school/district professional should work with the IEP team (including the student and family) regarding accommodations and documentation needed by the student to participate in the specific assessment. See accommodation information at the following:

<table>
<thead>
<tr>
<th>Test</th>
<th>Accommodations may include, but are limited to:</th>
<th>Possible Documentation</th>
</tr>
</thead>
</table>
| ACT®  | • 50% Time extension  
      • Self-paced within time allowed  
      • Multiple days  
      • Large Print  
      • Braille  
      • Audio test format  
      • Reader  
      • Flexible setting  
      • Computer Accommodation | • Application  
                                 | • IEP  
                                 | • Supporting documentation may be requested (e.g., physician note, information from student cumulative record, teacher survey) |
| SAT®  | • Extended time  
      • Extra/Extended Breaks  
      • Multiple days  
      • Large Print  
      • Braille  
      • Audio test format  
      • Reader | • Application  
                  | • IEP  
                  | • Supporting documentation may be requested (e.g., physician note, information from student cumulative record, teacher survey)  
<pre><code>              | • Parent/Student consent form |
</code></pre>
<table>
<thead>
<tr>
<th>CAA Assessment Graduation Alternatives</th>
<th>Grade</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Test</td>
<td></td>
<td>Accommodations may include, but are limited to:</td>
</tr>
<tr>
<td>AP®</td>
<td></td>
<td>Possible Documentation</td>
</tr>
<tr>
<td>IB®</td>
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<table>
<thead>
<tr>
<th>Grade</th>
<th>GPA Comparison</th>
</tr>
</thead>
<tbody>
<tr>
<td>11, 12</td>
<td>GPA Comparison is a method to help establish if a student possesses the skills and knowledge expected of a high school graduate by comparing the student's grades (in an applicable content area) to those of other students in his/her comparison cohort. The comparison cohort is comprised of students who have taken the same classes, in the same learning environment, during the same time-period as the target student, but who met the performance standard on the applicable state assessment on which the target student did not. To attempt a GPA comparison, a cohort of six (6) or more students must be established, the target student must have a cumulative</td>
</tr>
<tr>
<td>CAA Assessment Graduation Alternatives</td>
<td>Grade</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>grade point average ≥ 3.2, and the target student must have completed at least two (2) credits of coursework applicable for graduation credit in the given content area.</td>
<td></td>
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</tbody>
</table>

**STUDENTS WITH DISABILITIES:** The GPA Comparison option is available for students participating in special education courses in a specific content area. The same requirements for establishing a cohort and the target student apply.

<table>
<thead>
<tr>
<th>CIA Assessment Graduation Alternatives</th>
<th>Grade</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Students not passing on their first attempt at the state ELA and mathematics assessments, or one of the state approved assessment graduation alternatives for a CAA, may access state approved Assessment Graduation Alternatives for a CIA.</td>
<td>11, 12</td>
<td>The eligibility criteria to access one of the Assessment Graduation Alternatives for a CIA are the same as those for accessing the alternatives for a CAA (see above), with the additional requirement that the student with a disability is eligible under IDEA and has an IEP. The student’s IEP team will make the determination as to which assessment/alternative is appropriate for the student-- based on the student’s learner characteristics and taking into consideration a student’s Present Levels of Academic And Functional Performance (PLAAFP), post-secondary goals, and previous testing history. <strong>Before selecting a CIA Assessment Graduation Alternative, the IEP team should consider whether any of the CAA Assessment Graduation Alternatives are appropriate.</strong></td>
</tr>
</tbody>
</table>

- **CIA Cut Score (formerly known as Basic/L2)** on the Regular On-Grade Smarter Balanced assessment | 11, 12 | There are some instances where an IEP team determines that the CIA Cut Score is the most appropriate method for a student to fulfill his or her assessment graduation requirement after a student has taken an accountability assessment or other approved state assessments. In these cases, a student’s IEP team may determine a student’s passing score as the CIA Cut Score, established within the Level 2 score range on the state mathematics or ELA assessment. The CIA Cut Score cannot be used for meeting standard in district federal accountability reporting, but can be used to fulfill state |
### CIA Assessment Graduation Alternatives

<table>
<thead>
<tr>
<th>Grade</th>
<th>Information</th>
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<tbody>
<tr>
<td></td>
<td>assessment graduation requirements to earn a CIA. District Assessment Coordinators can change the assessment type to CIA Cut Score for a past test administration in the CAA/CIA database by following the <a href="#">Retro-Basic: instructions</a>.</td>
</tr>
<tr>
<td></td>
<td><strong>Off-Grade Level Assessment (OGL)</strong> on Smarter Balanced ELA, mathematics, or WA-AIM (alternate assessment)</td>
</tr>
<tr>
<td>11, 12</td>
<td>The OGL assessment is an approved alternative to fulfill a high school student’s assessment graduation requirement towards a Certificate of Individual Achievement (CIA), but does not substitute for the on-grade level accountability assessment (Math and ELA Smarter Balanced assessment in spring of 10th grade). High School students may take the regular or alternate assessment at an elementary or middle school grade level to meet their graduation requirement, if specified in their IEP, after participating in the on grade level assessment. Off-grade level testing is not an option for students in grades 3-8. Off-grade level testing with the regular assessment will utilize the Smarter Balanced assessment system for ELA and mathematics. Off-grade level testing with the alternate assessment will use the WA-AIM for all content areas.</td>
</tr>
<tr>
<td></td>
<td><strong>Locally Determined Assessment (LDA)</strong></td>
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</table>
| 11, 12| An LDA is a series of state-prescribed assessments that can be selected and administered at the local school level. They are available in the content areas of mathematics and ELA (comprised of a reading LDA + writing LDA). IEP teams can decide to apply scores from one of several approved published achievement tests that are administered at the local level. The student’s IEP team must determine the most appropriate test for the student and document the information in the IEP. Current achievement tests approved as LDAs for ELA and mathematics include:  
  - Woodcock Johnson Achievement Test, 3rd or 4th Edition (WJAT-III or IV)  
  - Wechsler Individual Achievement Test, 2nd or 3rd Edition (WIAT-II or III)  
  - Kaufman Test of Educational Achievement, 2nd or 3rd Edition (KTEA-II or III) |
Scores from an LDA can be those from a test administered during the student’s 11th or 12th grade year. The scores can be from one of the approved tests that was:

- administered as part of a student’s comprehensive IDEA eligibility evaluation if:
  - the eligibility evaluation was conducted while the student was in 11th or 12th grade;
  - the scores are not more than three years old from the time of submission, and
  - the IEP team determines the test scores are still representative of the student current performance.

- individually administered by a qualified school staff member as an Assessment Graduation Alternative and the district:
  - obtains parent consent to administer the individual standardized test;
  - provide information to the parent regarding the student’s test scores and whether the scores meet or exceed the grade equivalency score for the appropriate test to qualify for submission to OSPI as an Assessment Graduation Alternative.

### Assessment Waivers

<table>
<thead>
<tr>
<th>Assessment Waivers</th>
<th>Grades</th>
<th>Information</th>
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</table>
| **Out of State Transfer Waiver** | 11, 12 | Students who transfer into a Washington public school from out of state, out of country or from an in-state non-public school setting (private or home school) may be eligible to access the assessment graduation alternatives in all content areas without first taking a state exam. The student may apply to receive a waiver for the assessment graduation requirement if the student has previously passed another state’s high school exit or accountability examination as approved by OSPI.

The waiver does not grant the student a Certificate of Academic Achievement (CAA) or Certificate of Individual Achievement (CIA). A student who is approved for an Out of State waiver may choose to pursue a CAA or CIA through meeting Washington's
### Assessment Waivers

<table>
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<tr>
<td></td>
<td>assessment graduation requirements via the standard state assessment or another assessment graduation alternative. <em>Students who have met or exceeded the Washington state graduation cut score on the mathematics or ELA Smarter Balanced assessment from another state can use their scores to earn a CAA or CIA.</em></td>
</tr>
</tbody>
</table>

### For transfer students with disabilities with IEPs

Eligible transfer students who also receive special education services have additional means for applying for an OOS waiver. They may pursue an Expanded OOS waiver if:

- They enroll in a WA school with another state's approved assessment (eligible for use in accountability or exit exam purposes), having met or exceeded that state's comparable performance level to Washington's CIA Cut Score.
- They enroll in a WA school having met or exceeded the CIA Cut Score set by Washington on a common assessment (Smarter Balanced assessment in ELA or mathematics).
- For students with significant cognitive disabilities, they met standard in another state's Alternate Assessment used for that state's federal accountability assessment.

### Special, Unavoidable Circumstance Appeal (SUCA)

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<th>Grades</th>
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| 11, 12 | Students in their senior year (or junior year under a specific circumstance where an educator has caused a testing irregularity) who have been unable to demonstrate their skills and knowledge on the state accountability assessment or another assessment graduation alternative because of special, unavoidable circumstances may appeal to the Superintendent of Public Instruction to waive a specific content area's assessment graduation requirement. The waiver does not grant the student a Certificate of Academic Achievement (CAA) or Certificate of Individual Achievement (CIA). WAC 392-501-601 defines a special, unavoidable circumstance to include the following:
- Not being able to take or complete an assessment because of:
  - The death of a parent, guardian, sibling, or grandparent; |
<table>
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<tr>
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<tbody>
<tr>
<td>• An unexpected and/or severe medical condition. The condition must be documented</td>
<td>12</td>
<td>by a medical professional and included with the application, within the constraints of the Health Insurance Portability and Accountability Act (HIPAA); or</td>
</tr>
<tr>
<td>• Another unavoidable event of a similarly compelling magnitude that district</td>
<td></td>
<td>administrators determine prevented the student from sitting for or completing the assessment.</td>
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<td>• A major irregularity in the administration of the assessment;</td>
<td></td>
<td>• Loss of the assessment material;</td>
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<tr>
<td>• Failure to receive an accommodation during administration of the assessment</td>
<td></td>
<td>• Failure to receive an accommodation during administration of the assessment that was documented in the student’s IEP or in a plan required</td>
</tr>
<tr>
<td>• For students enrolled in the state transitional bilingual instructional program,</td>
<td></td>
<td>under Section 504 of the Rehabilitation Act of 1973;</td>
</tr>
<tr>
<td>• Students who transfer from an out-of-state, out-of-country, or nonpublic</td>
<td></td>
<td>• For students enrolled in the state transitional bilingual instructional program, failure to receive an accommodation during the administration of</td>
</tr>
<tr>
<td>(including home-school environment) school to a Washington public school in the</td>
<td></td>
<td>the assessment that was scheduled to be provided by the school district;</td>
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<tr>
<td>twelfth-grade year after the end of the first term or February 15th, whichever is</td>
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<tr>
<td>1st.</td>
<td></td>
<td>whichever is first.</td>
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</tbody>
</table>

**CAA/CIA Expedited Assessment Appeals Waiver** including guidance for Other Pathway

*Engrossed Substitute House Bill (ESHB) 2224, signed into law July 7, 2017*, added a process for an expedited appeal process for waiving specific assessment graduation requirements for eligible students in the classes of 2014 to 2018. An Expedited Assessment Appeals (EAA) Waiver can be approved only if an eligible student has attempted at least one Assessment Graduation Alternative and can demonstrate the necessary skills and knowledge to meet the high school graduation standard and to successfully achieve his or her college or career goals, as outlined in the bill. The waiver does not grant the student a Certificate of Academic Achievement (CAA) or Certificate of Individual Achievement (CIA).
Pathways for demonstrating include, but are not limited to:
(A) Successful completion of a college level class in the relevant subject area
(B) Admission to a higher education institution or career preparation program
(C) Award of a scholarship for higher education
(D) Enlistment in a branch of the military
(E) Other: Because the pathways for demonstrating are “not limited to” those listed in the law (options A-D), OSPI allows students to submit descriptions using an “other” pathway to demonstrate these skills and knowledge. For more information, please see OSPI’s EAA “Other” Pathway Guidance Webpage.

Other Pathway Guidance:
The “other” pathway selection allows a district to describe how an eligible student has demonstrated the necessary skills and knowledge through a pathway other than those more explicitly defined in the law. Supporting documentation and/or OSPI worksheets may be used by districts to augment a student’s “other” pathway submission.

To assist districts in providing OSPI with adequate “other” pathway descriptions, OSPI has provided worksheets (see “Worksheets to Support ‘other’ Pathway Descriptions” section) developed to help districts identify:
• how the student has demonstrated the necessary skills and knowledge to meet the high school ELA and/or mathematics standards. *Having passed required content area courses is a prerequisite for this appeal-AND-
• how the student’s skills and knowledge contribute to the successful achievement of the college or career goals established in his or her high school and beyond plan.

In addition to any of the worksheets provided by OSPI, a district may choose to submit additional documentation relevant to verifying the student’s skills and knowledge in the given content area(s). This may include test score reports from
<table>
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<tbody>
<tr>
<td></td>
<td></td>
<td>tests that show a comparable level of skill and knowledge as those required to pass state exams, or post-secondary certificates/training records relating to the student's progression towards achievement of their college and career goals, etc.</td>
</tr>
<tr>
<td><strong>WA-AIM Engagement Rubric</strong></td>
<td>11, 12</td>
<td>The WA-AIM Engagement Rubric replaces the process formerly known as the Awareness Waiver. Students who meet some or all of the Engagement Rubric criteria will count as participants in federal and state accountability reporting and will have an Awareness Waiver automatically applied to the state assessment graduation requirement. Engagement Rubrics are submitted through the WA-AIM Data Collection Platform.</td>
</tr>
</tbody>
</table>
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