



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**

*Class of 2025  
Graduation Toolkit:  
Frequently Asked Questions  
and Answers*

**2024**

# GRADUATION TOOLKIT: CLASS OF 2025

Frequently Asked Questions and Answers

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# BACKGROUND

This Graduation Toolkit Frequently Asked Questions (FAQ) is a companion resource that was developed in partnership with the Washington State Board of Education (SBE) to provide more detailed guidance on the implementation of graduation requirements detailed in the [Graduation Toolkit](#) for each graduating class.

Much of this FAQ provides additional information supporting unique student populations' progress toward graduation, especially students with disabilities and multilingual/English learners. However, the information and resources shared are also beneficial practices for all students, including those who are highly mobile; students experiencing home, financial, or other insecurity; and students in foster care. Ultimately, this FAQ is intended to support staff by ensuring all learners make meaningful progress toward graduation requirements and preparing for their postsecondary goals.

At the beginning of each section within this FAQ, the most commonly used statewide resources, guidance, and other information will be shared to increase access to available support. The questions in each section are designed to provide practical and detailed guidance that complements what is in the Office of Superintendent of Public Instructions (OSPI) Graduation Toolkit.

# 1. DEVELOP A HIGH SCHOOL AND BEYOND PLAN (HSBP)

## 1A. What guidance and resources are available on the topics of HSBPs?

### Guidance/Bulletins

- [Guidelines for Aligning HSBPs and Individualized Education Program \(IEP\) Transition Plans Document Suite](#)
  - Case Study of a 10th grader using a Career & Technical Education (CTE) Course Sequence Graduation Pathway: [Document](#) | [Webinar Recording](#) | [Slides](#)
  - Case Study of an Adult Student using the Washington Access to Instruction and Measurement (WA-AIM) Graduation Pathway: [Document](#) | [Webinar Recording](#) | [Slides](#)

### Webinars/Professional Development

- HSBP 101: Increasing Engagement with High School and Beyond Planning [Webinar Recording](#) | [Slides](#)
- HSBP 201: Aligning HSBP and IEP Transition Plans [Webinar Recording](#) | [Slides](#)
- Washington Student Achievement Council Webinar: Supporting Students' Transition: Aligning HSBP's and IEP Transition Plans [Webinar Recording](#)

### Webpages

- [OSPI Graduation Requirements](#)
- [SBE High School and Beyond Plan](#)
- [OSPI \(Special Education\) Secondary Transition](#)

### Other Resources

- [Writing Effective Transition Plans, a self-paced training by the Center for Change in Transition Services \(CCTS\)](#), includes a wealth of information on this topic. Module 9 of this course is specific to HSBP alignment and walks through the HSBP/IEP Transition Plan alignment of Kaleb ([The case study of an adult student using the WA-AIM graduation pathway who has significant disabilities.](#))
- [HSBP downloadable and writable template for class of 2023 and beyond](#) (updated November 2022).
- [Class of 2023 Graduation Toolkit](#), includes detailed information on HSBP development and required components.
- [Career Guidance Washington lesson plans](#) 30 lessons per year, grades 6–12.
- [My Next Move](#), is a search engine that helps students find and explore careers based on keywords (e.g., 'customer service' or 'helping others') that describe their dream job.
- [Washington Administrative Code \(WAC\) 180-51-220](#) HSBPs.

## **1B. Does the HSBP process need to be the same for all students? Is there an alternative HSBP for students with an IEP?**

Per WAC 180-51-220 (4), "For a student with an Individualized Education Program (IEP), the student's IEP and high school and beyond plans must align. Students with an IEP transition plan, which begins during the school year in which they turn 16, may use their transition plan to support their high school and beyond plan, but not as a replacement. The process for developing and updating the student's high school and beyond plans must be similar to and conducted with similar school personnel as for all other students."

It would be against the intention of WAC 180-51-220 and the best interest of students to have a separate HSBP process for students who receive special education services that are exclusively led by special education staff who likely do not have the same expertise as the staff supporting high school and beyond planning for all students.

The HSBP is a general education graduation requirement for all students that can be customized to support students' needs and goals. There is no alternative to the HSBP nor any way to waive or decrease the required core components for the HSBP. Districts must provide all students access to an online platform and be encouraged to customize and differentiate the process to be inclusive of all students in meeting their needs and supporting them in their goals and planning.

Unlike the IEP Transition Plan, which is adult-generated, the HSBP is a student-driven, student-oriented document to support students in planning and preparing for their post-secondary goals. The student can participate in this process in various ways, even if they cannot use the district's chosen online platform or process the tasks independently. For example, can the student answer questions about their interests and goals by selecting pictures to engage in the process? The [T-folio](#) developed by the CCTS has a variety of lessons that could be used and differentiated with pictures, videos, and other supports.

What an HSBP looks like for two students based on their strengths, preferences, interests, post-secondary goals, and preparation needs will likely vary. You will notice this student customization in the two HSBP and IEP Transition Plan Case Studies found in Appendix B of [Guidelines for Aligning High School and Beyond Plans and IEP Transition Plans](#). See question 1A in "Develop a High School and Beyond Plan" for case study resources.

## **1C. Do CTE course equivalencies need to be documented in the HSBP?**

Per [Revised Code of Washington \(RCW\) 28A.230.097](#), "The high school or school district shall also issue and record course completion certificates demonstrating that the career and technical courses were completed as needed for industry certification, college credit, or pre-apprenticeship, as applicable. The certificate shall be part of the student's high school and beyond plan."

Districts should use the platform or document feature that is the most accessible to students to document this certificate information. Students should have access to their certificates upon exiting school. This may include uploading a document to an online platform, adding a file to a USB, including a copy in a physical folder, etc. Two optional OSPI created CTE course equivalency certificate templates are available:

- A [Local Course Equivalency Certificate Template](#) is to be used for CTE course equivalencies that are approved at the local level.
- A [State Course Equivalency Certificate Template](#) is to be used for CTE course equivalencies that are aligned to a state-approved framework.

To learn more, see the Statewide Approved Course Equivalencies list posted on the [Statewide Course Equivalencies webpage](#).

## **1D. Are there any HSBP platforms or tools that are already differentiated, with lesson plans or curriculum that include pictures, to support students who may need substantial adaptation to engage in the HSBP process?**

Each online platform will have unique considerations for differentiation and access; the ability to differentiate and provide options for completing the required components is an important factor in a district's selection and adoption of its HSBP platform and/or tool.

For districts seeking additional resources to support differentiation with the HSBP development process, the [T-Folio](#) is a free transition portfolio tool developed by CCTS that could supplement a district's HSBP development process for students who may need additional support to engage and make meaningful processes in the standard online platform and/or tool. This resource has many tools for students who may require support accessing the required components differently.

Additionally, collaboration may be needed with special education staff and/or Educational Staff Associates who are well-versed in supporting educators with differentiating content to support student engagement and progress in activities. Individualization is required when determining what prompts a student may need to succeed in each task. Providing a set of resources with embedded prompts (for example, words and pictures) can be a great Universal Design for Learning (UDL) and differentiation strategy for all students to build from.

The [HSBP and Aligned IEP for an Adult Student using the WA-AIM State Assessment as a Graduation Pathway case study](#) has some examples of some inventories and activities that are more picture-based. A special educator could support with adapting this tool to fit the student's abilities, especially when building their résumé, as needed:



**Figure 1: Strengths of self-assessment activity**

10/2019

**Strengths Assessment 1**

*Directions: Look at the list of strengths below. Circle all the strengths you think apply to you!*

**List of Strengths:**

Friendly	Honest	Creative
Postive attitude	Likes working	Good hygiene
Flexible	Following directions	Polite
Patient	On time	Confident
Good listener	Quick learner	Organized

**Source:** HSBP and Aligned IEP for an Adult Student using the WA-AIM State Assessment as a Graduation Pathway, November 2020.

The activity on page 17 of this case study includes an example of how special educators and English Language Advocates can support the differentiation of interest inventories and other HSBP activities. Also, depending on a student’s support needs, activities could include individual tactile pictures that are cut out, a worksheet with pictures, or interactive questions as part of a technology device, like an iPad.

**Figure 2: Example with symbolic or simple pictures**

**Where do you want to live?**

with my parents	with my sister	with my brother	with my friends	apartment	group home	my home
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**What do you want to do?**

take classes	go on a trip	get married	have a family	have a job	get paid for working	hang out with friends	spend time with family
go to the movies	go for walks	be in a band	dance	sports	be outside	see a game	go camping
go shopping	go swimming						

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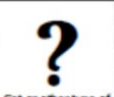


**Source:** HSBP and Aligned IEP for an Adult Student using the WA-AIM State Assessment as a Graduation Pathway, November 2020.

**Figure 3: Example with real photos**





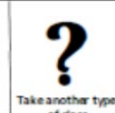
Setting Goals Worksheet

**Name: Kaleb George** 12-17-19

1. My specific goal for employment is:

 Get a paid job in an office	 Get a paid job in a grocery store	 Get another type of paid job	 Practice typing my resume	 Practice job skills before I apply for a job
--	--	---	---	---

2. My specific goal for education is:

 Go to a college to take math and reading classes	 Take a baking class	 Take singing classes	 Take a swimming class	 Take another type of class
---	--	---	---	---

3. I would like to meet my goals in:

1 week	1 month	1 year	Other
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**Source:** HSBP and Aligned IEP for an Adult Student using the WA-AIM State Assessment as a Graduation Pathway, November 2020.

## 1E. How can we support all students to access a career interest inventory?

The age-appropriate transition assessments, part of a student’s IEP Transition Plan for all students aged 16 and older, are an IEP team decision based on the student’s needs and goals. The intention is that the HSBP and IEP Transition plans are aligned, coordinated, and able to build off each other, but what is required for each plan may not be the same.

The HSBP begins by 7th grade and includes completing a career and interest inventory. Depending on the online HSBP platform, the career interest inventory could assess a student’s aptitudes, personality, interests, etc. Similarly, the IEP transition assessment must address the student’s strengths, preferences, interests, and needs (the acronym “SPIN” can serve as a helpful prompt for IEP teams, Multilingual (ML) or English Language Development (ELD) teachers, and other staff conducting this work).

Completing a career interest inventory in 7th grade as part of the HSBP process is intended to inform course selection for 8th and/or 9th grade. Many schools may have embedded career and interest inventory tools as part of their online platform that can meet the needs of most students. Some students may benefit from a shortened or simplified career survey, such as the “My Next Move” search engine referenced at the beginning of this section, which can support students’ career exploration based on key search words of what is important to them. Regardless of what career and interest inventory is used for a student, it must be designed to help them make targeted career choices based on their skills and interests.

## **1F. How are the requirements for the age-appropriate transition assessment for the IEP Transition Plan alike and different from the requirements for the career and interest inventory component of the HSBP?**

The initial career interest inventory can be referenced and used in the IEP Transition Plan age-appropriate transition assessment, which begins no later than age 16. However, it is possible that the student's interests and goals have changed, and completion of the transition assessment may help further clarify future course decisions in preparation for the student's post-secondary goals.

Sources of career and interest inventories and transition assessment information may be from formal measures (such as interest or aptitude tests) or informal measures (such as student or family interviews, observations of the student, etc.). This information may also be found in other places, such as the student's current evaluation report, other sections of the IEP (such as the present levels), or the student's HSBP.

- More information about age-appropriate transition assessments is found on the [Special Education Transition Services webpage](#)
- You see an example of an age-appropriate transition assessment illuminated on page 24 of [Case Study of an Adult Student using the WA-AIM Graduation Pathway](#)

## 2. GRADUATION PATHWAYS

### 2A. What guidance and resources are available on the topics of graduation pathways for all students?

#### Guidance/Bulletins

- The [Class of 2023 Graduation Toolkit](#) includes detailed information on each state-approved Graduation Pathway option, including requirements specific to each graduating class.

#### Webinars/Professional Development

- Specifically for Open Doors Youth Reengagement programs, OSPI facilitated a [Graduation 101: Requirements, Waivers and Pathways webinar](#) that includes information on Graduation Pathways in an alternative setting.

#### Webpages

- [OSPI's Graduation Pathways webpage](#) includes basic information about the options and contact information for staff who can provide technical assistance related to the graduation pathways database, in which staff must reflect students' completion of their Graduation Pathway.
- The SBE's [Graduation Pathways](#) webpage describes each pathway. It provides information on scores needed to meet standards on test-based pathways, including the Armed Services Vocational Aptitude Battery (ASVAB) score, which is updated by the Board at least annually.

#### Other Resources

- The [Class of 2024 Graduation Pathways Quick Reference](#) includes basic requirements for all Graduation Pathways.
- [WAC 280-51-230](#) Graduation Pathway Options

#### Performance-based pathway option

- The SBE will develop rules to implement this new pathway option, with final rules likely to be adopted in December 2024.
- Additional information about this new pathway option is posted on the SBE [Performance-based Pathway Webpage](#).

### 2B. How are new graduation pathway options added?

The addition of new graduation pathways falls under the purview of the Legislature. The SBE was authorized to study graduation pathways and make recommendations to the Legislature for modification of current pathways or additional pathways if needed. The Board submitted a [report of recommendations to the Legislature](#). For questions on the process used to inform the addition of new pathways, contact [sbe@k12.wa.us](mailto:sbe@k12.wa.us).

## 2C. What are the necessary steps to build and support a CTE Sequence Graduation Pathway?

A district should develop CTE Sequence Graduation Pathways from the CTE courses and Programs of Study offered in the district that reflect the career and educational goals of the student body and the labor market demand. They should not be designed specifically for an individual student. Resources for developing CTE Programs of Study can be found in the [CTE Programs of Study document](#). Program of Study examples and templates are available on the [CTE Program of Study and Career Clusters](#) webpage.

A CTE Sequence Graduation Pathway can include multiple related occupations and post-secondary options. Students using this graduation pathway to meet graduation requirements should have HSBP goals that directly align with the careers available within the Career Pathway.

Students with special needs using the CTE Sequence Graduation Pathway to meet graduation requirements should also have alignment between their transition goals and HSBP goals that reflect the Career Pathway of their CTE Sequence Graduation Pathway. Information regarding Career Pathways that align with specific Career Clusters is available on the [Career Clusters document](#).

Steps to developing a CTE course sequence into a CTE Sequence Graduation Pathway should include the following:

- Identify 2.0 credits of CTE courses within a particular career program area leading to a specific career or cross-cutting career clusters with application approval by OSPI for local offer.
- Within the CTE course sequence, it is imperative that one course incorporates college credit (through CTE Dual Credit articulation, Advanced Placement, or taking an approved vocational course in a Workforce or Professional/Technical program through Running Start) and/or provides a pathway to attain an Industry Recognized Credential, either in the high school or Skill Center course, or through further postsecondary education or training.
- The sequence must be technically intensive and rigorous, leading to workforce entry, registered apprenticeship, or related postsecondary education. Core Plus programs that result in a Core Plus Credential also meet these requirements.
  - If the CTE courses in the sequence are within the same CTE Program Area (Agriculture, Business & Marketing, Family & Consumer Sciences, Health Sciences, Skilled & Technical Sciences, or STEM), the CTE Sequence Graduation Pathway can be approved in accordance with the district's policy for approval.
  - If the CTE courses in the sequence are in two different CTE Program Areas, the district will first need to achieve local approval of the pathway (local school board or designee or local CTE advisory committee) and then apply to OSPI for approval of the CTE Sequence Graduation Pathway through the Graduation Alternatives application in the Education Data System.
  - Career Choices (limited to 1.0 credit), Applied Math, or Careers in Education are courses that may align with any of the CTE Programs. When these courses are used as the additional CTE Program Area within the CTE course sequence, additional approval from OSPI is not required.

## 2D. What graduation pathways are available for students with significant cognitive disabilities?

Students with IEPs can access any options available to all students to meet the graduation pathway requirement and demonstrate preparation for their post-secondary goals. The WA-AIM is still a graduation pathway option for students with significant cognitive challenges.

Alternative programs (such as transition services or work-based learning programs) cannot be used to satisfy or replace the graduation pathway requirement, even if the IEP determines these programs are needed for a student's plan. If determined as needed, these programs would be in addition to the graduation pathway requirement and would not replace it.

## 2E. Does participation in the WA-AIM assessment through the engagement rubric fulfill the graduation pathway requirement?

Yes, obtaining a [cut score on the WA-AIM](#) is still a graduation pathway option for students if the WA-AIM is determined to be the appropriate assessment and graduation pathway option by an IEP team (a student's graduation pathway should align with their post-secondary goals as identified in their IEP transition plan and HSBP). The WA-AIM is designed for approximately 1% of students with the most significant cognitive disabilities and must not be used as the default pathway for students with disabilities who are not able to achieve the cut score specified by the SBE for the Smarter Balanced Assessment in math and/or English language arts (ELA).

**IMPORTANT NOTE:** The [Guidelines for State Accountability Assessments](#) document, especially the flow chart on page 14 of that document, is a helpful resource to support IEP teams in determining if the WA-AIM is the appropriate assessment option for meeting a student's graduation pathway requirement.

The engagement rubric for the WA-AIM will continue to be used with all tested grade levels and cohorts as part of federal and state accountability testing.

**Figure 4: Guidance on the engagement rubric and awareness waivers**

Class of 2021 and Earlier	Class of 2022 and Beyond
<ul style="list-style-type: none"> <li>The use of an engagement rubric automatically resulted in an Awareness Waiver (<a href="#">WAC 392-501-705</a>) waiving the assessment requirement of the Certificate of Individual Achievement.</li> </ul>	<ul style="list-style-type: none"> <li>The awareness waiver is discontinued.</li> <li>The engagement rubric will continue to be used with all tested grade levels and cohorts as part of the <a href="#">federal and state accountability testing</a>.</li> <li>Students participating in the WA-AIM through the engagement rubric may need additional support to satisfy the <a href="#">graduation pathway</a> requirement.</li> <li>Meeting the <a href="#">graduation cut scores</a> through the standard administration of the WA-AIM will continue to serve as a potential pathway option.</li> </ul>

**Source:** Special Education Monthly Update, March 2021.

# 3. MEET STATE AND LOCAL SUBJECT AREA REQUIREMENTS

## 3A. What guidance and resources are available on the topics of required courses and credits for all students?

### Guidance/Bulletins

- The [Class of 2023 Graduation Toolkit](#) includes detailed information on each of the required courses and the number of credits needed for graduation, as well as available flexibility with meeting specific course requirements.
- [OSPI's On-Time Grade Level Progression guidance](#).
- [OSPI's ML Education Newcomer Guidance](#) has been recently updated to include suggestions and resources that support staff with evaluating records and determining course placement for refugees and students coming from other countries.

### Webinars/Professional Development

- [Supporting Newcomers & Refugees Webinar Recording](#) and [Slides \(PDF\)](#).

### Webpages

- The [SBE Graduation Requirements webpage](#) lists all the specific course and credit requirements for each graduation cohort through the Class of 2024.
- The SBE's [Emergency Waiver Program webpage](#) includes information about this year's Graduation Requirement Emergency Waiver (GREW) option to waive up to 1.0 credit maximum waiver before the GREW phases out.
- The SBE's [High School Credits FAQ webpage](#) includes information that can provide flexibility for students in meeting specific course and credit requirements.
- The [Washington State School Directors' Association \(WSSDA\) Featured Policies webpage](#) posts model policies and procedures for mastery-based crediting (see the "2000 Series" section on the webpage).
  - **IMPORTANT NOTE:** Districts must have a policy in place to grant mastery-based credits (per [WAC 180-51-050](#) and [180-51-051](#)).

### Other Resources

- The SBE's [infographic on credit requirements](#) is a great visual of what students need to complete.
- The SBE's [statewide rules related to granting mastery-based credit](#) also support flexibility for students in meeting specific course and credit requirements.
- [WAC 180-51-210](#) state subject and credit requirements for high school graduation.

### 3B. What additional flexibility do school teams have in supporting students to obtain core subject credit requirements?

The following guidance is available to help local systems understand what flexibility exists when supporting students to obtain core subject credit requirements:

- Districts make local determinations as to what courses meet which graduation requirements ([WAC 180-51-025](#)). Districts also determine locally how much credit to award for courses based on state learning standards. Districts may establish local learning standards for subjects that do not have state learning standards (WAC 180-51-050).
- Academic learning standards apply to all courses, and the required credits for graduation are the same for all students. The required courses and credits are specified by the graduation cohort, with some flexibility based on a student's post-secondary goals. The graduation requirements are determined by the year the student enters 9th grade and remain the same regardless of whether the student graduates in four years or takes less or more time.
- Instruction for all courses is expected to utilize principles of differentiation and UDL to support students with varying needs to engage and make progress in mastering or demonstrating proficiency with the content and learning standards.
- SBE has a helpful [graduation-by-cohort](#) that unpacks graduation requirements by graduation cohort. This includes further details for what counts as a credit area, what flexibility exists, and what requirements for those courses are found in the FAQ for each subject area. The FAQ, for example, contains a wealth of information on the requirements for each of the three credits.
- Districts can offer comparable content course substitutions to support students in obtaining graduation credits and subject area requirements. All decisions related to course substitutions meeting graduation credit requirements for students receiving special education services must align with [rules for granting graduation credits](#).
- Mastery-Based Credits are another method of awarding credit. Each district offering mastery-based crediting must have a written policy for awarding mastery-based credit:
  - Mastery Based crediting relates to assessments of knowledge and skills, often learned outside of the classroom, that align with the course content and state or local learning standards. Local policies must specify the methods allowable for a student to demonstrate mastery and qualify for mastery-based credit.
  - SBE rules for mastery-based crediting (WAC 180-51-051). Describe the procedure for granting mastery-based credit. When districts adopt a written policy for grant mastery-based credit, they should also adopt associated procedures that provide additional local details on their process for mastery-based credit (beyond what is specific in the sample [WSSDA model policies](#) and procedures).



### **3C. How can comparable content course substitutions provide flexibility to students who may need additional support to obtain core content credits to fulfill graduation requirements?**

As a starting place, schools and districts are expected to ensure that all courses offered utilize principles of differentiation and UDL to support students with various needs to engage and progress in the content and learning standards. As a reminder, flexibility in how students demonstrate mastery of learning standards can happen within any course and does not require a separate course to be developed. However, this can be an effective option to provide meaningful and exciting ways for all students to engage in required learning standards. For example, an English language arts (ELA) class can have students engaging in the same required reading material in a variety of formats (condensed text, graphic novel, or video) and then support the learners to progress in the learning standards together. Alternatively, a school or district could offer a Graphics Novel 1 course, for example, that could be co-taught by general and special educators to support students in learning an ELA learning standard.

For students who are also receiving special education services, state laws in [RCW 28A.155.045](#) and rules in [WAC 180-51-115](#) acknowledge the critical role of the IEP team in determining the most appropriate high school credit substitution and assessment options for a student.

“A student with an IEP must be provided with the needed accommodations to progress in the general curriculum toward meeting state and local graduation requirements. In limited circumstances, when determined necessary by the IEP team due to the unique needs resulting from the student's disability, a graduation credit and subject area requirement may be substituted with comparable content course work, as identified in the IEP team course of study and aligned to the student's HSBP.”

The intent behind WAC 180-51-115 is that when course substitution is determined to be necessary, IEP teams must only substitute courses that are similar in scope and content, and course substitutions should only occur in response to the unique needs that can arise from a student's disability. The academic learning standards apply to all students. Much like students who take the WA-AIM alternate assessment, it is the performance expectation that changes, not the content of the course. The instructors can reduce the breadth, depth, and/or complexity of performance of the standard, not whether the student has access to the content.

Two examples of comparable content course substitutions that could provide flexible, engaging, and rigorous credit options for all students are:

- A Construction Math course that offers Geometry credit as students will demonstrate learning of Geometry learning standards.
- A Graphics Novel 1 course that offers ELA credit as students will demonstrate learning of ELA learning standards.

With the shift to increased local data use and practices outlined in [House Bill \(HB\) 1599 \(2019\)](#), it is recommended that district special education teachers, administrators, and school counselors work together to determine as a district what meets the requirements around course substitution practices for a high school diploma. The current special education WAC and federal Individuals with

Disabilities Education Act laws charge districts with providing Free and Appropriate Public Education to students “designed to meet their unique needs and prepare them for further education, employment, and independent living,” this must continue to guide decisions locally.

To learn more about comparable content course substitutions, please review [Special Education Guidance on WAC 180-51-115](#) on page 8. To learn more about subject area credit practices requirements, please review the SBE Graduation Requirements webpage, which details credit requirements by graduation cohort with a FAQ by content area.

**IMPORTANT NOTE:** WAC 180-51-115 was revised in 2019–20 (effective January 13, 2020). Prior to this revision, under limited circumstances, credit and subject area graduation requirements could be waived for students with IEPs. The revised rule allows the flexibility noted above but no longer permits a waiver. As of **July 1, 2020**, all decisions about course substitutions for graduation credit requirements for students receiving special education services must align with the revised rules in WAC 180-51-115.

### **3D. If a student takes three years of the same math course, such as “modified algebra,” does this meet the required three credits of math for graduation?**

No, taking the same math course for multiple years would not satisfy the graduation requirement for math. All students must complete 1.0 credit each of Algebra 1 and Geometry or equivalent course(s), such as an Integrated Math course or CTE equivalency. The third math credit must align with the student’s postsecondary goals, as identified in their HSBP.

The SBE [Math FAQ](#) may help understand the math subject area requirements (question 12 directly addresses this) and may clarify flexibility in course offerings.

### **3E. How do students earn English credits in an English Learners program?**

ELA requirements are met through grade-level, standards-based courses. ELD courses do not generate ELA credit if they do not meet grade-level ELA standards. ELD courses generate elective credits.

Eligible Multilingual(ML)/English learners participating in sheltered or content-based ELA courses are learning grade-level, standards-based ELA content while developing their English language skills. These courses should be transcribed using the appropriate ELA course code, count towards the ELA graduation requirement, and may be designated as College Academic Distribution Requirement (CADR) for admission to Washington’s public baccalaureate institutions.

For eligible students in a Supportive Mainstream model, ELD services are most frequently offered as an ELD class that is in addition to their ELA class. These courses use the World-class Instructional Design and Assessment ELD standards and do not fulfill ELA graduation requirements. These courses should be coded using either 01008 (English as a Second Language) or 01992 (English Proficiency Development).

### **3F. How can schools best determine credits met and credits needed when official transcripts are missing or incomplete?**

Many recently arrived high school students are unable to provide official transcripts. There is no law stating that a district cannot accept unofficial documents. However, districts should ensure that unofficial documents are verified as authentic and accurately reflect the student’s academic history before their use. Districts should also state clearly in their policies and procedures if and how unofficial documents will be used.

If only unofficial, unverified transcripts are available, or if circumstances such as forced migration make it impossible for records to be provided at all, districts should consider adopting and implementing a mastery-based crediting (also known as competency-based) policy to reduce barriers to graduation. This policy should apply to all students.

### **3G. How can schools best determine course placement for students when transcripts and student records are missing or incomplete?**

New student schedules are based on prior academic experience and graduation requirements balanced by student interests and strengths. When records are unavailable, graduation year placement can be made in the age-appropriate grade level. If improper placement alignment is identified upon receiving formal records, locally determined district procedures for grade-level adjustment should be followed.

For core academic content, placement tests often rely on technical drawings and predictable formatting to increase accessibility. When possible, placement tests can also be made available in the student’s primary language to eliminate linguistic barriers. For placement purposes only, formal written tests or informal conversations to gauge proficiency and problem-solving processes can be used.

If students are eligible ML/English learners, placement in the appropriate ML education model and designated ELD is part of a student’s language development plan and must be determined by a certificated ELD teacher or language services case manager. See the [ML Education Policies and Practices Guide](#) for more information.

### **3H. What laws explain “excused from participation” in Physical Education?**

[RCW 28A.230.050](#) *Physical education in high schools.*

All high schools of the state shall emphasize the work of physical education and carry into effect all physical education requirements established by the rule of the superintendent of public instruction: Provided, that individual students may be excused from participating in physical education otherwise required under this section on account of physical disability, employment, or religious belief, or because of participation in directed athletics or military science and tactics or for other good cause.

[WAC 180-51-068](#) State subject and credit requirements for high school graduation.

Two health and physical education credits (.5 credit health; 1.5 credits physical education). Students may be excused from the participation requirement of physical education under RCW 28A.230.050. Such excused students shall be required to demonstrate competency/mastery in the knowledge portion of physical education in a district approved competency assessment that is aligned to Physical Education learning standards, in accordance with written district policy.

## 3I. How is a student excused from participating in Physical Education?

If the excusal is **physical activity-based**:

- When district policy allows, students excused from participation due to sports participation, military science, or “physically demanding” employment can receive credit for Physical Education. Sports participation could include Washington Interscholastic Activities Association sports, club sports (ultimate frisbee), or competitive sports outside the school. One “season” of a sport could be used for excusal from participation for up to .5 credits. These students shall be required to demonstrate competency/mastery in the knowledge portion of physical education in a district-approved competency assessment.

Student transcripts must be updated to reflect these credits using applicable designator/s like L for local competency tests or Z for non-instructional courses. Learn more about course indicators in the High School Transcript FAQ which is regularly revised and updated versions posted on OSPI’s High School Transcripts webpage.

- If a student is **excused** from participation in PE course(s), then up to 1.5 credits of PE earned through demonstration of competency/mastery, per written district policy (see WAC 180-51-051 for what the policy must include), must appear on the student’s transcript with the appropriate designation (the “Z – non-instructional course designator”), to indicate how the PE credits were earned.

If the excusal is **non-physical activity-based**:

- Students being excused for participation for religious belief, physical disability, or another “non-physical” good cause reason can be excused from participation in physical education in alignment with district policy.
- The excusal is reflected on the student’s transcript with a value of 0 credits. These students shall be required to demonstrate competency/mastery in the knowledge portion of physical education in a district-approved competency assessment, see first list item above.

“Other good cause” should not be used to excuse students seeking to avoid Physical Education classes. Schools and districts should offer flexible physical education classes to meet a diverse range of student interests. Districts should have a clear, written policy to clarify the basis for permitting students to be excused from physical education and transcribing such excusals, including what constitutes “other good cause.” Schools/districts may want to reexamine policies such as requiring students to change clothes to participate in Physical Education, etc. Best practice recommends that every high school student take a minimum .5 credit PE course in 9th or 10th grade.

### **3J. What is meant by “shall be required to demonstrate competency/mastery in the knowledge portion of physical education”?**

Districts can utilize OSPI-developed classroom-based [Physical Education assessments](#) or locally approved assessments for students excused from physical education to demonstrate competency in knowledge of physical education learning standards. For examples of locally developed assessments, consider seeking access to the Highline School District’s assessment.

### **3K. Can a student be excused from participation in Physical Education courses due to a disability?**

The practice of excusing students from PE due to disability, while permitted under RCW 28A.230.040, should only be considered after other alternatives have been fully explored. Physical education services must be made equally available to all students, including students with disabilities, unless the district does not provide physical education to students without disabilities in the same grades. If physical education is specially designed to meet the unique needs of a student with a disability and is set out in that student’s IEP, Adapted Physical Education aligned to [Washington state K–12 Physical Education Learning Standards](#) must be provided whether or not physical education is provided to other students in the district. To learn more about Adapted Physical Education and Inclusive Physical Education please review [Updated Guidance on Adapted Physical Education](#).

### **3L. Can the .5 health credit required for graduation be waived or excused?**

No. Completing a health education course or statewide course equivalency (Family Health,190003) and mastery of health education learning standards is required for graduation, and participation cannot be excused or waived.

## 4. HIGH SCHOOL TRANSCRIPTS

### 4A. What guidance and resources are available on the topics of interpreting transcripts?

#### Guidance/Bulletins

- OSPI's [High School Transcript FAQ](#).
- OSPI's ML Education [Newcomer Guidance \(including transcript evaluation for out-of-country records\)](#).
- OSPI's [On-Time Grade-Level Progression](#) guidance includes requirements and recommendations for providing partial credit.
- OSPI's ["Pink Book" of Homeschool Guidance](#).

#### Webpages

- [The OSPI webpage for High School Transcripts](#).
- SBE's [Mastery Based Learning webpage](#).
  - [SBE's Mastery-based Crediting Handbook 2.0](#).

#### Other Resources

- [The Office for Civil Rights](#) can provide guidance on report cards and transcripts for students with disabilities attending public elementary and secondary schools.

### 4B. How should a CTE statewide equivalency credit look on a transcript?

If a CTE course is utilized for full or partial credit towards an academic core course, it must be recorded on the transcript with both the CTE CIP code and the academic core course's Course ID, Course Title, Content Area Code, State Course Code, and any Course Designation Code(s).

Understanding how your Student Information System works and the options you have in operating course properties will significantly help in creating an accurate transcription process that works for your district and your students.

Additional information can be found in the [2022 Transcript Developer User Guide Special Edition \(www.ospi.k12.wa.us\)](#).

### 4C. How is a CTE statewide course equivalency credit applied to a student's graduation credit requirements?

School counselors and students will work together to determine whether the credit earned from a CTE equivalency course should be applied to the CTE graduation requirement or to the core academic area for which the equivalency exists.

**Legislative update:** [Senate Bill \(SB\) 5617 \(2023\)](#) (Facilitating course equivalency agreements between skill centers and school districts) requires that approved local or state equivalency courses at any core, branch, or satellite skill center must be offered for academic credit to all students from all districts participating in courses at those sites.

**IMPORTANT NOTE:** A record of CTE equivalency course completion certificates is a required part of a student's HSBP ([RCW 28A.230.097](#)). See question 1C in "Develop an HSBP" for more information.

**Figure 5: CTE equivalency course offered at a skill center example scenario.**

<b>Fire Sciences is a 540-hour state equivalency for Lab Science and Physical Education.</b>
<ul style="list-style-type: none"><li>• RCW 28A.230.097 states that equivalent credit <b>must be offered for academic credit</b> (Lab Science and PE credit)<ul style="list-style-type: none"><li>○ Course is transcribed as 1.0 Lab Science credit (0.5 credit per semester)</li><li>○ Course is transcribed as 1.0 PE credit (0.5 credit per semester)</li><li>○ Course is transcribed as 1.0 CTE course (0.5 credit per semester)</li></ul></li><li>• Student elects to take a course for academic credit and CTE credit<ul style="list-style-type: none"><li>○ Course is transcribed as academic credit (as above) or overridden with CTE course title and credit determination</li></ul></li><li>• Student elects to take the course as an elective course<ul style="list-style-type: none"><li>○ Course is transcribed as academic credit (as above) and overridden with CTE course title and credit determination</li></ul></li></ul>
<p><b>Please note:</b> Transcription is locally determined.</p>

**Source:** Skills Center Equivalency Credit, January 2023.

## 4D. If a course is modified to meet a student's specific needs, does it appear differently on a transcript?

Modified courses may **not** have a title, asterisk, or any other designation identifying the course as "modified." Unless there are separate course codes and titles that differentiate the two courses, there is no way to designate a modified course on a transcript. According to the [High School Transcript FAQ](#), certain allowable Course Designation Codes can be added to a transcript, and a modified course is not one of them:

**Figure 6: Allowable Course Designations**

**What are the Course Designation Codes that can be used on the transcript?**  
**Answer:** Below are allowable Course Designation key values. Please note that O = Online is not a valid value on the high school transcript but is reported to The Comprehensive Education Data and Research System (CEDARS).

A = Advanced	I = Intl Baccalaureate	Q = Quantitative	Z = Non-instructional
B = CADR	K = Cambridge Intl	R = Running Start	
C = College in the HS	L = Local Comp Test	S = Science Lab	
H = Honors Option	N = National Comp Test	T = CTE Dual Credit (formerly Tech Prep)	

**Source:** High School Transcript FAQ, July 2020.

If the course meets the requirements of the Course Designation Code, then the appropriate code must be used regardless of if the courses were modified. Courses listed on a transcript must identify the course the student was enrolled in. It may not identify any differentiation in courses (such as content-based core instructional courses for ML/English learners) or modifications or accommodations within the course for a specific student(s) (such as comparable content course substitutions). For example, if an Advanced Placement or Honors course has a modified curriculum, it can **still** receive one of the codes above. Additionally, the above codes are the **only** codes that may be used.



## 5. LANGUAGE ACCESS SERVICES

### 5A. Who should be provided language access services?

Steps to meet language needs should be taken to ensure effective communication with individuals with:

- Limited English proficiency
- Emerging ability to read, write, speak, or understand English
- Communication disabilities (e.g., deaf, hard of hearing, blind, deaf-blind)

Districts should utilize the tools and guidance provided by their language access coordinators or the information provided on OSPI's [Interpretation and Translation](#) page ([Bulletin: New Requirements Related to Language Access Legislation \(www.ospi.k12.wa.us\)](#)).

Examples of communication aids and services include but are not limited to:

- American Sign Language interpreters
- Video remote interpreting
- Large print materials
- Captioning
- Digital materials
- Easy access to language access associated materials

Web-based applications or software (e.g., Google Translate) **do not qualify** as services. These programs do not guarantee quality or accuracy.

### 5B. Who is responsible for identifying and budgeting for language access services?

- The district, not the individual in need of services, should take responsibility for initiating free language access services and taking the appropriate steps to provide access to services in a timely manner and without avoidable delay. (Lau v. Nichols, 414 U.S. 563 (1974), [RCW 49.60.215](#), [Title VI regulations](#), [Chapter 28A.642 RCW](#), [Chapter 392-190 WAC](#))
- It is best practice for a district to track language services provided each fiscal year for progress and improvements and determine any budget requirements necessary to support the delivery of these services.

## 6. EXTENDED SUPPORTS FOR STUDENTS NEEDING MORE TIME TO GRADUATE

### 6A. What guidance and resources are available on the topic of extended graduation supports for students?

#### Guidance/Bulletins

- Student Engagement and Support [OSPI Bulletin No. 004-20](#)
- [OSPI's On-Time Grade-Level Progression](#) guidance that includes requirements and recommendations for providing partial credit
- SBE [High School Credits FAQ](#)

#### Webpages

- OSPI webpage for [Open Doors Youth Reengagement](#)
- OSPI webpage for [Learning Alternatives](#)
- [Washington State Skill Center Association](#)

#### Other Resources

- [Running Start FAQ](#)

### 6B. Can a student who has earned a GED continue to work toward a high school diploma and get special educational support and/or participate in a skill center?

A GED is not considered a regular high school diploma. Students under 22 who have earned a GED are still considered to be eligible to fulfill their high school graduation requirement and earn a regular high school diploma. Also, students enrolled in a Youth Reengagement program may obtain a GED and stay enrolled until they have earned a diploma or reached 22.

If a student has withdrawn to take the GED, they would need to reenroll in their local school and begin to work towards meeting the graduation requirements for their graduation cohort year to earn a high school diploma. Per [WAC 392-172A-02000](#), a student who has a GED would also be able to continue receiving special education services from the public school district if determined to be eligible—at least until they either receive a high school diploma or reach the age of 22 (see Section C of WAC 392-172A-02000 and the note on page 24).

Skill center participation would be an option if it meets the student's graduation plan and the student can meet the admission requirements. If students with an IEP or 504 Plan require modifications or accommodations, the skill center is responsible for providing these services in collaboration with the student's home school district. A student's IEP team may also determine that certain transition services are needed as part of a student IEP Transition Plan, and this could include participation in a skill center.

For a student who has a disability and is over the age of 22, [high school transition](#) and employment support services can be provided by the [Division of Vocational Rehabilitation | DSHS - Washington](#).

## 6C. May a second-year senior enroll in the Running Start Program?

Yes, adult students who are continuing to get instructional support and special education services up to the age of 22 may enroll and have continued eligibility in the Running Start Program **if they have been previously enrolled** as a junior or a senior, but may only take those specific courses needed to meet the school district, charter school or tribal compact school graduation requirements. Additionally, a student enrolled in Running Start for more than one senior school year is limited to 45 total college credits for their senior years per [WAC 392-169-055](#). An adult student is understood as being a student who has not met high school graduation requirements by the end of the student's 12th grade academic year.

- [Running Start FAQ](#)
  - Please see No. 47. May a second-year senior enroll in the Running Start program?

## 6D. Are schools required to hold back a graduation requirement for a student with an IEP to continue to work on graduation requirements and get IEP services and support as an adult student through the age of 22?

No, schools do not need to hold back a credit or another graduation requirement, as federal and state regulations do not require a school district to graduate a student with a disability who has met a district's graduation requirements. The IEP team determines the student's graduation plan and date based on what is in the student's best interest for continuing their secondary education.

### Important Note

**On Thursday, May 23, 2024, the 9th Circuit Court of Appeals issued a ruling relating to a preliminary injunction in N. D. v. Reykdal. The 9th Circuit concluded that the availability of adult education programs triggers an obligation under the IDEA to provide special education services to 21-year-old students eligible for special education through their 22nd birthday. This ruling means that Washington state law is now in conflict with the IDEA, students eligible for special education are entitled to a free appropriate public education (FAPE) from ages "3–21, inclusive", meaning through their 22nd birthday. OSPI will work with the Legislature to reconcile our current state law, which, per the 9th Circuit's ruling, now conflicts with the IDEA. OSPI will be working to update guidance documents that reference the age of eligibility. See [Questions and Answers: Providing Special Education Services Until Age 22](#) for the most up-to-date information, this Q&A will be updated as more information becomes available.**

Students who have not yet met their high school graduation requirements nor earned a high school diploma after four years are eligible for free public education until the student's 22nd birthday. This includes students under 22 who have earned a high school equivalency certificate.

WAC 392-172A-02000 (2)(b) says: "(2) A student who is determined eligible for special education services shall remain eligible until [...] (b) The student has met high school graduation requirements established by the school district pursuant to rules of the SBE, **and** the student has graduated from high school with a regular high school diploma" (emphasis added). The rule distinguishes between meeting graduation requirements and graduating with a diploma precisely because it is up to an IEP team to determine a student's graduation plan, including transition services and the graduation date.

Additionally, Kevin's Law ([RCW 28A.155.170](#)) allows students who will continue to receive special education services under an IEP between the ages of 18 and 22 to participate in the graduation ceremony and activities after four years of high school attendance with their age-appropriate peers and receive a certificate of attendance. Students who participate in the graduation ceremony will receive a certificate of attendance, which is not a high school diploma. Students will receive a diploma when they complete their graduation requirements.

For more information to support IEP teams to make individualize decisions about a student's graduation data, plan and transition supports please review the [Tip from Special Education Division: Secondary Transition Services and Supports](#).

## **6E. Can a student who arrives in the United States between the ages of 18–22 still enroll in a Washington high school?**

Newly arrived students who are 14–18 years old should be placed in the grade that provides continuity with their prior schooling or at the age-appropriate grade if this will be their first high school experience. Students who are ages 19–21 at their time of arrival and have not completed their high school diploma are usually placed in a traditional high school but may also request to participate in an Open Doors or other alternative program to accommodate any outside responsibilities they may have while continuing their education until graduation or age 22 ([RCW 28A.150.220](#)).

Suppose a student has earned a high school diploma from another country but requests registration in a Washington high school. In that case, the district will need to determine if the student's certificate/diploma does or does not meet the state and local graduation requirements. If local requirements have not been met, and the student has not yet turned 22, they can be enrolled.

# ACKNOWLEDGMENTS

This FAQ was prepared in partnership with the SBE and staff from multiple divisions within OSPI. The time and expertise our partners contributed to the development of this resource is greatly appreciated.

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# REVISION LOG

Any **substantive** changes are noted below.

Page(s) Revised	Section	Description	Date
13	2E	First point under "developing a CTE Course Sequence" has been updated	9/1/2024
19–21	3H–3L	Physical Education questions nested under question 3.  3L updated to reflect transcript information.	9/1/2024
22	4B	Updated for clarity.	9/1/2024
26–27	6A and 6B	Updated the age from 21 to 22 and added resources regarding the court decision.	9/1/2024
All	Entire document	Updated entire document format.	9/1/2024

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