



ARIZONA DEPARTMENT OF EDUCATION

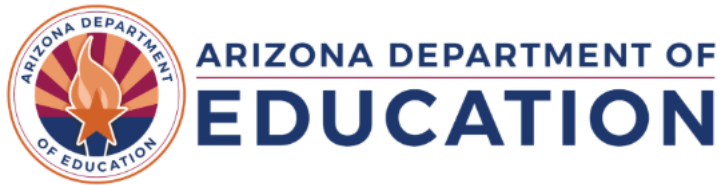
MEMORANDUM

To: Public Education Agencies (PEAs)
From: ADE Exceptional Student Services, Academic Standards, Accountability, and School Finance Sections
Date: December 1, 2025
Subject: Guidance for Planning Graduation Pathways for Students with Disabilities

The purpose of this memo is to provide agency-wide guidance to assist public education agencies (PEAs) in planning compliant and effective graduation pathways for students with disabilities. The Arizona Department of Education (ADE), Exceptional Student Services (ESS), Academic Standards, Accountability, and School Finance sections collaborated in the development of this document.

Special Education

For more than a decade, ADE/ESS has provided guidance and training regarding graduation for students with disabilities. The most frequently used resource is the *Frequently Asked Questions (FAQ) About Graduation of Students with Disabilities in Arizona's Schools*, available on the [ADE/ESS Arizona Technical Assistance System \(AzTAS\) webpage](#). This document explains what constitutes a Free Appropriate Public Education (FAPE) for transition-aged students, outlines Arizona's graduation requirements for all students, and identifies the conditions that end a student's right to FAPE. It combines federal law (the Individuals with Disabilities Education Act, or IDEA), Arizona statutes, and the Arizona Administrative Code (A.A.C.), which is set by the Arizona State Board of Education. ADE/ESS also offers guidance and training on effective postsecondary transition planning, as required by the IDEA and A.A.C. All graduation and transition planning resources align with Arizona Academic Standards and course selection criteria.



Academic Standards and Courses of Study

Graduation of students with disabilities in Arizona requires a coordinated approach that integrates both special education guidance and academic standards. While ADE/ESS ensures compliance with federal and state laws governing FAPE, transition planning, and graduation requirements, ADE Academic Standards provides the framework for course selection and credit alignment. These two areas work hand in hand: individualized planning under IDEA must align with Arizona's academic standards to ensure students earn credits toward graduation while meeting their unique needs. ADE Academic Standards encourages school counselors to collaborate with a student's Individualized Education Program (IEP) team to select courses that meet those needs. This may involve a nontraditional course path and could extend the time required to meet graduation requirements beyond four years.

A-F Letter Grade Accountability

A-F Letter Grade Accountability adds another layer of interconnectedness when planning for the graduation of students with disabilities: PEAs must balance providing appropriate services under federal and state statutes and board rules with accurate reporting of graduation data. ADE Accountability guidance states the following: *It is the intent of both the Arizona Department of Education (ADE) and the Arizona State Board of Education (SBE) not to penalize schools in A-F accountability for providing individual education programs (IEPs) that students deserve and are entitled to under Federal and State Law [34 C.F.R. § 300.102(a)(3)(i), 34 C.F.R. § 300.101, A.R.S. § 15-764(A)(1)].* Although these statutes affirm that students eligible for special education services can attend public school and receive services until age 22, a student's right to a FAPE ends upon receipt of a regular high school diploma. This distinction is critical when planning graduation and reporting outcomes, as it impacts both service provision and accountability measures.



Funding Considerations

Funding implications are equally critical when planning graduation for students with disabilities. ADE School Finance follows Arizona Revised Statutes (A.R.S.) § 15-901, which outlines that high school students may only be funded for subjects that count toward graduation as defined by the Arizona State Board of Education. Students who have met the graduation requirements (i.e., enrolled in subjects that count toward graduation) will not meet the definition of fractional or full-time students and generate zero Average Daily Membership (ADM). Similarly, under 34 CFR § 300.102(a)(3), “[t]he obligation to make FAPE [Free Appropriate Public Education] available to all children with disabilities does not apply with respect to the following: [c]hildren with disabilities who have graduated from high school with a regular high school diploma.” In summary, once a student with a disability has completed the graduation requirements, the obligation to provide FAPE ends. Therefore, PEAs cannot claim ADM or access federal funds to provide services for students with disabilities who have completed graduation requirements.

Resources in Development

The ADE recognizes the challenges in designing programs that provide students with disabilities access to FAPE and courses aligned with state graduation requirements. ADE/ESS and Academic Standards are developing additional resources and training with input from the field to help PEAs create clear, personalized graduation pathways that reflect each student’s goals and post-secondary aspirations.

Key features of the upcoming guidance may include:

- Tools for annual review of courses and adjustment of graduation-related goals
- Support for course selection that promotes both academic achievement and skill development aligned with measurable postsecondary goals



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- Strategies to keep students on track for graduation with the knowledge and competencies needed for success beyond high school, while allowing flexibility each year as needs change

ADE remains committed to empowering parents, educators, and school counselors with the resources necessary to make informed decisions that positively impact student outcomes. More information and materials will be shared as they become available.

For additional information about special education, please [contact the ESS Inbox](#).

For additional information about Academic Standards and courses of study, please [contact the K12 Standards Inbox](#).

For additional information about Accountability, please [contact the Academic Achievement Inbox](#).

For additional information about special education funding, please [contact the School Finance Inbox](#).