



Exceptional Student Services

Arizona Department of Education

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Exceptional Student Services

Arizona Technical Assistance System (AZ-TAS)

Frequently Asked Questions about Graduation of Students with Disabilities in Arizona's Schools

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Updated to reflect the [Arizona State Board of Education rule change](#) to Individualized Education Program (IEP) requirements, specifically secondary transition services, adopted in October 2024; information contained in the [Graduation Joint Guidance Memo \(ADE 12/1/25\)](#); requests for clarification from constituents; and technical changes.



ARIZONA DEPARTMENT OF
EDUCATION

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Introduction

Graduation occupies an important place within the educational experience. Since landmark civil rights advancements affirmed the principle that all students are entitled to equitable participation in educational institutions, completing high school has come to represent an important transition in the K-12 system. Over time, federal legislation, including the Individuals with Disabilities Education Act (IDEA), No Child Left Behind (NCLB), and the Every Student Succeeds Act (ESSA), has reinforced the commitment to ensuring that students with disabilities are able to pursue the same pathways to high school graduation available to all students.

This document, created by the Arizona Department of Education's Exceptional Student Services (ADE/ESS) section, in collaboration with the ADE Academic Standards, Accountability, Assessment, and Finance sections, is intended to provide technical assistance to special education stakeholders. Written in question-and-answer format, it addresses inquiries submitted to ADE/ESS regarding the graduation of students with disabilities. The questions are organized into three categories: Federal and State Graduation Requirements, IEP Considerations, and Additional Guidance and Implications.

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Federal and State Graduation Requirements

How does the Individuals with Disabilities Education Act describe a free and appropriate public education (FAPE)?

The Individuals with Disabilities Education Act (IDEA) is a comprehensive federal law that governs the provision of special education and related services to children with disabilities. One of the stated purposes of the IDEA is to “ensure that all children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living.”¹ A FAPE is defined as special education and related services that are provided at public expense, under public supervision and direction, and at no cost to parents.² These must be provided in conformity with each student's individualized education program (IEP).³

How does high school graduation affect the right of a child with a disability to receive a FAPE?

The federal regulations that implement the IDEA, in conjunction with applicable Arizona Revised Statutes, require that all children with disabilities are entitled to a FAPE until they have either completed the requirements for a regular high school diploma or reach age 22.^{4, 5} This aligns with Arizona law, which permits all students to attend high school up to age 21 if they have not yet earned a high school diploma.⁶ Notably, in Arizona, students with disabilities **who have not earned a regular high school diploma** and who turn 22 during the regular school year shall continue to receive special education services through the end of that school year.⁷

Are students with disabilities entitled to receive FAPE until age 22, regardless of their graduation status?

In Arizona, all students, regardless of disability, are entitled to attend public school and participate in instruction leading to a high school diploma until age 21, and schools receive state funding based on students who are enrolled in and attending classes that meet high school diploma requirements.^{8, 9} However, this general entitlement does not guarantee that students with disabilities will continue receiving FAPE until age 22. According to the regulations that implement the IDEA, a student's right to FAPE ends when the student has earned a regular high school diploma, even if the student with a disability is younger than 22 years old. Once a student with a disability earns a diploma—defined as meeting all state and local graduation requirements aligned with Arizona's academic standards—eligibility for special education services ends.¹⁰ Thus, students with disabilities are **not** automatically entitled to receive FAPE until age 22.

What is a regular high school diploma in Arizona?

A regular high school diploma is a documented acknowledgment by a public education agency's (PEA) governing board that a student has met the graduation requirements established by the Arizona State Board of Education by successfully earning a passing grade in courses aligned with the State's academic standards. This determination is made at the PEA level. Specifically, "the determination and verification of student accomplishment and performance shall be the responsibility of the subject area teacher."¹¹

In Arizona, the diploma that qualifies as a *regular high school diploma* is the standard high school diploma that is issued to a preponderance of students in the State, a higher diploma awarded by a governing board, or the Grand Canyon diploma.¹²

Does a GED or a certificate issued by the PEA qualify as a regular high school diploma?

No. A GED or other certificate issued by the PEA is not recognized as a regular high school diploma. According to the regulations that implement the IDEA, a regular high school diploma is a diploma that is aligned with the state's academic standards. To conform with the definition found in the Elementary and Secondary Education Act (ESEA), the IDEA regulations clarify that the term *regular high school diploma* means "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 1111(b)(1)(E) of the ESEA. A regular high school diploma does not include a recognized equivalent of a diploma, such as a general equivalency diploma, certificate of completion, certificate of attendance, or similar lesser credential."¹³ Although it is within the authority of PEAs to issue an alternative credential not aligned with the State's academic standards or any other alternative certificate option, these options are not considered a regular high school diploma. A student who has not completed all graduation requirements necessary to earn a regular high school diploma still has the right to receive a FAPE.¹⁴

All students should be given the opportunity to earn a regular high school diploma. However, there are instances in which a student may not receive a regular diploma. For a small subset of students, even when provided with substantial support, accommodation, curriculum modification, and services beyond their graduation cohort, the ability to meet minimum state standard requirements may not be possible.

How are a PEA's minimum requirements for high school graduation determined?

The Arizona State Board of Education has established 22 required credits as the minimum number of credits in specified subject areas necessary for high school graduation. Specifically, students must

earn credits in the content areas listed below as determined by the PEA:

- English or English as a Second Language: 4 credits
- Social Studies: 3 credits
- Mathematics: 4 credits
- Science: 3 credits
- The Arts or Career and Technical Education: 1 credit
- Locally Prescribed Courses: 7 credits

Additional information regarding course content and how these requirements may be met for all students, regardless of disability, is defined in greater detail in the Arizona State Board of Education rules.¹⁵ The mathematics requirements may be modified for students using a personal curriculum pursuant to [R7-2-302.03](#).

While the Arizona State Board of Education is charged with prescribing a minimum course of study and corresponding competency requirements, incorporating the academic standards in at least the areas of reading, writing, mathematics, science, and social studies,¹⁶ a charter school or district's governing board has the flexibility to prescribe a course of study and competency requirements that are consistent with and not less than the course of study and competency requirements that the Arizona State Board of Education prescribes.¹⁷

What is the difference between high school graduation and “aging out” of high school?

In Arizona, students with disabilities who reach the age of 22 during the regular school year shall continue to receive special education services until the end of that school year, if they have not earned a regular high school diploma.^{18, 19} When a student with a disability completes the school year in which he or she turns 22, the student “ages out” of special education and is no longer eligible to receive a FAPE, whether or not the student has met the requirements for a regular high school diploma. This differs from graduating, which means that the student has met the requirements for a regular high school diploma by successfully completing coursework aligned with the state's academic standards, or higher standards established by the PEA, and has therefore earned a regular high school diploma.

Does ADE determine Arizona’s graduation requirements?

No. ADE **does not** determine Arizona’s graduation requirements. The Arizona State Legislature directed the Arizona State Board of Education to prescribe a minimum course of study for the graduation of pupils from high school.²⁰ Accordingly, the Arizona State Board of Education has established the minimum course of study and competency requirements for graduation from high school through the rulemaking process. These requirements are in Arizona Administrative Code Title 7, Chapter 2.²¹

Does ADE require that students with disabilities graduate high school within four years, alongside their cohort?

No. ADE **does not** require that students with disabilities graduate with their cohort. Graduation is determined by the local governing board, based on the credits earned that align with the Arizona State Board of Education's rules. Some students, with or without disabilities, may not earn course credits within a traditional timeframe and may need more time to meet graduation requirements. Meeting graduation requirements means that the student has successfully completed coursework aligned with the State’s academic standards, or higher standards established by the district or charter, and has earned a regular high school diploma.²²

How does graduation for a student with a disability occurring outside his/her cohort (i.e., graduates as a 5+ year senior) impact items like a PEA’s annual IDEA Determination or A-F Letter Grade?

PEA IDEA Determination: States are required by the federal regulations that implement the IDEA to annually evaluate each PEA’s performance on identified special education criteria, including graduation.²³ For federal reporting purposes, graduation for students with disabilities is captured and recorded in the year a student earns his/her regular high school diploma. A student is not required to be reported as graduated in his/her original cohort to be counted as a graduate. Thus, the IDEA Determination for a particular PEA is not affected by a student who graduates in years 5, 6, or 7.

A-F Letter Grade: Arizona’s A-F Letter Grade Accountability System is required by statute and has been designed by the Arizona State Board of Education.²⁴ The A-F School Accountability System was revised in June 2024 to better reflect the realities of students with disabilities, particularly those who

graduate in extended cohorts rather than the traditional four-year timeline. The revised accountability model includes multiple graduation cohorts, each with a different weight. This approach acknowledges that students with disabilities may require more time to graduate. Positive but proportionally smaller weights are assigned to extended cohorts in this model, ensuring that schools are not penalized for supporting students who need additional time.

Is a PEA required to educate special education students after they graduate with a regular high school diploma?

Under federal and Arizona state law, students with disabilities are entitled to a FAPE **until** they graduate with a regular high school diploma. Once a student earns this diploma—meaning they’ve met all the academic requirements set by the Arizona State Board of Education and their local school district—they are no longer eligible to receive special education services under FAPE.²⁵ Thus, public schools are not required to continue providing services or enroll students who have already graduated with a recognized diploma.²⁶

Can a PEA provide special education services after a student graduates with a regular high school diploma?

A PEA can choose to continue providing services to students who have already met the requirements for a regular high school diploma. However, the school would not receive state or federal funding for these students. For more details on funding, please review the question below.²⁷

Can a school continue to receive funding for a student with a disability after he or she graduates with a regular high school diploma?

No. Once a student with a disability has met all graduation requirements and received a regular high school diploma, no further classes “count toward graduation,” and he or she is no longer a full- or part-time student, per the terms defined in A.R.S. § 15-901(A)(1). If a student has completed the requirements for graduation, they are no longer considered eligible to generate Average Daily Membership (ADM) for state funding purposes. Additionally, under federal law (34 CFR § 300.102(a)(3)), the obligation to provide a FAPE ends upon graduation with a regular high school diploma. Therefore, PEAs cannot claim state ADM or use federal IDEA funds to provide services for students who have completed graduation requirements.²⁸

IEP Considerations

What is the IEP team’s role regarding graduation requirements?

An IEP team may **determine the sequence of courses and which classes the student may take** to fulfill the minimum competency requirements, provided the classes are aligned with Arizona’s state standards. Regardless of the student’s educational environment, IEP teams determine the accommodations, modifications, and other supports needed in a course so that the student can access the content and make meaningful academic progress.²⁹ Courses taken across different settings and in various placement environments may be eligible for credit toward a regular high school diploma if the course is aligned to the state standards in the requisite content category. The determination as to whether course content is appropriately aligned to Arizona’s Academic Standards is made at the PEA level and should be decided on a case-by-case basis. Mastery of IEP academic and/or completion of transition activities designed to support advancement toward measurable postsecondary goals should enable students with disabilities to access and progress in the minimum course of study set forth by the Arizona State Board of Education and PEA, but it cannot be substituted for earning the credits required for graduation. *IEP teams may not alter the number of credits or subject areas necessary to earn a regular high school diploma.*

To clarify the relationship between federal law and state authority regarding graduation, it is important to note the following foundational principles: the IDEA does not make achievement of the IEP goals of a student with a disability a prerequisite for acquiring a regular high school diploma. Further, it does not establish standards for graduation as a general matter, except to tie diploma requirements to state academic standards.^{30, 31, 32} The Every Student Succeeds Act (ESSA) requires States to apply the same content and achievement standards to all students,³³ including students with disabilities.³⁴ The ESSA states that, “the authority to set and/or modify those standards rests solely with the State” (which, in Arizona, is the State Board of Education) and “[g]iving IEP teams authority to apply different standards for promotion or graduation to students with disabilities will result in those students being taught to different and, [sic] potentially lower, standards than students without disabilities, thus depriving them of the same opportunities to learn that are available to their non-

disabled peers.”³⁵ Failing to apply the same academic standards to students with disabilities would be inconsistent with the IDEA’s definition of special education, which requires schools to specially design instruction to meet the unique needs of children with disabilities and provide access to the general curriculum so that they can meet the educational standards that apply to all children.³⁶

How are postsecondary transition activities in IEPs different from graduation requirements?

Graduation requirements are defined, for all students, as the minimum course of study and corresponding competency requirements established by the Arizona State Board of Education that students must meet to receive a regular high school diploma.

Postsecondary transition activities, in contrast to graduation requirements, are designed to prepare a student with a disability to pursue employment, education/training, and independent living goals after high school, in accordance with the purpose of the IDEA.

In Arizona, transition services are to be in place when a student ends 9th grade or turns 16 years old, whichever is first, or earlier, as determined necessary by the student’s IEP team.³⁷ The transition services may identify specific instruction and/or activities directly related to measurable postsecondary goals (MPGs) that could take place in a required course. It is important to note that the course of study outlined in a student’s IEP is part of the transition activities, not the student’s plan to earn a regular high school diploma. The courses listed in the IEP are targeted at allowing the student to gain knowledge and skills directly related to the MPGs. They are not designed to be an exhaustive list of graduation requirements.³⁸ Transition activities are integrated into and co-occur with a student’s coursework and are not delayed until after completion of coursework toward graduation requirements.

Secondary transition activities are required for a FAPE and are critical to the success of students with disabilities for their adult lives. ADE/ESS employs a team of knowledgeable professionals dedicated to supporting transition stakeholders in meeting the secondary transition needs of school-age youths with disabilities. For more information, please [visit the ADE/ESS Secondary Transition website](#).

Are there additional documentation requirements for PEAs related to the graduation of students with disabilities?

The PEA must provide the following notices to parents, or adult students who have reached the age of majority, related to the completion of high school:

- The student’s anticipated graduation date, at least one year before the anticipated high school graduation date.³⁹
- The student’s estimated graduation date, documented in their IEP and aligned with the transition plan.⁴⁰
- Upon exit from high school through the completion of graduation requirements or reaching the maximum age, the Summary of Academic Achievement and Functional Performance (SOP) (i.e., documentation which includes recommendations to assist an “exiting” student in meeting his or her postsecondary goals.⁴¹

Documentation requirements are in addition to and not instead of federal requirements at C.F.R. 300.503 to provide prior written notice, typically sent at a reasonable time before implementing a change in placement. PEAs are not required to evaluate a student with a disability whose end of eligibility for special education and related services results from the student aging out or graduating.⁴²

What does it mean to align the “estimated date of graduation” with the transition plan?

Once a transition plan is included in a student’s IEP, the team must also include an estimated date of graduation. To align the graduation date with the transition plan, the IEP team must ensure that the student has enough time to participate in and complete all needed transition services and activities **before** earning a regular high school diploma.⁴³ This means the student’s courses, credit-earning path, and transition activities should be planned together so that the student is exposed to opportunities that will allow him or her to make progress toward measurable postsecondary goals during the years the student is still enrolled in school and eligible for a FAPE. Because graduation with a regular high school diploma ends the student’s right to special education services, the IEP team must review the student’s coursework and transition needs every year and adjust the transition plan or estimated

graduation date as necessary.⁴⁴

Can a student with an IEP follow a non-traditional course path and still meet graduation requirements?

Yes. Individualized planning under the IDEA may involve a nontraditional course path, which could extend the time required to graduate beyond the traditional four-year timeline. This flexibility promotes both academic achievement and skill development aligned with measurable postsecondary goals, while ensuring that a FAPE is provided to meet the students' unique needs. The IEP team should collaborate with school counselors to ensure that the courses required for a regular high school diploma provide both academic rigor and skill development aligned with measurable postsecondary goals. For additional information, see the question: [Does ADE require that students with disabilities graduate high school within four years, alongside their cohort?](#)

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Additional Guidance and Implications

Can students participating in the Multi-State Alternate Assessment (MSAA) receive credit toward graduation for coursework?

Yes. Arizona administers the Multi-State Alternate Assessment (MSAA) for English and math. There is only one set of academic standards for English and Math. The MSAA is a comprehensive assessment system designed to assess students with significant cognitive disabilities and measure academic content aligned to and derived from Arizona's academic standards. Students whose coursework is aligned to the state's academic standards through core content connectors, who would therefore participate in alternate assessments, can receive credit toward earning a regular high school diploma upon successfully completing coursework. The determination as to whether course content is appropriately aligned to Arizona's Academic Standards is made at the PEA level.⁴⁵ The Core Content Connectors (CCCs) can be [found on the ADE MSAA website under the Resources tab](#), in the "Arizona Academic Standards-linking documents" for English and Language Arts and Mathematics.

Does a student with a disability need to pass the Civics test to graduate?

A student with a disability is not required to pass the civics test to graduate from high school unless he or she “is learning at a level appropriate for the pupil's grade level in a specific academic area” and unless a passing score on the statewide assessment or the [civics test] is specifically required in a specific academic area by the pupil's individualized education program as mutually agreed on by the pupil's parents and the pupil's individualized education program team or the pupil, if the pupil is at least eighteen years of age.⁴⁶

Schools must document on each student's transcript that he or she has passed the civics test.⁴⁷ To meet this documentation requirement for students with disabilities who are not required to pass the civics test without revealing the student's disability status in violation of the Family Educational Rights and Privacy Act ([FERPA](#)), schools can indicate on the student's transcript that the civics test requirement has been *met* or *not met*.

Does a student with a disability need to participate in or complete a school-offered cardiopulmonary resuscitation (CPR) program to graduate?

A.R.S. § 15-718.01(A) states, “On or before July 1, 2019, school districts and charter schools shall provide public school pupils with one or more training sessions in cardiopulmonary resuscitation, through the use of psychomotor skills in an age-appropriate manner, during high school.”⁴⁸ Although it is unclear from the statute whether CPR training is required for graduation, A.R.S. § 15-718.01(D)(3) allows a child's IEP team to make an individualized determination to excuse the child from the instruction.

Can a student participate in a graduation ceremony without earning a regular high school diploma?

The graduation ceremony refers to the event where students are awarded academic degrees or diplomas and is not synonymous with a student's eligibility to receive a diploma. Section 504 of the Rehabilitation Act prohibits PEAs from limiting participation in graduation ceremonies to only students who graduate with a regular high school diploma. Arizona has no specific law or policy regarding who can participate in graduation ceremonies. The decision about whether a particular student may participate lies with the individual PEA. It must be made in compliance with Section 504 of the

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Citations

- ¹ [20 United States Code \(20 U.S.C.\) § 1400\(d\)](#)
- ² [20 U.S.C. § 1401\(9\)](#)
- ³ *Id.*
- ⁴ [34 Code of Federal Regulations \(34 C.F.R.\) § 300.101](#)
- ⁵ [34 C.F.R. § 300.102\(a\)](#)
- ⁶ [Arizona Revised Statutes \(A.R.S.\) § 15-821](#)
- ⁷ [A.R.S. § 15-764\(A\)\(1\)](#)
- ⁸ *Id.*
- ⁹ [A.R.S. § 15-901\(A\)\(1\)](#)
- ¹⁰ [34 C.F.R. § 300.102\(a\)](#)
- ¹¹ [Arizona Administrative Code \(A.A.C.\) sections R7-2-302\(5\)\(b\)](#)
- ¹² [A.R.S. § 15-792.03](#)
- ¹³ [34 C.F.R. §300.102\(a\)\(3\)\(ii\)](#)
- ¹⁴ [34 C.F.R. § 300.102\(a\)\(3\)\(iv\)](#)
- ¹⁵ [A.A.C. R7-2-302](#)
- ¹⁶ [A.R.S. § 15-701.01](#)
- ¹⁷ [A.A.C. R7-2-301\(B\)](#)
- ¹⁸ [A.R.S. § 15-764\(A\)\(1\)](#)
- ¹⁹ [34 C.F.R. § 300.101](#)
- ²⁰ [A.R.S. § 15-701.01\(A\)\(1\)](#)
- ²¹ [A.A.C. R7-2-302](#)
- ²² *Id.*
- ²³ [34 C.F.R. § 300.600 \(a\)\(4\)](#)
- ²⁴ [A.R.S. § 15-241](#)
- ²⁵ [34 C.F.R. § 300.102\(a\)\(3\)](#)

26 [A.R.S. § 15-821](#)
27 [ARS 15-901\(A\)\(1\)](#)
28 [Guidance for Planning Graduation Pathways for Students with Disabilities Memorandum 12.01.25](#)
29 [A.A.C. R7-2-401\(G\)](#)
30 [See, e.g., Letter to Richards, 17 IDELR 288 \(OSERS 1990\)](#)
31 [34 C.F.R. § 300.102\(a\)\(3\)](#)
32 [34 C.F.R. § 300.320](#)
33 [20 U.S.C. § 6311\(b\)\(1\)\(B\)](#)
34 [Letter to White, 63 IDELR 230 \(OSERS 2014\)](#)
35 *Id.*
36 [34 C.F.R. § 300.39\(b\)\(3\)](#)
37 [A.A.C. R7-2-401\(G\)\(4\)\(a\)](#)
38 [34 C.F.R. § 300.43](#)
39 [A.A.C. R7-2-401\(G\)\(4\)\(a\)\(iii\)](#)
40 *Id.*
41 [34 C.F.R. § 300.305\(e\)\(3\)](#)
42 [34 C.F.R. § 300.305\(e\)\(2\)](#)
43 Alignment [A.A.C. R7-2-401\(G\)\(4\)\(a\)\(iii\)](#)
44 [A.A.C. R7-2-401\(G\)\(4\)\(a\)](#)
45 [A.A.C. R7-2-302](#)
46 [A.R.S. § 15-763\(A\)](#)
47 [A.R.S. § 15-701.01\(A\)\(3\)](#)
48 [A.R.S. § 15-718.01\(A\)](#)