The Special Education Advisory Council (SEAC) would like to acknowledge the actions of the legislature for establishing multiple pathways to graduation and appreciate the State Board of Education’s drafted rules supporting the new requirements. The SEAC would urge the State Board of Education make every pathway available to all students, including those with disabilities. Historically, the Certificate of Individual Achievement (CIA) was created as an alternative for a very small percentage of students, less than 1 percent of students. However, over time, Individualized Education Plan (IEP) teams have over-utilized the CIA methodology to lower the state graduation standards for students with disabilities and created a system where in 2019, 49.3 percent of students with disabilities graduated with a CIA in reading and 62.1 percent of students with disabilities graduated with a CIA in math. Overall, resulting in a lower bar of expected academic achievement, with serious implications for post-secondary outcomes of students with disabilities.

In keeping with the SEAC’s beliefs of growth mindset, authentic measurement of student learning, and individualized student programs, we would like to recommend that the State Board of Education:

- Clearly define the “limited circumstances” and “unique needs” that would allow for a substitution for one of the pathways referenced in WAC 180-51-115. We fear that this vague terminology will lead to overuse as we saw with the CIA. Less than 1 percent of students should qualify.
- Make definitions for each of the pathway requirements clear and focus on student strength.
- Remove the option for IEP teams to exempt students with disabilities from graduation requirements.
- Acknowledge that students with disabilities can and should be accessing and progressing in the K-12 Learning standards, with supplemental special education services and accommodations, as determined by the IEP team.

References
SEAC Recommendation for De-Linking the State Assessment and Graduation Requirements

Graduation Results for Students with Disabilities in Washington State prepared by Glenna Gallo, Assistant Superintendent, Special Education, September 17, 2019

Student Information, CAA/CIA Database, Office of Superintendent of Public Instruction, September 9, 2019

Multiple Pathways to Graduation — https://www.k12.wa.us/student-success/graduation/graduation-requirements/multiple-paths-graduation-house-bill-1599