

Date of Hearing: March 25, 2026

ASSEMBLY COMMITTEE ON EDUCATION  
Darshana R. Patel, Chair  
AB 2191 (Quirk-Silva) – As Introduced February 19, 2026

**SUBJECT:** High school graduation requirements: alternate pathways for individuals with exceptional needs: statewide resources

**SUMMARY:** Establishes, subject to an appropriation, a statewide special education resource project focused on establishing alternate pathways to a diploma for students with disabilities. Specifically, **this bill:**

- 1) Requires the California Collaborative for Educational Excellence (CCEE) and the California Department of Education (CDE), subject to an appropriation for this purpose, on or before an unspecified date, to establish a statewide resource focused on establishing alternate pathways to a diploma for students with disabilities through capacity building within the state's System of Support (SOS), training, and technical assistance.

**EXISTING LAW:**

Alternate Pathway to a Diploma:

- 1) Requires LEAs to exempt students with disabilities who entered ninth grade in the 2022–23 school year or later from all courses and other requirements adopted by the governing board or body of the LEA that are additional to the statewide course requirements and award the pupil a diploma of graduation from high school, if:
  - a) The student's individualized education program (IEP) team has deemed them eligible to take the state alternate assessments; and
  - b) The student is required to complete state standards aligned coursework to meet the statewide course requirements for graduation from high school. (Education Code (EC) 51225.31)
- 2) States that an award of a diploma of graduation from high school does not change an LEA's obligation to provide a free appropriate public education (FAPE) or otherwise constitute a change in placement. (EC 51225.31)
- 3) States that student with a disability who meets these criteria for the diploma shall be eligible to participate in any graduation ceremony and any school activity related to graduation with their grade-level peers with and without disabilities, and that participation in graduation activities shall not be construed as termination of the provision of a FAPE unless the IEP team has determined the pupil has completed their high school experience. (EC 51225.31)

Special education resource leads:

- 4) Requires the CCEE and the CDE to establish a process, administered by the CDE, to select, subject to approval by the executive director of the State Board of Education (SBE), in consultation with the Department of Finance (DOF), special education local plan areas

(SELPAs), county offices of education (COEs), or consortia of SELPAs and COEs to serve as special education resource leads to work with lead agencies and other COEs to improve student outcomes as part of the SOS. (EC 52073.2)

- 5) Requires the process to select special education resource leads ensure that no more than 10 special education resource leads are selected to provide specific expertise on special education issues within the SOS. (EC 52073.2)
- 6) Requires that at least three resource leads be selected in a manner to ensure statewide representation and focus directly on building local and regional capacity to support LEAs in achieving the goals, actions, and services identified in their local control and accountability plans (LCAPs). (EC 52073.2)
- 7) Requires that resource leads be selected for a term not to exceed five years. (EC 52073.2)
- 8) Requires that, commencing with the grant cycle beginning July 1, 2023:
  - a) At least one resource lead be selected to support the development and implementation of high-quality IEPs; and
  - b) At least one resource lead be selected to, in partnership with a family support organization, provide capacity building, training, and technical assistance on family support for families of pupils with disabilities, and conflict prevention and alternate dispute resolution (ADR) in special education. (EC 52073.2)

#### Certificates of completion

- 9) Authorizes LEAs to award an individual with exceptional needs a certificate of educational achievement or completion if:
  - a) They have satisfactorily completed a prescribed alternative course of study approved by the governing board of their school district and identified in their IEP;
  - b) They have satisfactorily met their IEP goals and objectives during high school as determined by the IEP program team; or
  - c) They have satisfactorily attended high school, participated in the instruction as prescribed in their IEP, and have met the objectives of their transition plan. (EC 56390)

**FISCAL EFFECT:** Unknown

#### **COMMENTS:**

***Need for the bill.*** The author states, “A high school diploma opens a world of opportunities for California youth. Every young person deserves a pathway to earn a high school diploma regardless of their conditions. For far too long students with disabilities have been denied high school diplomas and relegated to certificates of completion. These certificates are not widely recognized by institutions of higher education and employers, further limiting the chance that these students will have at independence and academic growth. AB 2191 establishes upon

appropriation, a statewide resource focused on eliminating the unnecessary barriers that stand between our neurodivergent students and the access, equity, and opportunity they deserve in earning a high school diploma. Making sure that a special education resource lead project is providing technical assistance, peer support, and resources to help school districts implement the important policy of alternative pathways.”

**Alternate Pathways to a Diploma workgroup.** SB 74 (Committee on Budget and Fiscal Review), Chapter 6, Statutes of 2020, the Budget Act of 2020, appropriated \$250,000 for the purpose of convening a workgroup to examine and propose alternative pathways to a high school diploma for students with disabilities.

The Alternate Pathways to a High School Diploma Workgroup recommended that in addition to maximizing California’s existing diploma pathways, the state should create a new pathway, specifically for students with significant cognitive disabilities. This new pathway would allow high school diploma attainment through meeting state minimum course requirements, in a manner that also meets federal graduation criteria for state accountability.

**California’s Alternate Pathway to a Diploma policy.** California’s Alternate Pathway to a Diploma is for students with significant cognitive disabilities who take the California Alternate Assessment. A student’s IEP team decides whether they are eligible for the alternate pathway.

Students on this pathway fulfill standards-aligned courses aligned to the minimum course requirements for graduation, and are exempted from any local graduation requirements. After receiving a diploma through this pathway a student is still eligible to participate in public school until they are 22 or until the IEP team determines they have completed their high school experience, and does not end a student’s eligibility for services under the IDEA.

**Benefits of earning a diploma through the Alternate Pathway.** There are many benefits of earning a diploma for students with significant cognitive disabilities, including:

- Access to standards-aligned instruction;
- Improved post-secondary opportunities, including employment and education;
- Continued education until age 22 pursuant to their IEP; and
- Inclusion in graduation ceremonies with peers.

**High school outcomes for students with disabilities.** The following data, provided by the CDE, shows high school outcomes for students with disabilities, including the first class for which the alternate pathways policy was in effect.

<b>High school exits for students with an IEP</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>	<b>2023-24</b>	<b>2024-25</b>
Graduated with diploma	39,979	46,818	45,044	48,669	50,406
Graduated with diploma through the alternate pathway	NA	NA	NA	NA	467
Certificate of completion	4,962	3,779	5,463	6,679	6,639

***Alternate Pathways Workgroup noted need for support to implement this policy.*** The Alternate Pathways to a Diploma workgroup report recommended a significant increase in statewide guidance, training, and technical assistance, to allow greater access for students with disabilities to all existing traditional high school courses and pathways, with the expectation that most students will meet all state and local high school graduation requirements. Specifically, the report noted:

- The CDE will need to develop guidance for LEAs and IEP teams that outline the options they have within existing statute and regulation and encourage LEAs to allow IEP teams flexibility to plan a course of study, which may include a student with disabilities only meeting the state minimum requirements to receive a regular high school diploma. This includes looking at California EC Section 51225.3, which allows LEAs to adopt local graduation requirements that exceed the state minimum requirements and also requires LEAs to adopt alternate means for pupils to complete the prescribed course of study; and
- To ensure equitable and appropriate application of this pathway across the state, the state will need to establish guardrails through guidance and technical assistance for LEAs and IEP teams. If appropriate, the state should include these guardrails in the state IEP template, if adopted.

***The Committee may wish to consider that*** the state has not appropriated funding specifically for support and technical assistance to implement this policy, as this bill is proposing.

***Alternate Pathways report recommends phasing out certificates of completion.*** AB 1062 (Margett), Chapter 392, Statutes of 1999 established a “certificate of completion” for students with disabilities who met their IEP goals or participated in high school classes pursuant to their IEP. The bill was sponsored by the California Advisory Commission on Special Education. According to the Assembly Education Committee analysis, the author’s intent was expressed as follows:

Current law only allows the awarding of a diploma to pupils who have completed their required course of study and have met all standards of proficiency as determined by the school district. Most children with special needs have an IEP which has been designed to serve the educational and social needs of the pupil. Many times these criteria do not meet the standards of proficiency as established by the district and, although the pupil has met the requirements of his/her educational plan, they cannot be awarded a diploma. It is therefore our intentions to add the necessary language to the education code to allow the awarding of a certificate for those pupils that have met the alternate educational plan designed for their needs. This will allow pupils who have completed what they understand as their secondary education program, to have a sense of accomplishment and completion.

In the years since, the certificate of completion became viewed as a “track,” and LEAs often determine that students with disabilities are “on a diploma track” or “on a certificate track” as early as the end of elementary school. These decisions can have a significant impact on students’ academic opportunities.

The Alternate Pathways workgroup discussed the certificate of completion policy and noted in its report that:

Across the country, the practice of awarding certificates of completion originated because graduation frameworks did not have equitable opportunities for students with disabilities to pursue high school diplomas. Although Education Code 56391 provides that students who receive a certificate of completion are entitled to participate in the graduation ceremony, LEAs have at times been hesitant to allow students with disabilities the opportunity to do so without having a diploma-like document.

However, certificates of completion neither benefit states nor the students they serve. Certificates of completion are not recognized as either a regular high school diploma or state-defined alternate diploma by federal law and cannot be included in state ACGR calculations.

Certificates are also not accepted as a diploma equivalent for most postsecondary opportunities including employment, military service, or traditional four-year college pathways. As a result of having the certificate as a statutory option, many students with disabilities are presumed to be on a “non-diploma” or certificate path at a very young age and do not get access to the general education environment or appropriate grade-level coursework to even attempt to earn a high school diploma.

The report included the chart below to illustrate the differences between diplomas and Certificates of Completion:

<b>Characteristics of the High School Diploma vs. Certificate of Completion Characteristics</b>	<b>High School Diploma</b>	<b>Certificate of Completion</b>
Does the document signify that the student has completed a specific course of study?	Yes	No
Does the document allow access to basic postsecondary education or employment?	Yes	No
Is the document recognized in accountability systems?	Yes	No

The CDE notes that historically, students who have received a high school certificate of completion in lieu of a high school diploma have faced challenges when attempting to gain competitive integrated employment and access to postsecondary opportunities because the certificate of completion is not formally or widely recognized within the business communities or institutions of higher education.

***The Committee may wish to consider that*** the Alternate Pathways to a Diploma workgroup report recommended that California phase out the use of the state certificate of completion as a planned graduation pathway, especially as the state develops new and maximizes existing opportunities and pathways to a high school diploma for all students.

***Recommended Committee amendments.*** Staff recommends that this bill be amended to add the date of July 1, 2027 for the establishment of the statewide resource.

***Arguments in support.*** The Sacramento County Office of Education writes, “California has taken an important step in establishing a graduation pathway intended to ensure that every

learner, including students with significant cognitive disabilities, has a meaningful opportunity to earn a high school diploma.

However, fully realizing the intent of the original legislation that created this pathway requires more than policy; it requires clear guidance and technical assistance for local educational agencies (LEAs) responsible for implementing it.

Local education agencies are committed to providing rigorous and meaningful graduation pathways for students, but many need support to interpret the statute, design appropriate implementation practices, and ensure consistency and integrity across schools. Without coordinated technical assistance, the promise of this pathway risks uneven implementation across the state.

AB 2191 recognizes that effective implementation matters as much as the policy itself. By supporting technical assistance for LEAs, this bill helps ensure that the graduation pathway envisioned in statute becomes a practical and accessible option for students with disabilities across California.”

***Related legislation.*** AB 181 (Committee on Budget), Chapter 52, Statutes of 2022, establishes alternate pathways to a diploma for students with disabilities.

SB 74 (Committee on Budget and Fiscal Review), Chapter 6, Statutes of 2020, appropriated funding for the purpose of convening a workgroup to examine and propose alternative pathways to a high school diploma for students with disabilities.

AB 2121 (Garcia) of the 2021-22 Session would have established, subject to an appropriation, a special education resource lead project to provide training and technical assistance on family support and ADR in special education. This bill was held on the Assembly Floor.

#### **REGISTERED SUPPORT / OPPOSITION:**

##### **Support**

California County Superintendents  
Sacramento County Office of Education

##### **Opposition**

None on file

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