

Expanded Graduation Options for Students Experiencing Homelessness in California

This tip sheet:

- provides information about expanded high school graduation options available under California Education Code for students experiencing homelessness;
- recommends best practices for implementing California's expanded graduation options; and
- includes the following implementation tools:
 - [*LEA-Level Guiding Questions for Implementing California's Expanded Graduation Options for Students Experiencing Homelessness*](#)
 - [*Student-Level Strategies for Implementing California's Expanded Graduation Options*](#)
 - [*California Expanded Graduation Options Credit Worksheet*](#)
 - [*Notification of Eligibility for California Expanded Graduation Options*](#) (customizable by LEA)
 - [*Notification of California Expanded Graduation Option Selection*](#) (customizable by LEA)

Context

[Research](#) has found that the single greatest factor placing youth at risk for experiencing homelessness is the lack of a high school credential; in fact, youth with less than a high school diploma or General Educational Development (GED) Test have a 346% greater risk of experiencing homelessness than their peers who complete high school (Morton et al, 2017, p. 12). In addition to serving as an important protective factor against future experiences of homelessness, graduating high school also helps equip students who are experiencing homelessness with a basic credential needed to secure living wage employment, pursue post-secondary education, if desired, and make a sustainable exit from homelessness; and yet, students experiencing homelessness in California (hereafter *McKinney-Vento students*) have graduation rates that are significantly lower than the overall statewide graduation rate — 72.9% vs. 87.0%, respectively (California Department of Education [CDE], 2022, p. 3).

While the federal [McKinney-Vento Homeless Assistance Act](#) and California Education Code provide school stability for students experiencing homelessness through their school of origin provisions (42 U.S.C. § 11432(g)(3)(A); Cal. Educ. Code § 48852.7), McKinney-Vento students experience higher than average rates of residential and school mobility (Dhaliwal et al., 2021). Many McKinney-Vento students find themselves transferring schools, often across local educational agency (LEA) lines, multiple times over the course of their educational career. Each school or LEA transfer may result in different coursework offerings and graduation requirements, creating educational discontinuity and interrupting student progress toward high school graduation. Acknowledging this, the California Legislature enacted [California Education Code § 51225.1](#) — as amended by Assembly Bill (AB) 1806 and Senate Bill (SB) 532 — to expand options for highly mobile students¹, including McKinney-Vento students, to earn a high school diploma by providing alternatives to standard graduation requirements and timelines.



¹ While this tip sheet focuses on students experiencing homelessness, California Education Code § 51225.1 also provides expanded graduation options to the following highly mobile student groups: students in foster care, former juvenile court school students, students who are part of a military family, migrant students, and newcomer students.

This tip sheet will help educators, service providers, and advocates understand the expanded graduation options available to McKinney-Vento students and ensure these students have access to related information and support.

Exemption from LEA Graduation Requirements

Under California law, LEAs must exempt a McKinney-Vento student who transfers schools any time after the completion of the student's second year of high school from all coursework and other requirements adopted by the LEA that are in addition to [statewide requirements](#), unless the LEA finds that the student is reasonably able to complete the LEA's graduation requirements in time to graduate from high school by the end of the student's fourth year [Cal. Educ. Code § 51225.1(a)]. LEAs must make a determination of exemption eligibility within 30 days of the date that a McKinney-Vento student transfers into a school within the LEA [Cal. Educ. Code § 51225.1(d)(2)(A)].

Educational Decision Makers

California Education Code § 51225.1 references the "person holding the right to make educational decisions for the pupil" (hereafter *educational decision maker*) multiple times throughout the statute as detailed in this tip sheet. In most cases, a student's parent or legal guardian will serve as the student's educational decision maker. There are instances, however, where California Education Code § 51225.1 grants the student the right to serve as their own educational decision maker, including in the case of an unaccompanied youth [Cal. Educ. Code § 51225.1(q)], a student who is 18 years of age or older, or an unaccompanied minor who holds their own education rights [Cal. Educ. Code § 51225.1(r)].

California Education Code § 51225.1 uses the definition of *unaccompanied youth* established in the education subtitle of the federal McKinney-Vento Homeless Assistance Act at 42 U.S.C. §11434a(6), which reads: 'The term "unaccompanied youth" includes a homeless child or youth not in the physical custody of a parent or guardian.' To learn more about supporting the education and well-being of youth experiencing homelessness on their own, visit the HETAC's [unaccompanied homeless youth webpage](#).

Exemption Eligibility

A student must meet the following criteria to be eligible for the exemption:

1. The student must be experiencing homelessness [as defined by Subtitle VII-B of the McKinney-Vento Homeless Assistance Act](#) [Cal. Educ. Code § 51225.1(a)].
2. The student must have transferred schools after their second year of high school [Cal. Educ. Code § 51225.1(a)]. To determine whether a McKinney-Vento student is in the third or fourth year of high school, the LEA may use whichever of the following will qualify the student:
 - the number of credits the student has earned to the date of transfer;
 - the length of the student's school enrollment; or
 - for students with significant gaps in school attendance, the student's age as compared to the average age of students in the third or fourth year of high school [Cal. Educ. Code § 51225.1(c)].
3. The student must be unable to reasonably complete the LEA's graduation requirements in time to graduate from high school by the end of the student's fourth year [Cal. Educ. Code § 51225.1(a)].

An LEA may not require or request that a McKinney-Vento student transfer schools in order to qualify for the exemption [Cal. Educ. Code § 51225.1(k)]; further, a McKinney-Vento student, the student's educational decision maker,² or the LEA homeless liaison may not request a transfer solely to qualify the student for the exemption [Cal. Educ. Code § 51225.1(l)(2)].

If a McKinney-Vento student is exempted from LEA graduation requirements and completes statewide requirements before the end of the student's fourth year in high school, and the student otherwise would be entitled to continue attending the school, the school or LEA may not require or request that the student graduate before the end of their fourth year of high school [Cal. Educ. Code § 51225.1(e)].

Notification of Exemption from LEA Graduation Requirements

Within 30 calendar days of the date that a McKinney-Vento student who may qualify for the exemption from LEA graduation requirements transfers into a school, the LEA must notify the student, the student's educational decision maker, and the [LEA homeless liaison](#) of the availability of the exemption and whether the student qualifies. If the LEA fails to provide timely notice, the student will be eligible for the exemption from LEA graduation requirements once notified, even if that notification occurs after the student is no longer experiencing homelessness if the student otherwise qualifies for the exemption [Cal. Educ. Code § 51225.1(d)(2)].



TOOL: See the [Notification of Eligibility for California Expanded Graduation Options](#) customizable template below.

Consultation Regarding Exemption from LEA Graduation Requirements

If a McKinney-Vento student is eligible to be exempted from LEA graduation requirements, the LEA must consult with the student and the student's educational decision maker regarding

1. how waived requirements may affect the student's postsecondary education or vocation plans, including the ability to gain admission to a postsecondary educational institution;
2. other options available to the student, including, but not limited to, a fifth year of high school, possible credit recovery, and any transfer opportunities available through the California Community Colleges; and
3. the student's academic data and any other information relevant to making an informed decision on whether to accept the exemption [Cal. Educ. Code § 51225.1(f)].



TOOL: See the [Notification of California Expanded Graduation Option Selection](#) customizable template below.

Meeting LEA Graduation Requirements in the Fifth Year of High School

If an LEA determines that an exemption-eligible McKinney-Vento student is reasonably able to complete all LEA graduation requirements within the student's fifth year of high school, the LEA must

² In some instances—including when the student is an unaccompanied youth, has reached the age of majority, or has been legally emancipated—the student serves as their own educational decision maker.

1. consult with the student and the student's educational decision maker about the student's option to remain in school for a fifth year to complete LEA graduation requirements [Cal. Educ. Code § 51225.1(b)(1)],
2. consult with the student and the student's educational decision maker about how remaining in school for a fifth year to complete LEA graduation requirements will affect the student's ability to gain admission to a postsecondary educational institution [Cal. Educ. Code § 51225.1(b)(2)],
3. consult with and provide information to the student about transfer opportunities through the California Community Colleges [Cal. Educ. Code § 51225.1(b)(3)],
4. permit the student to stay in school for a fifth year to complete LEA graduation requirements upon agreement with the student or the student's educational decision maker (if different from the student) [Cal. Educ. Code § 51225.1(b)(4)], and
5. consult with the student and the student's educational decision maker about the student's option to remain in the school of origin under Cal. Educ. Code § 48852.7 [Cal. Educ. Code § 51225.1(b)(5)].

Exemption from LEA Graduation Requirements in the Fifth Year of High School



If an LEA determines that an exemption-eligible McKinney-Vento student is not reasonably able to complete LEA graduation requirements within the student's fifth year of high school, but is reasonably able to complete the statewide requirements within the fifth year, the LEA must provide the student the option to remain in school for a fifth year to complete statewide requirements [Cal. Educ. Code § 51225.1(n)(1)]. In this case, the LEA must consult with the student and the student's educational decision maker about

1. the student's option to remain in the school for a fifth year to complete statewide requirements [Cal. Educ. Code § 51225.1(n)(1)(A)];
2. how waiving local requirements and remaining in school for a fifth year may affect the student's postsecondary education or vocation plans, including the ability to gain admission to an institution of higher education [Cal. Educ. Code § 51225.1(n)(1)(B)];
3. whether any other options are available to the student, including, but not limited to, possible credit recovery, and any transfer opportunities available through the California Community Colleges [Cal. Educ. Code § 51225.1(n)(1)(C)]; and
4. the student's academic data and any other information relevant to making an informed decision about whether to accept the exemption from LEA graduation requirements and the option to remain in school for a fifth year to complete the statewide requirements [Cal. Educ. Code § 51225.1(n)(1)(D)].

Reevaluation of Exemption Eligibility

If a McKinney-Vento student is not eligible for an exemption from LEA high school graduation requirements in the year in which the student transfers between schools because the LEA finds that the student is reasonably able to complete the LEA's requirements in time to graduate by the end of the student's fourth year, the LEA must reevaluate eligibility and provide written notice to the student and the student's educational decision maker as to whether the student qualifies for an exemption within the first 30 calendar days of the following academic year. This reevaluation will be based on the student's course completion status at the time of reevaluation to determine if the student is still reasonably able to

complete the LEA's graduation requirements in time to graduate from high school by the end of the student's fourth year [Cal. Educ. Code § 51225.1(o)(1)].

If it is determined within the first 30 calendar days of the following year that, given the student's course completion status at the time of reevaluation, the student is not reasonably able to complete the LEA's graduation requirements in time to graduate by the end of the student's fourth year, the LEA must provide the student with consultation on the options available to them outlined above.

Continued Exemption Eligibility

If a McKinney-Vento student initially is not exempted from LEA graduation requirements or has previously declined the exemption, an LEA shall exempt the student at any time if an exemption is requested by the student or the student's educational decision maker and the student qualifies for the exemption. If a McKinney-Vento student who was eligible for an exemption from LEA graduation requirements was not properly notified of the availability of the exemption or declined the exemption, an LEA nonetheless must exempt the student within 30 days of the date of the exemption request, if an exemption is requested by the student or the student's educational decision maker, and the student at one time qualified for the exemption, even if the student is no longer experiencing homelessness [Cal. Educ. Code § 51225.1(h)].

Further, if a McKinney-Vento student is exempted from LEA graduation requirements, the exemption will continue to apply after the student is no longer experiencing homelessness while the student is enrolled in school or if the student transfers to another school or district [Cal. Educ. Code § 51225.1(j)(2)].A

Adult Education Students

Expanded graduation options under California Education Code § 51225.1 apply to students experiencing homelessness who are enrolled in an adult education program, regardless of the student's age; they also apply to students enrolled in an adult education program who experienced homelessness while enrolled in high school [Cal. Educ. Code § 51225.1(p)].

Prohibited Actions

Prohibition Against Requiring Exemption or Denying Enrollment

A McKinney-Vento student who is eligible for the exemption from LEA graduation requirements and otherwise would be entitled to continue attending the school must not be required to accept the exemption or be denied enrollment in, or the ability to complete, courses for which the student otherwise is eligible, including courses needed to attend an institution of higher education, regardless of whether those courses are required for statewide graduation requirements [Cal. Educ. Code § 51225.1(g)].

It is at the sole discretion of the student or the student's educational decision maker (if different from the student) whether to accept the exemption based on the student's best educational interests [Cal. Educ. Code § 51225.1(r)].

Prohibition Against Revoking the Exemption

If a student experiencing homelessness is exempted from LEA graduation requirements, a district may not revoke the exemption [Cal. Educ. Code § 51225.1(i)].

Additional Statutory Provisions

View the [full text of California Education Code § 51225.1](#) for additional information on implementing California's expanded graduation options, including

- filing a complaint of noncompliance [Cal. Educ. Code § 51225.1(m)],
- LEA responsibilities to report data annually to the California Department of Education (CDE) on the number of students exempted from the LEA's graduation requirements [Cal. Educ. Code § 51225.1(s)], and
- definitions of terms used [Cal. Educ. Code § 51225.1(t)].

References

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LEA-Level Guiding Questions for Implementing California's Expanded Graduation Options for Students Experiencing Homelessness

LEAs should establish a clear protocol for identifying McKinney-Vento students who have transferred schools after their second year of high school and informing them of all graduation pathways available to them under Cal. Educ. Code § 51225.1. The considerations below may be helpful when developing and implementing this protocol.

IDENTIFYING ELIGIBLE STUDENTS

- What process will the LEA use for identifying McKinney-Vento students who have transferred schools after their second year of high school (hereafter *eligible students*)?
- How will the LEA ensure that all eligible students are identified promptly?
- How will the LEA document that a student has been deemed eligible?
- How will the LEA ensure a seamless transition of eligibility when a student was deemed eligible by a previously attended LEA?

TOOL: See the [Notification of Eligibility for California Expanded Graduation Options](#) template below.

ANALYZING CREDITS AND REASONABILITY

- How will the LEA determine whether a student is reasonably able to complete LEA graduation requirements that are in addition to statewide requirements within either four or five years?
- What process will the LEA use for conducting an analysis of credits for eligible students to identify all possible graduation options available to each eligible student (e.g. LEA diploma in four years, state diploma in four years, LEA diploma in five years, and/or state diploma in five years)?

TOOL: See the [California Expanded Graduation Options Credit Worksheet](#) below.

DOCUMENTING OPTION NOTIFICATION, CONSULTATION, AND CHOICE

- How will the LEA document that it has notified all eligible students and consulted with them and their educational decision maker (if different from the student*) about all possible graduation options available to the student?

- How will the LEA ensure that the student and educational decision maker understand the potential advantages and disadvantages of each graduation pathway available to the student?
- How will the LEA support the student and educational decision maker in determining which pathway is in the student's best interest?
- How will the LEA document the educational decision maker's choice of graduation pathway for eligible students?

TOOL: See the [Notification of California Expanded Graduation Option Selection](#) template below.

REVISITING GRADUATION OPTION ELIGIBILITY AND CHOICE

- What process will the LEA use for reevaluating graduation options for McKinney-Vento students who did not receive an exemption from LEA graduation requirements in the year in which the student transferred schools because the LEA found that the student was reasonably able to complete the LEA's graduation requirement in time to graduate by the end of the student's fourth year, but who may no longer be on track to meet LEA graduation requirements within that timeframe?
- What process will the LEA use for ensuring that eligible students who wish to choose a previously declined graduation pathway are notified of their ability to do so and supported in selecting the graduation pathway that is in the student's best interest?

*In some instances—including when the student is an unaccompanied youth, has reached 18 years of age, or is an unaccompanied minor who holds their own education rights—the student serves as their own educational decision maker.

Student-Level Strategies for Implementing California's Expanded Graduation Options*

STEP 1: GATHER TRANSCRIPTS AND ANALYZE CREDITS

Upon receiving notification that a McKinney-Vento student has enrolled in your high school, gather complete transcripts, including partial credits, from all high schools the student has attended.

If it appears the student was not awarded partial credits properly by a previous school based on enrollment dates, attendance records, and check-out grades, contact the [local educational agency \(LEA\) homeless liaison](#) in all previous districts to discuss the awarding of partial or full credit under [California Education Code § 51225.2](#). See the California Homeless Education Technical Assistance Center's [credit accrual webpage](#) for more information.

STEP 2: DETERMINE IF THE STUDENT HAS COMPLETED THE SECOND YEAR OF HIGH SCHOOL

Determine whether the enrolling student completed the second year of high school based on whichever of the following will qualify the student:

- the number of credits the student has earned to the date of transfer;
- the length of the student's school enrollment; or
- for students with significant gaps in school attendance, the student's age as compared to the average age of students in the third or fourth year of high school.

STEP 3: CONDUCT A CREDIT ANALYSIS

Analyze the student's credits as compared to your LEA's graduation requirements that are in addition to the [statewide requirements](#) to determine which graduation pathway(s) under Cal. Educ. Code § 51225.2 may be an option for the student:

- ☐ LEA diploma in four years
- ☐ State diploma in four years (exempt from additional LEA requirements)
- ☐ LEA diploma in five years
- ☐ State diploma in five years (exempt from additional LEA requirements)

TOOL: See the [California Expanded Graduation Options Credit Worksheet](#) below.

STEP 4: NOTIFICATION AND CONSULTATION

Notification: After analyzing the student's credits, provide written notification of the student's eligibility for expanded graduation options to the student, the student's educational decision maker (if different from the student*), and the [LEA homeless liaison](#).

TOOL: See the [Notification of Eligibility for California Expanded Graduation Options](#) template below.

Consultation: In addition to providing notification, LEAs must consult with the student and the student's educational decision maker (if different from the student) about

- ☐ expanded graduation option(s) available to the student;
- ☐ how flexibilities under available expanded graduation options (whether receiving a state diploma or graduating in five years) may affect the student's postsecondary education or vocation plans, including the ability to gain admission to a postsecondary educational institution;
- ☐ any other options available to the student, including, but not limited to, possible credit recovery, and any transfer opportunities available through the California Community Colleges; and
- ☐ the student's academic data and any other information relevant to making an informed decision on which graduation pathway is in the student's best interest.

TOOL: See the [Notification of California Expanded Graduation Option Selection](#) template below.

STEP 5: ENSURE PROPER COURSE ENROLLMENT

If the student's educational decision maker opts the student into one of California's expanded graduation pathways, ensure that the student is enrolled in the appropriate courses to complete that pathway's graduation requirements. See the [Graduation Credit Worksheet](#) for more information.

*In some instances—including when the student is an unaccompanied youth, has reached 18 years of age, or is an unaccompanied minor who holds their own education rights—the student serves as their own educational decision maker.

California Expanded Graduation Options Credit Worksheet*

State Requirements	LEA Requirements	Credits Completed	State Credits Remaining	LEA Credits Remaining
English 3 years/30 credits**	<<add here>>	<<add here>>	<<add here>>	<<add here>>
Mathematics 2 years/20 credits - Algebra I (10 credits) - Other Math (10 credits)	<<add here>>	<<add here>>	<<add here>>	<<add here>>
Social Science 3 years/30 credits - U.S. history and geography (10 credits) - World history, culture, and geography (10 credits) - American government (5 credits) - Economics (5 credits)	<<add here>>	<<add here>>	<<add here>>	<<add here>>
Science 2 years/20 credits - Biology (10 credits) - Physical science (10 credits)	<<add here>>	<<add here>>	<<add here>>	<<add here>>
Physical Education 2 years/20 credits)	<<add here>>	<<add here>>	<<add here>>	<<add here>>
Foreign Language, Visual or Performing Arts, or Career Technical Education 1 year/10 credits	<<add here>>	<<add here>>	<<add here>>	<<add here>>
TOTAL: 130 credits	<<add here>>	<<add here>>	<<add here>>	<<add here>>

*Adapted from the Alliance for Children's Rights' *Foster Youth Education Toolkit*

**While Cal. Educ. Code § 51225.3 lists state graduation requirements by year-long courses, this worksheet lists number of required credits given that students experiencing homelessness often must piece together partial credits from multiple courses to meet these requirements.

<<Add Local Educational Agency Name>>
Notification of Eligibility for California Expanded Graduation Options

Local educational agencies (LEAs) may use this form to document whether a student is eligible for expanded high school graduation options under California Education Code § 51225.1 and, if eligible, which graduation pathway has been selected in keeping with the student's best interest. LEAs must make a determination of exemption eligibility within 30 days of the date that a student transfers into a school within the LEA.

Eligibility for Expanded Graduation Options

Under California Education Code § 51225.1, student groups who are more likely to experience school mobility (changing schools) and educational disruption may qualify for expanded options to graduate high school. These student groups ("students in transition") include **students in foster care, students experiencing homelessness, former juvenile court school students, students who are part of a military family, and migrant students**. To qualify for expanded graduation options, the student must

- be in one of the students in transition groups listed above,
- have transferred schools after their second year of high school, and
- be unable to reasonably complete the LEA's graduation requirements in time to graduate from high school by the end of the student's fourth year.

Student Information

Student name:	Student ID:
Address:	Date of Birth:
Current high school:	Enrollment date:
Grade level:	
Educational decision maker name*:	Phone:
Probation officer/Social worker (if applicable) :	Phone:

Determination of Eligibility for Expanded High School Graduation Options

After a careful review of the student's educational records, the LEA has determined that the above-named student:

	IS ELIGIBLE for expanded graduation options under California Education Code § 51225.1. <i>(If eligible, continue to the next page to document the expanded graduation option selected)</i>
	IS NOT ELIGIBLE for expanded graduation options under California Education Code § 51225.1 because
	the student is not considered a student in transition
	the student has not completed two years of high school
	the student did not transfer to a new school after completing two years of high school
	the student is reasonably able to complete the LEA's graduation requirements in time to graduate from high school by the end of the student's fourth year

LEA Representative Name and Title: _____

LEA Representative Signature: _____ Date: _____

The LEA should file the original document in the student's cumulative folder, file a copy with the LEA student services office, and provide a copy to the student and the student's educational decision maker. **In some instances—including when the student is an unaccompanied youth, has reached 18 years of age, or is an unaccompanied minor who holds their own education rights—the student serves as their own educational decision maker.*

<<Add Local Educational Agency Name>>
Notification of California Expanded Graduation Option Selection

Expanded Graduation Pathway Options

Under California Education Code § 51225.1, eligible students in transition can graduate from high school by

- completing California state graduation requirements by the end of the student's fourth year of high school,
- remaining in high school for a fifth year and completing LEA graduation requirements, or
- remaining in high school for a fifth year and completing California state graduation requirements.

Consultation Regarding Expanded Graduation Pathway Options

LEAs must consult with the student and the student's educational decision maker (if different from the student*) about the expanded graduation pathway options available to the student and the possible advantages and disadvantages of each pathway option, including possible effects on the student's postsecondary education or vocation plans, other options available to the student (e.g. possible credit recovery), transfer opportunities available through California Community Colleges, and any other information relevant to making an informed decision that is in the best interest of the student.

Graduation Pathway Selection

After consulting with the LEA about available graduation pathway options, the following pathway has been selected for the student named below based on the student's best interest.

	California state diploma in four (4) years (does not need to meet additional LEA requirements) Student initials _____ Educational decision maker initials _____
	LEA diploma in five (5) years Student initials _____ Educational decision maker initials _____
	California state diploma in five (5) years (does not need to meet additional LEA requirements) Student initials _____ Educational decision maker initials _____

Student name:	
Student signature:	Date:
Educational decision maker name*:	
Educational decision maker signature:	Date:
LEA representative name:	
LEA representative title:	
LEA representative signature:	Date:

The above-named student and/or educational decision maker may choose a different graduation pathway than the one selected above at any time before the student graduates high school based on the best interest of the student by contacting <<add contact name and information here>>. The student and educational decision maker should keep a copy of this document and provide it to any future California high school the student attends if the student changes schools.

The LEA should file the original document in the student's cumulative folder, file a copy with the LEA student services office, and provide a copy to the student and the student's educational decision maker. **In some instances—including when the student is an unaccompanied youth, has reached 18 years of age, or is an unaccompanied minor who holds their own education rights—the student serves as their own educational decision maker.*