



ARIZONA DEPARTMENT OF EDUCATION

Memorandum

To: Public Education Agencies (PEAs)

From: ADE Exceptional Student Services and ADE Educator Preparation and Certification

Date: September 1, 2026

Re: Guidance to PEAs regarding federal requirements for special education personnel and Grow Your Own (GYO) programs

The Arizona Department of Education (ADE) Exceptional Student Services (ESS) and Educator Preparation and Certification sections issue this guidance to support Public Education Agencies (PEAs) in delivering specially designed instruction (SDI) to students with disabilities. Specifically, this guidance provides clarification related to:

- Required qualifications for personnel who provide special education services under the Individuals with Disabilities Education Act (IDEA), the Every Student Succeeds Act (ESSA), and state certification standards to ensure compliant and effective service delivery
- Grow Your Own (GYO) programs and appropriate use of paraprofessionals or Alternative Teaching certificate holders
- Substitute certificate holders

IDEA Requirements for Special Education Teachers

IDEA¹ requires that states ensure special education personnel are appropriately and adequately prepared and trained, including that those personnel have the content knowledge and skills to serve children with disabilities. Special education teachers must hold:

- A bachelor's degree, and
- Full state certification as a special education teacher (including certification obtained through an approved alternative route).

¹ [34 CFR § 300.156](#)



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Individuals may assume the functions of a special education teacher under an alternative route to certification if the teacher:

1. Receives high-quality professional development that is sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction, before and while teaching
2. Participates in a program of intensive supervision that consists of structured guidance and regular ongoing support for teachers or a teacher mentoring program
3. Assumes functions as a teacher for only a specified period of time not to exceed three years; and
4. Demonstrates satisfactory progress toward full certification as prescribed by the State

Individuals that hold an emergency certificate are not considered appropriately certified to assume the functions of a special education teacher.

ESSA Requirements for Special Education Teachers

ESSA removed the “Highly Qualified Teacher” mandates under the No Child Left Behind Act and deferred to individual states to determine the specific certificate or endorsement required for a teaching position. In response, the Arizona State Board of Education adopted the [*Certification Guidelines for Teaching Assignments*](#), which provides detailed information regarding the required certificate or endorsement for a teaching position. PEAs should refer to this document when staffing a special education teaching position to ensure that a candidate holds the appropriate certification for the assignment.

Grow Your Own Programs

A Grow Your Own (GYO) program is a workforce development strategy designed to recruit, prepare, and retain educators from local communities and existing school staff. When developing a special education GYO program, public education agencies should ensure alignment with requirements under the Individuals with Disabilities Education Act (IDEA)², the Every Student Succeeds Act (ESSA), and State requirements.

² [34 CFR § 300.156](#)



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Paraprofessionals Participating in GYO Programs

Paraprofessionals participating in Grow Your Own (GYO) programs play an important role in supporting students with disabilities while working toward teacher certification. Under the Individuals with Disabilities Education Act (IDEA)³, paraprofessionals may assist in the delivery of special education services when they are appropriately trained and supervised by a certified special education teacher. Paraprofessionals may not independently deliver specially designed instruction or serve as the teacher of record until they obtain the required certification.

Alternative Teaching Certificate Holders

If a participant in a GYO program or an educator preparation program is serving as the special education teacher of record and/or delivering specially designed instruction while completing their educator preparation program, the following conditions must be met:

- The individual must hold a valid [Alternative Teaching Certificate](#), which requires a bachelor's degree and verification of enrollment in a [state-approved special education teacher preparation program](#).
- The individual must be continuously enrolled in the state-approved special education teacher preparation program.
- The individual must receive high-quality professional development that is sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction, before and while teaching
- The individual must participate in a program of intensive supervision that consists of structured guidance and regular ongoing support for teachers or a teacher mentoring program
- The individual must demonstrate satisfactory progress toward full certification as prescribed by the State and complete their Standard Professional Teaching Certificate in special education or Classroom-based Standard Professional Teaching Certificate in special education within three years.

³ [20 U.S.C. § Section 1412\(a\)\(14\)](#)



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Substitute Certificate Holders

Substitute and Emergency Substitute certificate holders do **not** meet the federal requirements to assume the functions of a special education teacher. In accordance with IDEA, Arizona Revised Statutes⁴, and Arizona State Board of Education rules⁵, substitutes can be in a classroom with students with disabilities if all of the following apply:

- They are temporarily covering for the regular teacher
- A certified special education teacher remains responsible for:
 - IEP implementation
 - SDI planning
 - Progress monitoring
 - Oversight/supervision

As applicable, PEAs must follow any and all notification requirements as outlined in accordance with 34 CFR §200.61⁶; 20 U.S.C. § 6312(e)(1)(B).

Resources:

[Become an Educator | Arizona Department of Education](#)

[Certification Guidelines for Teaching Assignments](#)

[Monitoring Alert: March 2018 Specially Designed Instruction \(SDI\) by Non-Special Education Providers | Arizona Department of Education Exceptional Student Services](#)

[Special Education Teaching Certification Pathways | Arizona Department of Education](#)

⁴ [A.R.S. 15-763](#)

⁵ [A.A.C.R7-2-614](#)

⁶ [34 CFR §200.61](#)