



# Tennessee 1% Waiver Extension Request:

English Language Arts, Mathematics, and  
Science

20 U.S.C. § 6311(b)(2)(D) and 34 C.F.R. § 200.6(c) and (d)

Tennessee Department of Education

June 2025

## Introduction

Title I, Part A of the Elementary and Secondary Education Act of 1965, amended by the Every Student Succeeds Act (ESSA<sup>1</sup>) of 2015, includes requirements associated with alternate assessments based on alternate academic achievement standards for students with the most significant intellectual disabilities. ESSA requires State Education Agencies (SEAs) anticipating exceeding 1 percent participation in alternative assessments in English Language Arts (ELA), mathematics, or science to submit a 1 percent cap waiver request to the U.S. Department of Education (ED).

A review of longitudinal participation data shows the percentage of students participating in the alternative assessment by content area in grades 3–8 and high school (SY) 2017-18 through 2024-25. Based on the state-level data, participation for 2024-25 in English Language Arts (ELA) decreased by 0.15 percent, mathematics decreased by 0.14 percent, and science alternative assessment participation increased by 0.01 percent.

Table 1: Percentage of Students Participating in the Alternative Assessment Over Time

Subject	2017-18	2018-19	2020-21	2021-22	2022-23	2023-24	Projected 2024-25	Change this year
ELA	1.42	1.45	1.35	1.35	1.36	1.44	1.29	-0.15
Math	1.43	1.47	1.36	1.36	1.36	1.45	1.31	-0.14
Science	1.36	*Field test	1.33	1.33	1.38	1.41	1.42	+0.01

*The 2024-25 Projected Rates were calculated using new business rules aligned to the changes in ED Facts reporting and in accordance with feedback from USDOE on the Tennessee Waiver Request submitted in September 2024.*

Tennessee was denied the most recent waiver request due to demonstrating a lack of sufficient progress in reducing the rates for participation in ELA, mathematics, and science alternative assessments statewide. However, Tennessee has continued to work on the state plan from the previously submitted waiver to reduce the 1 percent gap.

Analysis of current individual education program (IEP) data specific to eligibility for alternative assessment and state enrollment data was conducted to project the 2025-26 statewide participation rate. Based on this internal analysis, Tennessee anticipates a participation rate of 1.32 percent overall for the 2025-26 school year using current enrollment data. Thus, Tennessee requests a waiver for the 2025-26 school year.

<sup>1</sup> Every Student Succeeds Act: Elementary and Secondary Education Act, 20 U.S.C. § 6301 *et seq.* (2015): <https://www2.ed.gov/about/offices/list/oii/nonpublic/eseareauth.pdf>

The Tennessee Department of Education (department) continues collaborating with national technical assistance partners as we seek to implement innovative approaches to ensure only students with the most significant disabilities participate in the alternative assessments. Under the direction of the Assistant Commissioner of Special Education and Student Supports, the Senior Manager of Professional Learning and Low Incidence Disabilities has led the strategy to reduce the 1 percent participation rate by addressing professional learning needs, providing targeted technical assistance, conducting reviews of Local Education Agency (LEA) plans, reviewing reports from the statewide data and monitoring system, TN PULSE, and providing guidance to cross-department teams including the assessment and accountability team. The department lead actively participates in professional learning activities and statewide networking opportunities to ensure it provides universal and targeted LEA support, guidance, and technical assistance. Beginning with the 2025-26 school year, the department's IDEA APR Support Team will provide additional support to LEAs relative to decision-making for alternate assessment eligibility and LRE related. The IDEA APR team will be the lead contact for the state plan to reduce alternate assessment participation to 1%.

The department activities in the state plan include:

- Support LEA data analysis to predict alternate assessment trends
- Provide tools for APR Indicator 3 and 5 analysis
- Participation in the National Center for Educational Outcomes (NCEO) 1 percent Collaborative
- Participation in State Collaborative for Assessment, Standards, and Education of Students with Disabilities (ASES)
- Participate in the ASES Steering Committee
- Membership in the Dynamic Learning Maps Working Group
- Participate in the Dynamic Learning Maps Governance

While the department is committed and continues to work to reduce the percentage of students who participate in the alternative assessment, we are also focused on ensuring that all students have access to their Least Restrictive Environment (LRE) and are administered the most appropriate assessment relative to their individual needs. To this extent, the department provides numerous opportunities for professional learning and technical assistance to ensure that IEP teams are making instructional and assessment decisions based on individual student data, providing students with appropriate, allowable accommodations to ensure access to grade-level content and opportunity to demonstrate learning, and understanding and accurately using the criteria to determine which students should participate in alternative assessments. The department strategy, Acceleration for All, is focused on access to tier I instruction and includes strategies for learners with significant cognitive disabilities.

In addition to the activities described above, the department has engaged in the following activities to reduce the percentage of students participating in the alternative assessment.

- 1) Providing district special education leadership with guidance on Dynamic Learning Maps (DLM) performance data reports
- 2) Revised functionality and guidance for the statewide IEP data management and monitoring system, TN PULSE.
- 3) Focused professional development on developing appropriate measurable annual goals, transition plans, and IEP services.
- 4) Focused professional development on using the statewide progress monitoring tool embedded in TN PULSE.
- 5) Updated universal and targeted professional development resources and guidance documents.
  - a. Instructionally Appropriate IEP
  - b. Alternate Assessment Participation: Eligibility and Instructional Considerations
  - c. Alternate Assessment: The Federal Cap of 1 percent and Implications of Participation
  - d. Alternate Assessment: Criterion 1, 2, and 3 Considerations Guides
  - e. Alternate Assessment IEP File Review Rubric
  - f. Simplifying the Complexities of Course Codes, Endorsements and Diplomas
  - g. Diploma Options (Family Engagement)
  - h. Inclusion of slides on the impact of modifications, including alternate assessment participation in IEP professional development.
- 6) A current state personnel development grant (SPDG) focused on increasing access to general education, tier I instruction for students with cognitive disabilities.

As specified in ESSA, LEAs that are expected to exceed the one percent participation cap must complete and submit a justification and assurances. The department communicates this expectation with all 149 LEAs by multiple avenues including the monthly Special Education and Student Support Newsletter, monthly Special Education Supervisor Calls, regional in-person leadership summits, Federal Programs Oversight Newsletter, and communication by Special Education CORE Consultants at monthly SPED Supervisor Study Councils. Additionally, the Special Education Program subject matter experts provide universal, targeted, and intensive supports to LEAs as determined by need or request.

### **One Percent Cap Waiver Extension Request Requirements**

**Requirement 1** (34 C.F.R. § 200.6(c)(4)(i)): Submit the waiver request at least 90 days before the testing window starts for the relevant subject.

Tennessee transitioned to the Dynamic Learning Maps (DLM) from the Multi-State Collaborative Alternative Assessment (MSAA) during late fall of the 2023-24 school year. DLM Instructionally Embedded (IE) assessments offer two administrations during a school year.

- Fall administration window: September 8–December 19, 2025
- Spring administration window: February 2–May 15, 2026

The deadline for submission 90 days prior to administration is June 10, 2025. The department met this requirement, submitting the waiver request on XXXX, 2025.

**Requirement 2** 34 C.F.R. § 200.6(c)(4)(ii): Provide state-level data from the current or previous year that shows the number and percent in each subgroup who took the alternative assessment in the subject area.

- The number and percentage of students in each subgroup of students who took the alternative assessment aligned with alternative academic achievement standards.

Table 3: SY 2023-24 ELA Alternate Assessment Participation Rate by Student Group

<b>ELA 3-8 and High School</b>			
<b>Student Group</b>	<b>Total Students Assessed</b>	<b>Total Assessed in Alternative Assessment</b>	<b>Percent Assessed in the Alternate Assessment</b>
<b>All Students</b>	517,486	7,474	1.44%
<b>Hispanic</b>	79,021	922	1.17%
<b>American Indian/Alaskan Native</b>	2,506	35	1.40%
<b>Asian</b>	14,620	206	1.41%
<b>Black</b>	121,911	2,516	2.06%
<b>Hawaiian/Pacific Islander</b>	1,429	16	1.12%
<b>White</b>	297,998	3,779	1.27%
<b>Two or More Races</b>	N/A	N/A	N/A

<b>Unknown Races</b>	1	0	0.00%
<b>Male</b>	265,453	5,062	1.91%
<b>Female</b>	252,033	2,412	0.96%
<b>Unknown Gender</b>	0	0	0.00%
<b>English Learner</b>	38,467	302	0.79%
<b>Economically Disadvantaged</b>	159,306	2,943	1.85%

Table 4: SY 2023-24 Mathematics Alternate Assessment Participation Rate by Student Group

<b>Mathematics 3-8 and High School</b>			
<b>Student Group</b>	<b>Total Students Assessed</b>	<b>Total Assessed in Alternative Assessment</b>	<b>Percent Assessed in the Alternate Assessment</b>
<b>All Students</b>	512,173	7,427	1.45%
<b>Hispanic</b>	80,099	915	1.14%
<b>American Indian/Alaskan Native</b>	2,436	34	1.40%
<b>Asian</b>	13,820	204	1.48%
<b>Black</b>	121,489	2,508	2.06%
<b>Hawaiian/Pacific Islander</b>	1,405	16	1.14%

<b>White</b>	292,924	3,750	1.28%
<b>Two or More Races</b>	N/A	N/A	N/A
<b>Unknown Races</b>	0	0	0.00%
<b>Male</b>	262,676	5,027	1.91%
<b>Female</b>	249,497	2,400	0.96%
<b>Unknown Gender</b>	0	0	0.00%
<b>English Learner</b>	40,820	302	0.74%
<b>Economically Disadvantaged</b>	160,562	2,927	1.82%

Table 5: Science Alternate Assessment Participation Rate by Student Group

<b>Science 3-8 and High School</b>			
<b>Student Group</b>	<b>Total Students Assessed</b>	<b>Total Assessed in Alternative Assessment</b>	<b>Percent Assessed in the Alternate Assessment</b>
<b>All Students</b>	514,407	7,248	1.41%
<b>Hispanic</b>	79,769	912	1.14%
<b>American Indian/Alaskan Native</b>	2,499	34	1.36%
<b>Asian</b>	14,442	217	1.50%

<b>Black</b>	120,453	2,476	2.06%
<b>Hawaiian/Pacific Islander</b>	1,397	19	1.36%
<b>White</b>	295,847	3,590	1.21%
<b>Two or More Races</b>	N/A	N/A	N/A
<b>Unknown Races</b>	0	0	0.00%
<b>Male</b>	263,849	4,903	1.86%
<b>Female</b>	250,558	2,345	0.94%
<b>Unknown Gender</b>	0	0	N/A
<b>English Learner</b>	339,722	314	0.09%
<b>Economically Disadvantaged</b>	158,835	2,936	1.85%

- B. The state has measured the achievement of at least 95 percent of all students and 95 percent of students in the children with disabilities subgroup enrolled in grades for which the assessment is required.

Tennessee aligns with the federal participation requirements for assessment and requires all students enrolled in public K-12 schools to participate in assessments with or without accommodations or with the alternative assessment. The only allowable exception to this participation requirement is to receive a medical exemption due to medical necessity.

Table 6: Participation Rates for ELA Assessment

<b>Participation for ELA Assessments – Grades 3 – 8; High School</b>
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	<b>All Students</b>	<b>Students with Disabilities</b>
Students Assessed	517,486	70,286
Students Enrolled	523,195	71,664
Assessment Participation Rate	98.91%	98.08%

Table 7: Participation Rates for Mathematics Assessment

<b>Participation for Mathematics Assessments – Grades 3 – 8; High School</b>		
	<b>All Students</b>	<b>Students with Disabilities</b>
Students Assessed	512,173	71,263
Students Enrolled	518,278	72,718
Assessment Participation Rate	98.82%	98.00%

Table 8: Participation Rates for Science Assessment

<b>Participation for Mathematics Assessments – Grades 3 – 8; High School</b>		
	<b>All Students</b>	<b>Students with Disabilities</b>
Students Assessed	514,407	70,044
Students Enrolled	520,831	71,974
Assessment Participation Rate	98.77%	97.32%

**Requirement 3** 34 C.F.R. § 200.6(c)(4)(iii): Provide assurances that LEAs with over 1.0 percent participation in the alternate assessments followed the state's participation guidelines. (A) Followed each State's guidelines; and (B) will address disproportionality in the percentage of students in any subgroup taking alternative assessments.

For the 2023-24 school year, all districts that contributed to the state exceeding one percent were sent a notice (Attachment 1) and required to complete a justification (Attachment 2). The LEAs were required to submit a justification for their participation rate exceeding 1 percent and assurances that the district would adhere to the state guidelines for participation. The notification letter was revised in fall 2022 to include demographic data (Attachment 1). Data was provided to each notified LEA. The data provided the state counts and rates and the LEA counts and rates in each of the following areas:

- longitudinal participation rates from the 2020-21 school year through 2023-24,
- disability of the participants,
- economic disadvantage status,
- English learner status,
- gender, and
- race/ethnicity.

The LEAs were asked to analyze the data for the justification. LEAs were asked to return the justifications by December 19, 2024. Each justification was reviewed by the Senior Manager of Professional Development and Low Incidence Disabilities. Any LEA practices that do not align with the criteria and guidance were addressed with the special education director. The LEAs either needed to revise their justification to clarify their response, add more information, and/or describe their plan to adjust LEA practices and fully align with state guidance. The final justifications were returned to the state for public posting.

Analysis of the LEA data and their justification related to significant disproportionality was used to identify LEAs that will receive intensive professional development. Specifically, the use of the LEA demographic data and participation rates of each subgroup universally participating at rates above the state rate in Tennessee: Black, male, and economically disadvantaged (Table 1). (Note: while the category of unknown gender appears in the data to be 100 percent, the state general assessment does not allow for this option, and therefore, the data is misleading.)

The department has expanded the APR data team to ensure oversight and support for LEAs as they implement the Individuals with Disabilities Education Act (IDEA). The team will focus on increasing LEAs' understanding of State and LEA Annual Performance Report (APR) data. The IDEA Support and Oversight team identifies statewide, regional, and LEA data trends and collaborates with the department's IDEA Data

team to communicate local determinations and required corrective actions, proactively monitor APR data and provide professional learning, guidance, and resources for LEAs through a tiered technical assistance plan.

**Requirement 4** 34 C.F.R. § 200.6(c)(4)(iv): Include a plan and a timeline by which

- A. The state will improve the implementation of its guidelines for participation, including if necessary, revising its definition of “students with the most significant cognitive disabilities” so that the state meets the cap in the future school years.

The state will continue to meet the comprehensive requirements for assessments noted in ESSA and implement regulations regarding all State-determined academic standards and assessments, including reporting student achievement and school performance, disaggregated by subgroups, to parents/families and other external stakeholders.

The department has consistently engaged school leads, educators, and other stakeholders in training and technical assistance using criterion guidance documents<sup>2</sup>, file reviews, and technical assistance resources. A component of the technical assistance provides additional in-depth guidance on the difference between a significant cognitive disability and *the most significant cognitive disability*. The department reviewed the criteria and determined they are appropriate; however, more training is needed in the field to adhere to them. Specifically, the technical assistance requires districts and IEP teams to consider the full body of data, including normative assessments, when determining the student’s eligibility. This requires the IEP team to engage in a full conversation.

In the 2024-25 school year, due to the ongoing issue of local and state education agencies exceeding the 1 participation rate, the state conducted a thorough analysis. Furthermore, the state completed federal monitoring in October 2024. The data analysis and federal monitoring findings resulted in two and main factors contributing to this problem. These factors will continue to be addressed in the following year to decrease participation in the AA-AAAS. The root causes identified were:

1. A need for increased LEA data literacy knowledge and skills.
2. A need to increase LEA staff understanding of “most significant cognitive disability” and applying the criteria to decision-making. (Please note, this root cause impacts alternate assessment eligibility

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<sup>2</sup> <https://www.tn.gov/education/assessment/alternate-assessment.html>  
[https://www.tn.gov/content/dam/tn/education/testing/alt/Criterion\\_1\\_Considerations.pdf](https://www.tn.gov/content/dam/tn/education/testing/alt/Criterion_1_Considerations.pdf)  
[https://www.tn.gov/content/dam/tn/education/testing/alt/Criterion\\_2\\_Considerations.pdf](https://www.tn.gov/content/dam/tn/education/testing/alt/Criterion_2_Considerations.pdf)  
[https://www.tn.gov/content/dam/tn/education/testing/alt/Criterion\\_3\\_Considerations.pdf](https://www.tn.gov/content/dam/tn/education/testing/alt/Criterion_3_Considerations.pdf)

determinations, but also LRE placements that may restrict or reduce a student’s access to the general education instruction. Both outcome measures will be used for analysis.).

The state plan and timeline will address the identified root causes that will reduce the percentage of students participating in the alternative assessment below the one percent rate. This plan includes state guideline clarification, universal professional learning opportunities, progress monitoring and data literacy, oversight, and targeted support for identified state and LEA trends and needs. Consistent with the plan in Table 5, the department will implement comprehensive system improvements and monitor alternative assessment administrations to avoid exceeding the one percent rate.

<b>Additional Information Informing and Impacting Plan of Action</b>	
Population Growth Analysis	<p>Analysis of growth indicates that the population of students with significant cognitive disabilities is complicated.</p> <ul style="list-style-type: none"> <li>- The state has a new school voucher program, which will impact the number of students participating in assessments and the number of students with disabilities participating in assessments. Few schools accepting the state voucher have a program that supports students with significant cognitive disabilities. Thus, the state alternate assessment participation rate may increase, despite maintaining or reducing the number of students tested on the AA-AAA.</li> <li>- Further refining state data processes will help address the challenge of determining which students should be included in the analysis is challenging. Students with significant cognitive disabilities fall under various eligibility categories, including intellectual disability, multiple disabilities, and autism. They may also be identified as having other health impairments, such as being blind, deaf-blind, visually impaired, speech and language impaired, having a developmental disability, traumatic brain injury, or orthopedic impairment.</li> <li>- The state's participation rate is well above one percent. Thus, the sample may be misleading and include students who do not meet the participation criteria as defined in the guidance.</li> </ul>

	<ul style="list-style-type: none"> <li>- Comparing the findings of APR Indicator 10 and the alternate assessment participation rates did not result in a clear correlation. It was hypothesized that districts that proportionately identify students as intellectually disabled or autistic would also have the highest rates of participation. However, this was not consistently true.</li> </ul> <p>The analysis results reveal the need for future work revising eligibility standards, codification, and alternate assessment guidance. The current eligibility standards in Tennessee are guidance-only documents. Codifying the standards into policy will clarify for districts the need to adhere to the standards. The department convened an assessment task force in 2023 to review the following eligibility standards: Emotionally Disturbed, Speech Language Disorder, Specific Learning Disability, Developmentally Delayed, and Autism. The task force recommendations were presented to the Governor's SWD (Students with Disabilities) Advisory Council. The State Board of Education has requested that we delay approving the proposed eligibility standards until the task force work for all 15 eligibility categories is completed. This is expected to be complete by June 2026</p>
<p>Alternative Assessment Design</p>	<p>The shift to the DLM is a crucial action toward reducing participation in the alternate assessment for several reasons.</p> <ul style="list-style-type: none"> <li>- The shift to a new assessment created interest and opportunities to engage with more stakeholders and reinforced the expectations for eligibility. Before the new assessment, many educators opted out of these trainings, believing they knew the content.</li> <li>- The DLM design more accurately reflects the unique needs for the target population of students. The DLM test questions are embedded in the instructional content. Students performing above the instructional level will be more apparent to the teachers, encouraging them to assign the student to the most appropriate general assessment. IEP case managers can advocate for the general assessment using their experience in the DLM.</li> <li>- The DLM scaffolding and data results are not just numbers, they are a powerful tool for identifying students who need additional support and those achieving above the target for alternate assessments. These results will assist the state, educators, and school leaders in identifying students who may no longer meet</li> </ul>

	<p>eligibility. The state will provide LEA Special education directors with a list of students whose performance on the DLM is at a level 5 with guidance documents for IEP to determine if the student no longer meets alternate assessment eligibility.</p> <ul style="list-style-type: none"> <li>- Guidance will continue to be developed to help district special education directors and IEP case managers determine when to reconvene an IEP team meeting to reconsider eligibility for the alternate assessments. Tools will be created to guide the conversation using student performance on the DLM. Other states within the DLM consortium have reduced their alternate assessment participation rate using the same method. Tennessee has spoken with these partners in the DLM meetings and NCEO 1% calls. The state will continue collaborating with states and technical assistance centers until the participation rate is below 1 percent.</li> </ul>
<p>Comprehensive Technical Assistance</p>	<p>Technical assistance has been one of the key actions in the Tennessee plan annually.</p> <ul style="list-style-type: none"> <li>- In the 2024-25 school year, the training focused on criterion three, the student's need for extensive, substantial, individualized support and services regardless of the student's least restrictive environment (LRE). This work aligns seamlessly with other work streams in the department, ensuring a comprehensive approach to increased LEA capacity to support students with disabilities within the general education environments and increased instructionally appropriate IEPs that lead to postsecondary readiness. Furthermore, LEAs have reported that their new understanding of criterion 3 has shifted their internal practices and decision-making. While LEAs are hesitant to move a middle or high school student to the general assessment, there is a decrease in the number for students eligible in grade 3.</li> <li>- The widespread staffing shortages, high turnover rates, and the increase in school administrators with less than three years of leadership experience are a few factors that must be considered in the planning and delivery of technical assistance. The state focused on ensuring the teachers in a self-contained setting had sufficient expertise in teaching grade-level standards, finding several districts noncompliant and requiring changes in staff or that the teacher participate in one of the state's Grow Your Own initiatives.</li> </ul>

	<ul style="list-style-type: none"> <li>- Ideally, technical assistance will continue to increase in depth and complexity, but sustaining the ongoing targeted professional learning with staff turnover is challenging.</li> <li>- Former technical assistance participants have identified three critical revisions to the technical assistance as the most impactful:             <ol style="list-style-type: none"> <li>1. analyzing LEA-specific participation data to identify local trends,</li> <li>2. focusing on criterion three, and</li> <li>3. using the normal curve to identify the one percent better regardless of eligibility category (e.g., intellectually disabled eligibility is not sufficient evidence).</li> </ol> </li> </ul>
<p>Resource Tools Aligned with IEP Development</p>	<p>One of the department's major work streams has been procuring and developing a new statewide data and monitoring system for students with disabilities and other unique learning needs: (English learners, students served with a Section 504 plan, and students receiving tiered interventions through RTI<sup>2</sup> for characteristics of dyslexia).</p> <p>One change made was developing a new alternate assessment decision-making worksheet. (Attachment 3). The prior worksheet focused only on criterion one, the student has a significant cognitive disability including an adaptive behavior delay. Previously, criteria two and three did not require evidence or justification.</p> <p>The new statewide system and the revised alternate assessment worksheet have increased educators' awareness and questions. States reported the same effect at the fall Council of Chief State School Officers alternate assessment team convening for all states that revised guidance documents. Reengaging with CCSSO was one of the department's efforts to reduce the alternate assessment participation rate.</p> <p>The department will revise alternate assessment guidance to support IEP team members in three ways: guidance on how to effectively document decisions within the new statewide IEP system, adding clarity on the three criteria, and leveraging the DLM data and instructional resources to inform decisions and move students from the alternate to the general</p>

	<p>assessments. The act of revising and releasing guidance has been shown across states to renew interest and focus. Tennessee plans to leverage this effect with the added resources and tools to effect change.</p>
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B. The state will take additional steps to support and provide appropriate oversight to each LEA that the state anticipates will assess more than 1% with the alternative assessment.

The state is continuing to consider ways to increase the capacity of the team supporting and providing oversight to LEAs regarding IDEA implementation, including IEP monitoring, results-based monitoring, LEA APR local determinations, data discussions, and targeted technical assistance. As mentioned previously, all LEAs with anticipated assessment rates exceeding 1% will complete a justification form and receive universal or targeted technical assistance from the departmental team.

The department restructured the Special Education and Student Support division to establish the IDEA Data and Oversight team specifically focused on professional development using a three-prong approach. The first prong is focused on increased access to information, guidance, and implementation tools. The second prong will be focused on using the information and guidance within the LEAs. This second prong is critical to address the staffing turnover rates. The third prong is an intensive investment in developing expertise and systemic change at a sustained level.

The state restructure also resulted in a team focused on supporting LEAs in using their data to impact APR, with an intensive focus on indicators 3, 5, and 6. The alternate assessment participation rate is one of the symptoms of districts' need for systemic change in the least restrictive environment (indicator 5) and student assessment performance (indicator 3). Embedding the alternate assessment within this work will add weight and urgency for district leadership and provide them with the tools to self-monitor.

The state is further linking the work from these two teams to ensure all LEAs receive consistent guidance and expectations.

The state also launched the Acceleration for All (A4A) initiative. A4A is focused on ensuring every student has access to grade level, tier I content and instruction regardless of their LRE. District leadership teams have engaged in this work since late fall 2024 and school leadership was added in March 2025. The A4A work will include strategies for engaging students with the most significant cognitive disabilities.

C. Any disproportionality in the percentage of students taking an alternative assessment aligned with alternate academic achievement standards.

Tennessee will continue to conduct data analysis to monitor and identify potential disproportionality among student groups. In the event disproportionality is identified a comprehensive plan will be deployed through

intensive technical assistance. Specifically, the steps below will be taken to address disproportionality concerns:

- Calculate and analyze participation rates among student groups to identify state, regional, or local trends.
- Identify student groups over-represented in participation in alternative assessment.
- Review LEA justification forms and supporting data.
- Conduct longitudinal reviews of data to identify trends over time.
- Continue to provide LEA support and technical assistance as determine needed.
- Engage internal and external stakeholders to solicit ways to improve communication and technical assistance.

Table 5 Reduce Alternate Assessment Participation Plan and Timeline

Timeframe	Tasks for 2025-24
May 2025	Public posting of 1% Waiver Request
May 2025 – June 2025	Public Comment Period (30 days) <ul style="list-style-type: none"> <li>- The state will inform stakeholders of public comment period through multiple methods including departmental newsletters, and direct correspondence to LEA leads, advisory councils, parent information centers, technical assistance partners.</li> <li>- The state will review all public comments following the 30-day public comment period to incorporate in the final waiver as appropriate.</li> </ul>
July 2025	Alternative Assessment Data Dive <ul style="list-style-type: none"> <li>- Analyze alternate assessment participation and student performance data to establish new LEA notification and flag LEAs based on DLM data within the new state data dashboard.</li> <li>- Develop tools for Special Education supervisors and school leaders to monitor alternate assessment eligibility and LRE.</li> </ul>
August 2025 – June 2026	Continue the internal 1% Alternative Assessment Steering Committee <ul style="list-style-type: none"> <li>- Convene a working group composed of cross-departmental members to meet monthly.</li> <li>- Review plan and public feedback.</li> <li>- Review LEA data to determine state, regional, and local trends.</li> <li>- Review Waiver plan and timeline to norm on contents, timelines, and cross-collaborative work of the department.</li> </ul>

	<ul style="list-style-type: none"> <li>- Develop sprint(s) to ensure a plan is executed.</li> <li>- Develop a data review and analysis timeline to monitor progress.</li> <li>- Monthly status updates and revision of plan as needed.</li> <li>- Communication plan developed, monitored, and executed.</li> <li>- Professional learning plan develop, monitored, and executed.</li> </ul>
August 2025-March 2026	<p>Professional Development and TA provided to LEAs identified for targeted and intensive support</p> <ul style="list-style-type: none"> <li>- Develop guidance to LEA leadership and special education teachers on the DLM instructional planning resources.</li> <li>- Develop professional development for educators using the DLM instructional resources, state standards, and high-quality instructional materials.</li> <li>- Engage multiple partners in the TN Technical Assistance Network (TN TAN) to create resources, tools, and partnerships with LEAs.</li> <li>- Develop professional learning opportunities and resources for parents/families on new eligibility guidance documents.</li> <li>- Provide guidance to LEA leadership and special educators on the DLM instructional planning resources.</li> </ul>
August 2025 - September 2025	<p>LEA Oversight Activities</p> <ul style="list-style-type: none"> <li>- LEAs with an alternate assessment participation rate are notified and required to submit a justification form.</li> <li>- LEA Alternative Assessment Justification forms are posted online.</li> <li>- Internal work to add LEA alternative assessment participation to the calculations for LEA determinations.</li> </ul>
September 2025	<p>Launch and communicate the Reduce 1% Alternative Assessment Plan</p> <ul style="list-style-type: none"> <li>- Low incidence disabilities spotlight in the Special Education Director newsletter</li> <li>- Special Education Director Monthly Call</li> <li>- District Testing Coordinator webinars</li> <li>- CORE (Centers of Regional Excellence) Special Education Consultants engage with regional study councils.</li> <li>- TNSTEP and The Arc of Tennessee (Parent/Family Engagement) resources and events</li> <li>- Governor's SWD Advisory Council</li> </ul>

	<ul style="list-style-type: none"> <li>- Other external stakeholders</li> <li>-</li> </ul>
September 2025 – June 30, 2026	<p>Implement and Support Reduce 1% Alternate Assessment Plan</p> <ul style="list-style-type: none"> <li>- Regular agenda item on the month Special Education Director Calls</li> <li>- Quarterly Collaborative Office Hours with Assessment and Special Education Program SME</li> <li>- Professional Development Opportunities</li> </ul>
September – December 2025	DLM Fall Administration Window
January 2026	<p>Data Step Back</p> <ul style="list-style-type: none"> <li>- The Internal Steering Committee will review multiple data sources including TN PULSE reports, DLM assessment data, administration implementation data, TN TAN referrals, technical assistance involvement/impact, etc.</li> <li>- Determine state, regional, and local trends to determine the need for additional resource/guidance creation or targeted supports for LEAs.</li> <li>- Solicit internal and external stakeholder feedback.</li> <li>- Adjust plan as needed</li> </ul>
February 2026 – May 2026	DLM Spring Administration Window
February 2026	<p>Communication and Continued Professional Learning/TA</p> <ul style="list-style-type: none"> <li>- Communicate fall administration window dates via Special Education Supervisor monthly call, department newsletters, relevant listserv, TN TAN partners, and CORE Special Education Consultants.</li> <li>- Continue to develop needed resources, guidance and supports for universal and targeted technical assistance.</li> </ul>
March 2026	<p>Data Step Back</p> <ul style="list-style-type: none"> <li>- Analyze third quarter data for progress toward reducing participation in alternate assessments.</li> <li>- Review data from professional learning opportunities, TN TAN supports, technical assistance plans and other sources to revise or add professional development and guidance to address needs to reduce alternate assessment participation below 1%.</li> </ul>

April 2026	<p>Review preliminary alternate assessment participation rate calculation to determine if a waiver will be needed.</p> <ul style="list-style-type: none"> <li>- Draft waiver if indicated.</li> </ul> <p>Request necessary data for completion of 1% waiver with a deadline of June 1.</p>
May 2026	<p>If applicable,</p> <ul style="list-style-type: none"> <li>- Post alternate assessment waiver (draft) for 90-day public posting.</li> <li>- Inform stakeholders of opportunity and solicit feedback during public comments period of 30 days.</li> </ul>
June 2026	<p>Year-end Review of implementation of Plan</p> <ul style="list-style-type: none"> <li>- Review updated data and public comments for final revision of 1% Alternative Assessment Waiver (if needed)</li> <li>- Convene steering committee for virtual or in person meeting to review implementation of Reduce 1% Alternative Assessment Plan</li> <li>- Revise and develop plan for 2026-27 SY</li> </ul>