

2025-26 Alternative Assessment Justification

Local Educational Agency (LEA) Justification and Assurances for Exceeding the 1.0 Percent Cap

Purpose

In accordance with the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), and 34 C.F.R. § 200.6(c), local educational agencies (LEAs) contributing to the state exceeding the 1.0 percent cap must submit a justification and assurances.

1. Select LEA Name and ID#

180 - Cumberland County

2. Enter the Last Name, First Name of the individual submitting this form.

Marlene Holton

3. Identify your role within the LEA. Special Education Director

- a. Special Education Director
- b. Special Education Coordinator
- c. Other

ELA Participation Rates for School Years 2020-21 through 2025-26

4. **ELA Participation Rates 2020-21** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA. **

1.16

5. **ELA Participation Rates 2021-22** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA. **

1.47

6. **ELA Participation Rates 2022-23** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA. **

1.51

7. **ELA Participation Rates 2023-24** *Note: Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA. **

1.68

8. **ELA Participation Rates 2024-25** *Note: Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA. **

1.58

9. **ELA Participation Rates 2025-26** **2025-26 is an estimated participation rate using LEA assessment provisioning data. **

1.96

Math Participation Rates for School Years 2020-21 through

10. **Math Participation Rates 2020-21** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA.* *

1.17

11. **Math Participation Rates 2021-22** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA.* *

1.47

12. **Math Participation Rates 2022-23** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA.* *

1.5

13. **Math Participation Rates 2023-24** *Note: Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA.* *

1.64

14. **Math Participation Rates 2024-25** *Note: Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA.* *

1.42

15. **Math Participation Rates 2025-26** **2025-26 is an estimated participation rate using LEA assessment provisioning data.* *

1.96

Science Participation Rates for School Years 2020-21 through 2025-26

16. Science Participation Rates 2020-21 *

1.24

17. Science Participation Rates 2021-22 *

1.47

18. Science Participation Rates 2022-23 *

1.43

19. Science Participation Rates 2023-24 *

1.64

20. Science Participation Rates 2024-25 *

1.88

21. Science Participation Rates 2025-26 *2025-26 is an estimated participation rate using LEA assessment provisioning data. *

1.89

Number of Students Scoring

To calculate: Log into KITE - Reports - Alternate Assessment Reports - Year 2025 - LEA Name and select the .PDF file. The first table in the report provides the number of students scoring Advanced by grade and subject. Calculate the total number of students scoring Advanced for each subject.

22. In school year 2024-25, list the total number of students scoring "Advanced" for **ELA**. *

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23. In school year 2024-25, list the total number of students scoring "Advanced" for **Math**.

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Process for Determining Alternate Assessment Eligibility:

Criterion One

In this section, describe the processes in place to ensure the IEP team is making informed, data-based decisions aligned to the alternate assessment participation criteria. Please note that completion of the Alternate Assessment Worksheet in TN PULSE alone is not sufficient evidence.

Criterion One: The student has a significant cognitive disability. Only students with the most significant cognitive disabilities should be considered for the alternate assessment.

You must also describe the process for reviewing alternate assessment eligibility for any student scoring Advanced in at least one subject. Advanced performance scores may indicate that the student's skills exceed the eligibility criteria and should prompt a review of the student's continued participation in the alternate assessment.

In the questions below, describe the process used to ensure the IEP team considers only students with the most significant cognitive disabilities (approximately 1.0 percent of the student population).

24. How are IEP teams informed of the criterion and expectations for determining if the student meets expectations for participation? *

The student has a significant cognitive disability. Only students with the most significant cognitive disabilities (1% of the student population) should be considered for participation in the alternate assessment. IAIEP Teams in Cumberland County Schools are informed of the criteria and expectations for alternate assessment participation through guidance provided by the Tennessee Department of Education. This guidance clearly outlines the eligibility requirements for participation in the alternate assessment. The IAIEP team follows a structured, data-based decision-making process to ensure that only students with the most significant cognitive disabilities are considered. The process begins with determining whether the student can participate in the general education assessment, with or without appropriate accommodations. Only after this determination is made does the team consider participation in alternate assessment. Decisions are individualized and based on comprehensive data collected across multiple sources, school years, and instructional settings. These data include cognitive assessments, adaptive behavior measures, academic performance, progress monitoring, and observations across environments. Importantly, eligibility is not based on exclusionary factors, such as excessive absences or social, cultural, or economic differences. The IAIEP team, including parents, engages in a deliberate and collaborative process to determine whether the student meets Criterion One. To qualify, the team must determine that the student demonstrates: The most significant cognitive processing deficits, The most significant adaptive behavior deficits compared to same-age peers across multiple settings, and This results in a need for intensive, individualized support to access and make progress in the curriculum. Students who meet this criterion typically require substantial modifications, specialized instruction, and supports, as well as ongoing instruction to acquire, maintain, and generalize skills. Cumberland County Schools also emphasizes family engagement and informed decision-making. The IAIEP team conducts backward planning with families to discuss diploma pathways and long-term implications of alternate assessment participation. This includes clear communication that participation may not lead to a regular high school diploma and may impact postsecondary and career opportunities. Resources provided to families include the Alternate Assessment Participation Guide, Diploma Decision Guide, Parent Guide, and information on Tennessee diploma options. The IAIEP team discusses and decides annually on participation in alternate assessment to ensure it continues to reflect the student's current needs and performance. To ensure consistency and

Process for Determining Alternate Assessment Eligibility:

Criterion One

compliance, all educators receive annual training on the Least Restrictive Environment (LRE) continuum and the federal 1% cap on alternate assessment participation. IAIEP teams utilize state tools, including the Tennessee Alternate Assessment Participation Decision Flowchart and the Determination of Eligibility for Alternate Assessment Participation form, to guide decisions. Cumberland County Schools has a clear process for reviewing students who score Advanced on alternate assessments. Advanced performance may indicate that a student's skills exceed the eligibility criteria for alternate assessment participation. When a student scores Advanced in one or more subject areas: The IAIEP team reconvenes to review eligibility. The team examines updated data, including academic performance, progress monitoring, cognitive and adaptive functioning, and grade-level expectations. The team determines whether the student continues to meet all three eligibility criteria. If the data suggest that the student no longer demonstrates the most significant cognitive disability, the team considers whether the student can participate in general education assessments with appropriate accommodations.

25. What data are used to make the determination (e.g., cognitive and adaptive behavior data)? *

Determinations regarding participation in the alternate assessment are individualized and based on comprehensive data collected across multiple sources, school years, and instructional settings. The IAIEP team uses a holistic, data-based decision-making process to ensure that eligibility accurately reflects the student's true educational needs. Importantly, decisions are not based on exclusionary factors such as excessive absences or social, cultural, or economic differences. Data used to inform this determination include, but are not limited to: Comprehensive psychoeducational evaluations, including cognitive and processing data Standardized cognitive assessments to evaluate intellectual functioning Academic achievement data (e.g., standardized assessments, classroom performance) Progress monitoring data across time (e.g., MTSS/RTI, intervention response) Adaptive behavior assessments measuring conceptual, social, and practical skills Teacher observations and behavior checklists across settings Parent/guardian input, including developmental and functional history Related service provider reports (e.g., speech-language, occupational therapy) Direct observations in instructional and natural environments Previous alternate assessment results Summative and formative assessments, including teacher-created measures In addition, the IAIEP team explicitly reviews exclusionary factors (e.g., limited instruction, excessive absences, or cultural and linguistic differences) to ensure that these are not the primary reasons that may affect the student's academic performance. The IAIEP team synthesizes all available data to determine whether the student demonstrates significant and persistent cognitive and adaptive functioning deficits that substantially impact daily functioning and educational performance. The team also evaluates the extent to which the student requires intensive, individualized instruction and substantial supports to access and make progress in the curriculum. This comprehensive, multi-source approach ensures that decisions are valid and aligned with best practices in data-based decision making and guidance from the Tennessee Department of Education.

26. How is adaptive behavior data incorporated into the decision-making process? *

Adaptive behavior data are a critical component of the decision-making process when determining eligibility for alternate assessment participation. These data are gathered through multiple sources, including standardized adaptive behavior assessments, teacher and parent input, and direct observations of the student's functioning across settings. The IAIEP team examines how the student performs in conceptual, social, and practical domains of adaptive functioning. This includes evaluating the student's level of independence in communication, self-care, social interaction, problem-solving, and daily living skills. Data is considered across multiple environments, including school, home, and community, to ensure an accurate and comprehensive understanding of the student's functional abilities. The team synthesizes this data to determine the extent and pervasiveness of adaptive skill deficits and how they impact the student's ability to access and make progress in the general education curriculum. Adaptive behavior data are not considered in isolation; rather, they are integrated with cognitive, academic, and observational data to establish whether the student demonstrates a pattern of significant cognitive and adaptive impairments consistent with criteria for alternate assessment participation. Ultimately, adaptive behavior data help the IAIEP team determine the level of support and intensity of instruction required, including whether the student needs substantial modifications and individualized support. This ensures that decisions are comprehensive, data-driven, and reflective of the student's real-world functioning.

Process for Determining Alternate Assessment Eligibility: Criterion Two

In this section, describe the processes in place to ensure the IEP team is making informed, data-based decisions aligned to the alternate assessment participation criteria. Please note that completion of the Alternate Assessment Worksheet in TN PULSE alone is not sufficient evidence.

Criterion Two: The student is learning content linked to (derived from) state content standards. All students, regardless of the assessment or the least restrictive environment (LRE) should receive standards-aligned instruction that is rigorous, meaningful, and sufficient in duration to increase student outcomes. Special education services are provided in addition to, not in place of, standards-based instruction.

In the questions below, describe the evidence used to ensure the student was provided access to grade-level, standards-aligned instruction. This should include an explanation of the process used to ensure the student received instruction aligned to grade-level standards at an appropriate level of rigor, intensity, and duration comparable to their peers.

27. How does the IEP team ensure the student's performance and skill level are due to a significant cognitive disability rather than an instructional disadvantage? *

The IAIEP team ensures that a student's performance and skill level are attributable to a significant cognitive disability, rather than an instructional disadvantage, by confirming that the student has had full access to high-quality, standards-based instruction and appropriate learning opportunities. To meet Criterion Two, the IAIEP team must determine that there is sufficient evidence demonstrating that: The student is learning content linked to (derived from) state academic standards. The student's disability significantly impacts their active participation in instruction aligned to grade-level standards. Instruction is intentionally designed to support active engagement and participation. Grade-level standards are appropriately broken down into smaller skills, steps, or units to support access and learning. The IAIEP clearly specifies where, when, and how the student will participate in standards-based instruction. Measurable annual goals and short-term objectives are aligned to grade-level standards and increase opportunities for learning. There is documented evidence of student progress toward IAIEP goals, objectives, and standards-based instruction. In addition, the IAIEP team reviews multiple indicators to ensure appropriate access to instruction and to rule out instructional disadvantage: Students participate in daily, standards-based instruction across content areas (ELA, Math, Science, Social Studies). Instruction includes significant supports, accommodations, and/or modifications to ensure engagement and access. Students require and receive scaffolds, supports, or modifications to build understanding and ask questions. Accommodations are embedded within instruction or specifically designed for individual access. There is evidence of a systematic approach to modifying instruction. Targeted instructional strategies are used to engage the student and elicit meaningful responses. Modifications remain directly aligned to grade-level standards. Planning reflects the belief that all students can make progress toward grade-level expectations. IAIEP Goal Alignment and Progress Monitoring IAIEP goals and objectives are standards-based and generalizable across subjects and settings. At least one goal addresses literacy development, and one goal addresses communication skills. There is formal and informal evidence of progress toward: Mastery of standards-based instruction, and IAIEP annual goals and short-term objectives. All students are provided instruction aligned with rigorous, grade-level standards and high expectations for success. This includes access to a standards-based curriculum, high-quality instructional materials, and effective teaching practices. Instruction is delivered with appropriate intensity, duration, and fidelity, comparable to peers, ensuring that the student has had a meaningful opportunity to learn. Before considering participation in the alternate assessment, the IAIEP team verifies that the student has received appropriate accommodations, specialized instruction, and evidence-based interventions. Data such as progress monitoring, Response to Intervention (RTI), instructional history, and attendance are reviewed to confirm that lack of progress is not due to insufficient instruction or limited opportunity to learn. The team evaluates whether the student's difficulties

Process for Determining Alternate Assessment Eligibility:

Criterion Two

In this section, describe the processes in place to ensure the IEP team is making informed, data-based decisions aligned to the alternate assessment participation criteria. Please note that completion of the Alternate Assessment Worksheet in TN PULSE alone is not sufficient evidence. persist despite consistent access to appropriate instruction and supports. If the student continues to demonstrate significant and pervasive deficits across cognitive and adaptive domains under these conditions, the team may determine that the student's performance is consistent with a significant cognitive disability. Cumberland County Schools (CCS) emphasizes that decisions regarding participation in alternate assessment are never based on instructional disadvantage. Instead, decisions reflect a careful, data-driven, and equitable process.

28. What data are used to make an informed determination? *

Determinations regarding participation in the alternate assessment are individualized and based on comprehensive data collected across multiple sources, school years, and instructional settings. The IAIEP team engages in a holistic, data-based decision-making process to ensure that eligibility accurately reflects the student's unique educational needs. Importantly, these decisions are not based on exclusionary factors such as excessive absences or social, cultural, or economic differences. Data used to inform this determination include, but are not limited to: Comprehensive psychoeducational evaluations, including cognitive and processing data; Standardized cognitive assessments to evaluate intellectual functioning; Academic achievement data (e.g., standardized assessments, classroom performance); Progress monitoring and benchmark data across time (e.g., MTSS/RTI, intervention response); Response to Intervention (RTI) documentation and intervention fidelity data; Adaptive behavior assessments measuring conceptual, social, and practical functioning; IEP progress reports and goal mastery data; State and district assessment results; Teacher observations and behavior checklists across settings; Attendance records to confirm adequate opportunity to learn; Parent/guardian input, including developmental and functional history; Related service provider reports (e.g., speech-language, occupational therapy); Direct observations in instructional and natural environments; Curriculum and instructional objectives; Student work samples; Present Levels of Academic and Functional Performance (PLAAFP); and IEP goals and short-term objectives. The IAIEP team synthesizes these data to determine whether the student demonstrates persistent and significant cognitive and adaptive deficits despite receiving appropriate instruction, accommodations, services, and interventions, as well as consistent access to the general education curriculum. Additionally, Criterion Two ensures that the student has had meaningful opportunities for active participation, including access to grade-level expectations, instruction within the least restrictive environment, opportunities to develop independence, and documented evidence of progress over time. This step is critical in confirming that the student's needs are not the result of an instructional disadvantage. Finally, the team evaluates whether the student requires extensive, direct, and individualized supports to make meaningful progress on content linked to grade-level standards. This comprehensive, multi-source review ensures that decisions are valid, defensible, and aligned with guidance from the Tennessee Department of Education and best practices in data-based decision making.

Process for Determining Alternate Assessment Eligibility: Criterion Three

In this section, describe the processes in place to ensure the IEP team is making informed, data-based decisions aligned to the alternate assessment participation criteria. Please note that completion of the Alternate Assessment Worksheet in TN PULSE alone is not sufficient evidence.

Criterion Three: The student requires extensive direct individualized instruction and substantial supports to achieve measurable gains in the grade- and age-appropriate curriculum.

In the questions below, describe the process used to determine that the student requires extensive, direct individualized instruction and substantial supports.

29. What data are used to support this determination? *

The student requires extensive, direct individualized instruction and substantial supports to achieve measurable gains in the grade- and age-appropriate curriculum. Determinations regarding participation in the alternate assessment are individualized and based on comprehensive data collected across multiple sources, school years, and instructional settings. The IAIEP team engages in a holistic, data-based decision-making process to ensure that eligibility accurately reflects the student's unique educational needs. Importantly, these decisions are not based on exclusionary factors, such as excessive absences or social, cultural, or economic differences. To meet Criterion Three, the IAIEP team must determine that the student requires extensive, direct, and individualized instruction, as well as substantial supports, to make progress in the grade- and age-appropriate curriculum. These supports are not temporary or transient; rather, they are intensive, ongoing, and necessary across multiple environments. Students who meet this criterion typically require: Substantially adapted materials Individualized methods of accessing information Instruction designed to support the ability to acquire, maintain, generalize, demonstrate, and transfer skills across settings The IAIEP team reviews and synthesizes multiple data sources, including but not limited to: Comprehensive psychoeducational evaluations, including cognitive and processing data Standardized cognitive assessments Academic achievement data (e.g., standardized assessments, classroom performance) Progress monitoring and benchmark data across time (e.g., MTSS/RTI, intervention response) Response to Intervention (RTI) documentation and fidelity data Adaptive behavior assessments measuring conceptual, social, and practical functioning IEP progress reports and goal mastery data State and district assessment results Teacher observations and behavior checklists Attendance records to confirm the opportunity to learn Parent/guardian input, including developmental and functional history Related service provider reports (e.g., speech-language, occupational therapy) Direct observations in instructional and natural environments Student work samples Formative and summative assessments, including teacher-created measures Present Levels of Academic and Functional Performance (PLAAFP). The IAIEP team uses this data to determine whether: The student demonstrates persistent and significant cognitive and adaptive deficits despite appropriate instruction and supports. The student requires extensive, repeated, and individualized accommodations, modifications, services, and supports. Supports are necessary across multiple settings and environments. Supports are essential for active participation and meaningful progress. The team also evaluates: Evidence that general education was considered first when determining the Least Restrictive Environment (LRE). Whether accommodations and modifications are: Individualized Subject-specific and setting-specific Effective in increasing participation and learning The IAIEP team ensures: Present levels include sufficient data to guide instructional planning. Student strengths are identified and used to inform supports and interventions. There is evidence of ongoing adjustments to supports as the student develops new skills. The impact of support has been verified through data. The student actively uses accommodations and supports during instruction. The IAIEP team evaluates whether the student requires extensive, direct, and individualized supports to make meaningful progress on grade-level content standards. If so and all criteria are met, the student may be appropriately identified for participation in alternate assessment. This comprehensive, multi-source review ensures that decisions are valid and aligned with guidance from the Tennessee Department of Education and best practices in data-based decision making.

30. How do IEP teams determine the type and level of supports needed, including for students whose least restrictive environment (LRE) is a highly modified special education setting for all or part of the day? *

IAIEP teams determine the type and level of support needed through an individualized, data-based decision-making process grounded in comprehensive information collected across multiple sources, school years, and instructional settings. These decisions are based on the student's unique educational needs and are not influenced by exclusionary factors such as excessive absences or social, cultural, or economic differences. During the annual IAIEP meeting, the team determines the student's least restrictive environment (LRE) by considering the full continuum of placement options, beginning with the general education setting. The team first evaluates whether the student can be successfully educated in general education with appropriate supports before considering more restrictive environments. For students who require a highly modified

Process for Determining Alternate Assessment Eligibility:

Criterion Three

In this section, describe the processes in place to ensure the IEP team is making informed, data-based decisions aligned to the alternate assessment participation criteria. Please note that completion of the Alternate Assessment Worksheet in TN PULSE alone is not sufficient evidence.

special education setting for all or part of the day, the IAIEP team determines that the student needs substantial adaptations to content, materials, and instruction. These students typically require individualized methods to access information and to acquire, maintain, generalize, and demonstrate skills across multiple environments. The IAIEP team carefully evaluates the intensity, frequency, and duration of support required, including: The level of adult assistance needed (e.g., prompting, direct instruction, supervision) The need for extensive, repeated, and individualized instruction The degree to which supports must be implemented across multiple settings Based on this analysis, the IAIEP team identifies the specific supports necessary for meaningful participation in instruction aligned with grade-level standards. These supports may include: Accommodations and modifications Related services (e.g., speech-language, occupational therapy) Assistive technology Behavioral supports and intervention plans Communication supports Specialized instructional strategies The team also determines whether the student requires ongoing, intensive instruction to learn, practice, maintain, and generalize skills, and whether these supports must be substantially adapted beyond what is typically available in the general education environment. Importantly, placement decisions are always individualized and based on documented student needs, not on the setting itself. This ensures that the student is provided access to the least restrictive environment while still receiving the level of support necessary to make meaningful educational progress, in alignment with guidance from the Tennessee Department of Education and best practices in special education.

31. How does the IEP team distinguish between supports required due to the student's disability and supports that are available as part of the instructional environment? *

The IAIEP team distinguishes between supports required due to the student's disability and those typically available within the instructional environment through a comprehensive, data-based review of the student's performance across settings and over time. The team examines documentation related to the student's: Response to instruction and intervention Level of independence in completing tasks Need for prompting and adult support Rate of skill acquisition and retention Ability to generalize skills across environments Using these data, the IAIEP team identifies which supports are necessary as a direct result of the student's disability, rather than those commonly available in the general education setting. Disability-related supports often include: Extensive, individualized instruction and repeated practice One-to-one or small-group instruction beyond typical classroom differentiation Assistive technology and adaptive materials Behavioral supports and intervention plans Specialized communication systems (e.g., AAC, PECS) Increased adult assistance (e.g., prompting, supervision, direct support) The team compares these needs to the universal and supplemental supports typically available within the instructional environment (e.g., Tier I and Tier II supports). If the student requires supports that are substantially more intensive, individualized, and sustained than what is generally provided, this indicates that the student's disability drives the need. Importantly, the IAIEP team ensures that decisions are not based solely on educational placement, disability category, or the availability of supports within a specific setting. Instead, eligibility and support determinations are grounded in individualized student data demonstrating the need for substantial, ongoing supports directly related to the student's significant cognitive disability. This distinction ensures that decisions are valid, equitable, and aligned with best practices in data-based decision making and guidance from the Tennessee Department of Education.

Disproportionality

Using data by primary eligibility (disability) category and demographic groups, describe LEA patterns of participation in the alternate assessment, including any disproportionate participation and a plan for reducing or eliminating disproportionality. Include a description of the LEA population demographics as compared to statewide demographics.

32. Describe any identified disproportionality in alternate assessment participation and the LEA's plan to address and reduce disproportionate participation, as applicable.

Based on a comprehensive review of district data, there is no evidence of disproportionality in participation in the alternate assessment within Cumberland County Schools (CCS). The distribution of students participating in the alternate assessment is consistent with both district demographics and state-level trends. In Cumberland County, approximately 75% of students participating in the alternate assessment have primary disability classifications of Intellectual Disability (ID) and Autism (AUT). This aligns closely with state data, where approximately 82% of students participating in the alternate assessment have primary disabilities of ID and Autism. These patterns are expected, as alternate assessments are designed for students with the most significant cognitive disabilities. Additional demographic data further support the absence of disproportionality: Approximately 70% of students participating in the alternate assessment are identified as economically disadvantaged, mirroring the district's overall population. Approximately 98% of students are non-English learners, consistent with the district's English learner population. Approximately 67% of students are male, and 34% are female, which does not indicate a disproportionate trend beyond what is commonly observed in special education populations. Approximately 94% of students are White, which aligns with the overall demographic composition of Cumberland County Schools. Additionally, there is no evidence of disproportionality based on race or ethnicity, as participation rates closely mirror the district's demographic makeup. These data indicate that decisions about participation in alternate assessment are equitable and not influenced by cultural, linguistic, or socioeconomic factors. Participation decisions are made on an individualized basis by the IAIEP team. The team determines whether each student meets all required eligibility criteria, including the presence of a significant cognitive disability, using structured tools such as the Tennessee Alternate Assessment Participation Decision Flowchart and the Determination of Eligibility for Alternate Assessment Participation form provided by the Tennessee Department of Education. Because no disproportionality has been identified, a formal corrective action plan is not required at this time. However, Cumberland County Schools remains committed to ongoing monitoring and continuous improvement. The district ensures continued equity by: Conducting annual reviews of alternate assessment participation data. Providing ongoing staff training on eligibility criteria and the federal 1% participation cap. Ensuring consistent implementation of data-based decision-making practices. Promoting family engagement and transparency in the eligibility process. Overall, this data supports that alternate assessment decisions in Cumberland County Schools are data-driven, equitable, and aligned with state guidance, ensuring that only students with the most significant cognitive disabilities are appropriately identified for participation.

*(For example, if the LEA student population is evenly distributed among White, Black, and Hispanic students, the alternate assessment participation data should reflect a similar distribution across those groups.) **

Informed Parent Participation

Students who participate in alternate assessments are significantly less likely to earn a traditional diploma due to the highly modified content and potential for lower expectations.

In the questions below, describe the processes and practices used to ensure parents are fully informed of the eligibility requirements and implications of alternate assessment participation.

33. How are parents informed of the eligibility criteria and implications of participation? *

Cumberland County Schools emphasizes family engagement and informed decision-making throughout the alternate assessment eligibility process. Parents are informed of eligibility criteria and the implications of participation through both the IAIEP meeting process and supporting written documentation. During IAIEP meetings, the team reviews the eligibility criteria established by the Tennessee Department of Education. Clearly, it explains that the alternate assessment is intended only for students with the most significant cognitive disabilities. The team provides a comprehensive explanation of the instructional and academic implications, including that the student will receive instruction aligned to alternate academic achievement standards linked to grade-level standards. A key component of this process is backward planning with families, during which the IAIEP team discusses diploma pathways and long-term outcomes. Parents are informed that participation in the alternate assessment is unlikely to lead to a regular high school diploma and may impact participation in secondary education and career opportunities. The team explains the differences among diploma options and how state-established assessment pathways may influence future decision-making, including resources such as the Alternate Assessment Participation Guide, Diploma Decision Guide, Parent Guide, and the Tennessee Diploma and Postsecondary Education Options handout, along with access to low-incidence resources. These materials ensure that families have a clear understanding of both the eligibility criteria and the long-term implications of participation. Decisions regarding alternate assessment participation are made annually by the IAIEP team to ensure that they reflect the student's current performance, progress, and needs. Each determination is based on a comprehensive, holistic review of student data, and the team verifies that the student meets all three required eligibility criteria. The Tennessee Alternate Assessment and the Department Opportunities, termination of Eligibility for Alternate Assessment Participation form, are used to guide this process. Overall, IAIEP Teams ensure that each decision is intentional, data-driven, equitable, and aligned with state guidance, while maintaining transparency with families and supporting each student's opportunity to reach their full potential.

34. How are parents included in the IEP team decision-making process? *

Parents are active and valued members of the IAIEP team and are included throughout the decision-making process. Cumberland County Schools prioritizes family engagement and collaboration to ensure that all decisions reflect the best interests of the student. The IAIEP team ensures parent participation by: Providing advance notice of meetings (at least 10 days) Scheduling meetings at a mutually agreed-upon time Sharing the purpose of the meeting in advance to support preparation During IAIEP meetings, parents are encouraged to actively contribute by sharing information about their child's: Strenuous and needed functioning and communication skills Performance across home, school, and community settings Concerns and priorities for their child's education and future The IAIEP team reviews all relevant data and evaluation results with parents. It engages in a collaborative discussion to determine which pathway a student meets eligibility criteria, including participation in the alternate assessment. Parents are also fully informed of the eligibility criteria and implications of participation, as established by the Tennessee Department of Education. The team clearly explains that the alternate assessment is intended only for students with the most significant cognitive disabilities and discusses the instructional implications, including alignment to alternate academic achievement standards. A key component of parent inclusion is backward planning, during which the IAIEP team works with families to discuss diploma pathways and long-term outcomes. Parents are informed that participation in the alternate assessment is unlikely to lead to a regular high school diploma and may impact postsecondary education and career opportunities. Differences among diploma options are clearly explained to support informed decision-making. To further support parents, the district provides resources such as the Alternate Assessment Participation Guide, Diploma Decision Guide, Parent Guide, and the Tennessee Diploma and Postsecondary Education Options handout, along with access to additional state resources. Decisions regarding alternate assessment participation are made annually, ensuring that determinations reflect the student's current performance, progress, and needs. Each decision is based on a comprehensive, holistic review of student data, and parents are included in verifying whether the student meets all three eligibility criteria. Overall, Cumberland County Schools ensures that parents are meaningfully involved, well-informed, and actively engaged in the decision-making process. This collaborative approach supports transparent, equitable, and data-driven decisions while maintaining high expectations and promoting the best possible outcomes for each student.

35. Participation in the alternate assessment must be reviewed at least annually. Students may transition to the general assessments at any time, as determined by the IEP team.

What processes are in place to ensure these decisions are fully discussed and reviewed at least annually? *Cumberland County Schools has established clear processes to ensure that decisions on alternate assessment participation are fully discussed and reviewed annually through the IAIEP process. The primary mechanism for review is the annual IAIEP meeting, during which the team conducts a comprehensive review of the student's current performance, progress, and needs. During this meeting, the IAIEP team:

- Reviews updated evaluation data, including cognitive, academic, and adaptive functioning
- Analyzes progress monitoring data, IEP goal progress, and assessment results
- Examines the student's response to instruction and interventions
- Confirms continued access to standards-based instruction and appropriate supports

Using this updated data, the IAIEP team determines whether the student continues to meet all three eligibility criteria for alternate assessment. To ensure consistency and fidelity of the review process, IAIEP teams utilize structured tools provided by the Tennessee Department of Education, including:

- The Tennessee Alternate Assessment Participation Decision Flowchart
- The Determination of Eligibility for Alternate Assessment Participation form

These tools inform teams in reviewing each criterion. In addition to the annual IAIEP meeting, Cumberland County Schools supports ongoing review through:

- Continuous progress monitoring of student performance and IEP goals
- Periodic data reviews throughout the school year to evaluate instructional effectiveness
- Annual staff training on alternate assessment criteria, the Least Restrictive Environment (LRE), and the federal 1% participation cap

If new data indicate a significant change in the student's performance (e.g., improved skills, increased independence, or advanced assessment performance), the IAIEP team may reconvene prior to the annual meeting to reassess eligibility and ensure appropriate participation. Parents are actively involved in all review processes, ensuring that decisions are transparent, collaborative, and well-informed. Overall, these processes ensure that alternate assessment participation decisions are intentional, data-driven, consistently reviewed, and reflective of the student's current needs, maintaining alignment with state guidance and best practices.

Ensuring Students Are Making Academic Progress

In *Endrew F. v. Douglas County School District*, the U.S. Supreme Court clarified that an IEP must be "reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances." Additionally, the U.S. Department of Education denied the state's 2024-25 waiver request, noting that it did "not find that approving the waiver will advance student academic achievement, as required in section 8401(b)(1)(C) of the Elementary and Secondary Education Act (ESEA)."

Thus, LEAs that contribute to the state exceeding the 1.0 percent cap must provide assurances that students participating in alternate assessments are provided access to and engagement in standards-based instruction and are making appropriate academic progress.

36. Describe the policies, procedures, and practices used in your LEA to ensure students are provided instruction that meets the requirements set forth by ESEA and *Endrew F.*, and that students make appropriate academic progress.*

Cumberland County Schools (CCS) has established comprehensive policies, procedures, and practices to ensure that all students, including those participating in alternate assessments receive standards-based instruction and make appropriate academic progress in alignment with the requirements set forth by the *Endrew F. v. Douglas County School District* and the Elementary and Secondary Education Act. All students, regardless of placement or assessment participation, are provided access to grade-level, standards-aligned instruction. For students participating in alternate assessments, instruction is aligned with alternate academic achievement standards linked to grade-level expectations. Special education services are provided in addition to, not in place of, core instruction. Instructional practices ensure: Use of high-quality, standards-based curriculum and materials Instruction delivered with appropriate intensity, duration, and fidelity Implementation of evidence-based instructional strategies Access to accommodations, modifications, and assistive technology to support engagement and learning The IAIEP team develops IEPs that are reasonably calculated to enable progress appropriate in light of the student's circumstances, consistent with *Endrew F* and includes: Development of measurable annual goals aligned to grade-level standards Inclusion of short-term objectives for students with significant cognitive disabilities Consideration of the student's present levels of academic and functional performance (PLAAFP) Alignment of goals, services, and supports to ensure meaningful educational benefit CCS ensures ongoing monitoring of student progress through: Frequent progress monitoring aligned to IEP goals and standards-based instruction Use of formative and summative assessment data, including alternate assessment results Review of benchmark data, work samples, and observational data Documentation of student growth over time The IAIEP team reviews this data regularly to determine whether the student is making appropriate progress and adjusts instruction, supports, and services as needed. Students receive targeted support through: Data-driven instructional adjustments Implementation of evidence-based interventions with fidelity This ensures that lack of progress is not due to insufficient instruction or lack of opportunity. Through the annual IAIEP process, the team: Reviews student progress and achievement data Evaluates the effectiveness of instruction and supports Ensures continued alignment with standards-based expectations Revises IEP goals and services to promote ongoing progress If data indicate limited progress, the team reconvenes to make timely adjustments to ensure the IEP remains appropriately ambitious. CCS provides ongoing professional development to ensure staff: Understand the requirements of *Endrew F.* and ESEA Implement standards-based instruction and IEP development practices Maintain alignment with the 1% alternate assessment participation cap District-level monitoring and support ensure consistency and fidelity across schools. Cumberland County Schools ensures that all students participating in alternate assessments: Have access to rigorous, meaningful instruction Are provided with appropriate supports and services Demonstrate measurable academic progress Through these policies and practices, CCS ensures that IEPs are not merely compliant but are appropriately ambitious and designed to enable each student to make meaningful progress, fully aligning with federal expectations and best practices.

Support Requested

37. Please describe any support needed from the department to assist in meeting the requirements outlined in this form. All reasonable

requests will be considered. * Cumberland County Schools is not requesting additional support from the department at this time. The district has conducted a comprehensive review of its data and is confident that IAIEP teams are making individualized, data-driven decisions that align with state guidance and best practices for alternate assessment participation. However, to further strengthen consistency and ensure continued alignment across districts, Cumberland County Schools would welcome additional clarification regarding statewide expectations for alternate assessment participation. Specifically, guidance that further defines consistent application of eligibility criteria across the state would support ongoing efforts to ensure equitable and accurate decision-making for all students.