

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#

190 - Davidson County (MNPS)

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

Cook, Adrienne

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

- 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. **

1.4

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. **

1.46

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. **

1.76

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

1.75

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

1.48

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

1.58

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.* *

1.39

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.* *

1.78

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

1.8

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

1.31

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

1.41

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

16. Science Participation Rates 2020-21 *

1.23

17. Science Participation Rates 2021-22 *

1.51

18. Science Participation Rates 2022-23 *

1.65

19. Science Participation Rates 2023-24 *

1.69

20. Science Participation Rates 2024-25 *

1.7

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

1.79

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**. *

115

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

63

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? *

All IEP team members - including special education teachers, school psychologists, and test coordinators - are provided professional development specifically addressing alternate assessment eligibility criteria. MNPS Department of Exceptional Education maintains a standardized, narrated presentation explaining the alternate assessment, participation guidelines, and the three eligibility criteria, which is available to all IEP team members via the MNPS SharePoint site. Coaches and school psychologists actively participate in IEP team meetings when alternate assessment placement is under consideration. The department offers office hours twice per week where school teams can ask questions about students being considered for alternate assessment. Teams are strongly encouraged to utilize the Alternate Assessment File Review Rubric in conjunction with Tennessee Department of Education Criterion 1 Considerations. School psychologists are required to case-consult with lead school psychologists when students are being considered for the alternate assessment for the first time. Teams are also directed to state-provided documents and videos to support informed decision-making consistent with the 1.0 percent threshold.

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

The data used to determine eligibility for Criterion 1 includes, but is not limited to, the student's full cognitive evaluation results (IQ scores and associated subscale performance) and adaptive behavior assessments. IEP teams are required to ensure that all evaluation procedures have been completed to confirm the presence of a significant cognitive disability. Teams are guided to address key questions: whether any factors may have affected cognitive assessment performance; the severity of the cognitive disability; and whether the adaptive behavior assessment addressed all three domains - conceptual, practical, and social. Psychological evaluations, IEP goal progress monitoring data, benchmark results, attendance data, behavioral data, and work samples may also be considered. If no recent evaluation is on file, schools are encouraged to conduct a new comprehensive psychological evaluation before determining alternate assessment eligibility.

Process for Determining Alternate Assessment Eligibility:

Criterion One

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

Adaptive behavior data is a required component of the eligibility determination for Criterion 1 and must reflect assessment of all three domains: conceptual, practical, and social. IEP teams review formal adaptive behavior scales (e.g., Vineland Adaptive Behavior Scales, Adaptive Behavior Assessment System) as part of the full evaluation record. Teams are expected to determine whether the adaptive behavior assessment comprehensively measured the student's functioning across all domains and whether the results are consistent with the presence of a significant cognitive disability. The MNPS Department of Exceptional Education coaches and school psychologists support teams in interpreting adaptive behavior data and applying it to eligibility decisions. Case consultation with lead school psychologists is required when results are ambiguous or when teams are making a first-time eligibility determination.

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? *

MNPS ensures that all students, regardless of assessment track, have access to rigorous, standards-aligned instruction. Student services and supports are organized to reflect the least restrictive environment, with placement decisions beginning in the general education setting. IEP teams are expected to consider whether the student has received sufficient standards-aligned instruction at an appropriate level of rigor, intensity, and duration comparable to their non-disabled peers before determining that their skill level reflects a significant cognitive disability rather than an instructional gap. Teams review the accommodations and instructional strategies used during core content instruction, assess whether modifications are directly aligned with grade-level standards, and consider the student's response to intervention data. Teams are guided by Tennessee Department of Education Criterion 2 Considerations to ensure that eligibility decisions are grounded in evidence of the student's actual disability profile rather than instructional history.

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

Data used to inform Criterion 2 determinations include: prior academic performance and progress monitoring data on IEP goals; evidence of access to the general education curriculum and core content standards; accommodation histories; records of supplemental supports and interventions; response to evidence-based instructional strategies; benchmark assessments; and teacher observations and work samples. Once the IEP team determines that a student will participate in the alternate assessment, MNPS implements Unique Learning Systems, a standards-aligned modified curriculum. All teachers instructing students on alternate assessment have access to a district resource that includes core content connectors, alternate academic diploma requirements, and recorded trainings on how to implement the modified curriculum. These records provide evidence that skill-level differences reflect the student's disability, not insufficient instruction.

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 determination that a student requires extensive direct individualized instruction and substantial supports is based on a comprehensive review of multiple data sources. These include: full psychological and evaluation records; IEP goal progress monitoring data; state assessment and benchmark results; attendance data; behavioral data; work samples; and results from adaptive behavior assessments. Teams consider whether there are significant medical, behavioral, academic, or adaptive needs that require individualized and sustained direct instruction and substantial supports beyond what the general education environment provides.

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? *

MNPS offers a full continuum of services and uses data to determine each student's individualized least restrictive environment. For students placed in highly modified special education settings for all or part of the day, IEP teams review placement decisions against student data including IEP goal progress, psychological evaluations, behavioral data, benchmark performance, and state testing results. LRE percentages for students not accessing general education for 80% or more of the school day are reviewed systematically to ensure placements are individually justified. The MNPS data-based eligibility protocol ensures that intensive supports, including special day school services and ancillary attendants, are warranted by the student's documented needs rather than the convenience of an available setting. Teams also consult the Tennessee Department of Education Criterion 3 Considerations and the state-provided "Guidance for IEP Teams on Participation Decisions for Alternate Assessment" document.

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? *

IEP teams distinguish between disability-specific supports and environmentally available supports through structured team discussion guided by the MNPS Alternate Assessment File Review Rubric and TDOE Criterion 3 Considerations. Teams consider whether the supports the student receives would be necessary regardless of the educational setting, or whether they are features of the existing classroom environment that any student in that setting could access. The data-based protocol used by MNPS requires teams to document whether accommodations and supports are directly tied to the student's identified disability-related needs and whether those needs persist across environments. MNPS coaches and school psychologists support IEP teams in making these distinctions during consultation and team meetings, particularly for students in more restrictive placements.

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.

In reviewing 2024–25 disproportionality data, MNPS has identified notable differences in alternate assessment participation across several demographic groups compared to the state. MNPS's alternate assessment population is 49.76% Black or African American students (state: 34.62%), and 22.68% Hispanic students (state: 12.37%), while White students represent 24.15% of alternate assessment participants compared to 49.30% statewide. These patterns reflect the overall demographic composition of MNPS, which serves a significantly more racially and ethnically diverse population than many other LEAs in Tennessee. Risk ratios for Black (approximately 1.48) and Hispanic (approximately 1.80) students are below the 2.0 threshold typically considered indicative of significant disproportionality. The most significant area of disproportionality is English Learner (EL) status: 20.00% of MNPS alternate assessment participants are English Learners compared to 3.91% statewide, yielding a risk ratio of approximately 4.74. This is partially attributable to the fact that approximately 25% of the overall MNPS student population are active English Learners, a proportion significantly higher than most other LEAs in the state. To address these patterns, MNPS will: (1) continue close monitoring of EL students participating in alternate assessment to ensure that English language acquisition needs are not being conflated with significant cognitive disability; (2) engage in further analysis of risk ratios for Black and Hispanic students and implement targeted IEP team supports if underlying systemic factors are identified; (3) continue to examine patterns of White student underrepresentation and assess whether demographic shifts or other factors are contributing; (4) provide ongoing professional development to IEP teams on distinguishing disability-related needs from linguistic and cultural factors in eligibility determinations; and (5) the English Language dept. and Exceptional Education dept. are building out a cross-collaborative 3-session professional development for EE and EL coaches reviewing key procedures and processes including an in-depth review of Alt. Eligibility for students. Discussion will also include a conversation around the percentage of students who are EL on alt. assessment and to examine root causes.

*(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? *

Before making any placement decision that would move a student onto an alternate academic diploma track, the IEP team meets with the family to review current evaluation data and discuss the student's ability to access and participate in the General Education Core Content Standards, including existing accommodations and any modifications being provided. Parents are informed that participation in the alternate assessment is associated with an alternate academic diploma pathway, which may limit post-secondary options and is significantly less likely to result in a traditional diploma. If no recent evaluation is on file, schools are encouraged to conduct a new comprehensive psychological evaluation so that current cognitive and adaptive behavior data can inform the team's discussion with the family. MNPS communicates the eligibility criteria and implications in a manner accessible to parents, including providing relevant documentation in the family's preferred language where applicable.

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

Parents are required members of the IEP team and are included in all discussions related to alternate assessment eligibility. The IEP team meeting to consider alternate assessment participation provides a structured forum for parents to review data, ask questions, and give meaningful input into the decision. MNPS IEP teams ensure that parents have access to evaluation data, progress monitoring information, and any other relevant documentation both before and during the meeting. MNPS EE coaches and school psychologists support schools in facilitating these conversations and ensuring that parent perspectives are authentically incorporated into eligibility decisions. No decision to place a student on alternate assessment is made without the informed participation of the parent or guardian as part of the IEP team process.

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? *Alternate assessment eligibility is reviewed at every annual IEP meeting as a required agenda item. During the annual review, IEP teams revisit current evaluation data, progress monitoring results, and assessment performance, including alternate assessment scores, to determine whether continued alternate assessment participation is appropriate. Teams specifically review students who scored at the Advanced level, as strong performance may indicate readiness to transition to general assessments. MNPS department coaches and school psychologists are available to support annual reviews, particularly for students whose continued eligibility may be in question. If new data suggest that a student could benefit from transitioning to general assessments, that decision can be made at any point in the school year, not only during the annual IEP review. Parents are informed at each annual review that the decision to participate in the alternate assessment is not permanent and may be revisited at any time.

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.* MNPS is committed to ensuring that all students participating in alternate assessments receive standards-aligned instruction that is rigorous, meaningful, and sufficient in duration to support academic progress consistent with the requirements of ESEA and the *Endrew F.* standard. All students, regardless of their assessment pathway, have access to a curriculum grounded in Tennessee state academic standards. MNPS uses Unique Learning Systems as the standards-aligned modified curriculum for students on alternate assessment, which is designed to provide access to grade-level content at an appropriate level of support. All teachers instructing students on alternate assessment have access to a digital resource within the district Learning Management System that includes core content connectors, alternate academic diploma requirements, and instructional trainings for teacher skill development. IEP goals for students on alternate assessment are developed to be ambitious yet achievable in light of each student's individual circumstances, consistent with the *Endrew F.* standard. Progress toward IEP goals is monitored regularly and reported to parents. MNPS coaches provide ongoing professional learning and support to ensure that instruction is standards-based and that IEP teams are developing goals that promote meaningful academic growth. Students whose alternate assessment scores indicate advanced performance are prioritized for eligibility review to determine whether more rigorous general assessment participation may be warranted.

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. *

MNPS requests continued support in the following areas: (1) Clarification on how DLM assessment scores are calculated, reported, and applied to TVAAS accountability measures, so that MNPS can relay accurate and current information to school staff and IEP teams. (2) Guidance and professional development resources specifically addressing the intersection of English Learner status and alternate assessment eligibility, to support IEP teams in distinguishing between English language acquisition needs and significant cognitive disability. (3) Targeted technical assistance and resources to support IEP teams in reviewing students who score at the Advanced level on the DLM to determine whether continued alternate assessment participation is appropriate. (4) Access to updated guidance documents, training webinars, or regional professional learning opportunities related to reducing alternate assessment participation while maintaining appropriate, data-based eligibility decisions. MNPS welcomes collaboration with the department to develop a plan for reducing participation rates over the next school year while ensuring all students are assessed appropriately.