

## 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#

271 - Humboldt City Schools

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

Cannon, Beverly

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.* \*

2.04

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.* \*

2.2

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.* \*

1.78

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

1.57

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

4.05

## 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.* \*

1.82

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.* \*

2.15

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.* \*

1.56

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

1.76

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

1.45

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

3.69

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

### 16. Science Participation Rates 2020-21 \*

0.93

### 17. Science Participation Rates 2021-22 \*

2.26

### 18. Science Participation Rates 2022-23 \*

1.52

### 19. Science Participation Rates 2023-24 \*

1.57

### 20. Science Participation Rates 2024-25 \*

1.78

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

0

## 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**. \*

0

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

0

## 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 IEP Teams are informed of the criteria and expectations for determining student participation through state and district led guidance, ongoing training, and structured IEP procedures. The participation criteria provided by the Tennessee Department of Education provides, including guidance and decision-making tools, that are shared with teams through professional development and accessible resources. During IEP meetings, teams use these tools to guide discussions and ensure decisions are based on established criteria. Expectations are reinforced through district support, consistent procedures, and documentation requirements within the IEP.

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

IEP teams use multiple sources of student data to determine participation, ensuring decisions are individualized and aligned to state criteria. These data include cognitive assessment results (ex: IQ or other standardized measures), adaptive behavior assessments (ex: communication, social, and daily living skills), and academic achievement data. Teams also consider classroom performance, progress monitoring data, teacher observations, and input from parents and related service providers. Additional information, such as the students' need for extensive supports and the impact of the disability on grade-level learning expectations, is reviewed. Using these comprehensive data sources ensures participation decisions are data-driven, and well-documented.

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

Adaptive behavior data are integrated into the IEP team's decision-making process by providing critical information about the student's functional skills across settings, including communication, social interaction, and daily living skills. Teams review results from standardized adaptive behavior assessments alongside other data to determine the level of independence and the extent of support the student requires. This information helps the team evaluate whether the student demonstrates significant limitations that impact participation in grade-level instruction. Adaptive behavior data are considered in combination with cognitive, academic, and classroom performance data.

**Process for Determining Alternate Assessment Eligibility:**  
**Criterion One**

## 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 IEP Team reviews multiple sources of data over time and across settings. This includes examining the student's history of instruction to confirm they have had consistent access to grade-level standards, appropriate interventions, and evidence-based instruction. The IEP Team analyzes cognitive and adaptive behavior assessments alongside progress monitoring, academic performance, and classroom data to determine if the student demonstrates pervasive and significant delays. Additionally, input from teachers, parents, and service providers is used to verify that the student's needs are not primarily the result of factors such as lack of instruction, excessive absences, or language differences.

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

The IEP Team uses cognitive assessment results, adaptive behavior assessments, and academic achievement data, as well as progress monitoring and classroom performance data over time. The IEP Team also considers instructional history, such as access to grade-level standards and interventions, along with teacher observations, parent input, and related service provider reports. Additional factors such as the student's need for extensive supports and the impact of the disability across settings are reviewed.



## 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 IEP teams use multiple, converging sources of data to support this determination and ensure it is accurate and well-documented. This data includes cognitive assessment results demonstrating significantly below-average intellectual functioning and adaptive behavior data reflecting substantial limitations in conceptual, social, and practical skills. Teams also review academic achievement data, progress monitoring results, and classroom performance over time to confirm that the student demonstrates persistent and significant delays despite appropriate instruction. Additional supporting data used are the student's instructional history, evidence of access to grade-level standards and interventions, and input from teachers, parents, and related service providers. Together, these data sources provide a comprehensive picture of the student's functioning level.

#### 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? \*

The IEP team determines the type and level of supports needed by reviewing comprehensive, individualized data and aligning supports to the student's identified needs and present levels of performance. Teams consider cognitive, adaptive behavior, and academic data, along with progress monitoring, classroom performance, and instructional history, to identify the intensity and type of support required for the student to access and make progress in the curriculum. The team also reviews teacher input, parent concerns, and related service provider recommendations to ensure supports address the student's needs across settings. For students whose least restrictive environment (LRE) is a highly modified special education setting for all or part of the day, the IEP team carefully documents why the nature and severity of the disability require more intensive supports and specialized instruction that cannot be effectively provided in a less restrictive setting. Supports are then clearly outlined in the IEP, including accommodations, modifications, assistive technology, related services, and supplemental aids and services, ensuring they are directly tied to the students' needs. This process ensures decisions are individualized, data-driven.

#### 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 IEP team distinguishes between supports required due to the student's disability and those available within the general instructional environment by closely examining individualized student data alongside the core supports provided to all students. The team first considers what is typically available through high-quality, standards-based instruction and universal support (ex: differentiation, Tier I instruction). Then, the IEP Team uses cognitive, adaptive behavior, academic, and progress monitoring data, along with teacher observations and input from parents and service providers, to determine which additional supports are necessary specifically because of the student's disability. Supports are identified as disability-related when the data show the student requires specialized instruction, significant accommodations, or modifications beyond what is routinely provided, and when these supports are essential for the student to access and make progress in the curriculum. The team ensures that all supports included in the IEP are clearly linked to the students' unique needs documented in the present levels of performance, rather

## 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.

than general instructional practices. This distinction is documented in the IEP, ensuring that decisions are individualized and data-driven.

## 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.

HCS has reviewed alternate assessment participation data alongside its overall student demographics to identify any patterns of disproportionality. While 74.3% of the student population is Black, we compare this percentage to the representation of Black students participating in the alternate assessment to ensure alignment. If the percentage of Black students in alternate assessment participation exceeds their overall enrollment, this may indicate potential disproportionality. To address and reduce any identified disproportionality, HCS has implemented a plan that includes ongoing training for IEP teams on state participation criteria, emphasizing data-based decision-making aligned to IDEA and TDOE guidance. HCS also conducts periodic reviews of participation decisions and supporting documentation to ensure appropriate use of alternate assessment criteria. Additionally, the district provides coaching and support to schools on distinguishing between significant cognitive disabilities and other factors such as instructional access or gaps in learning. HCS will continue to monitor participation data by subgroup, provide targeted professional development, and ensure consistent use of state-approved decision-making tools to promote equitable and appropriate participation across all student groups.

*(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? \*

Parents are informed of the eligibility criteria and implications of alternate assessment participation through the IEP meeting process and ongoing communication with the IEP team. During the meeting, team members review the state-established eligibility criteria using clear, parent-friendly language and explain how the student's cognitive, adaptive, and academic data align with those criteria. The team also discusses the implications of participation, including that alternate assessments are based on alternate academic achievement standards and may affect the student's instructional pathway, diploma options, and postsecondary opportunities. Parents are given the opportunity to ask questions, provide input, and participate fully in the decision-making process. This information is documented in the IEP, and parents receive prior written notice and any relevant guidance documents to ensure they have a clear understanding of both the criteria and the potential long-term impact of the decision.

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

Parents are included as active and equal members of the IEP team throughout the decision-making process. The team ensures parents are invited to all IEP meetings with sufficient notice and provided opportunities to share input regarding their child's strengths, needs, and educational goals. During meetings, parents participate in discussions about evaluation data, present levels of performance, supports, and participation decisions, including assessment options. IEP teams use clear, understandable language to explain information and encourage questions to ensure parents fully understand all options and implications. Parent input is considered in all decisions, and their perspectives are documented within the IEP. Additionally, parents are provided with prior written notice summarizing decisions made and their rights under IDEA, ensuring they remain informed and engaged partners in the development of their child's educational program.

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? \*HCS ensures that IEP decisions regarding participation are fully discussed and reviewed at least annually through established IEP development and review procedures. Each student's IEP is reviewed at least once per year during an annual IEP meeting, where the team revisits participation decisions using current data, including cognitive, adaptive, academic, and progress monitoring information. During these meetings, the IEP team is required to re-examine eligibility criteria, discuss the student's progress, and determine whether the current participation decision remains appropriate. Structured meeting protocols and state-approved decision-making tools guide these discussions. Additionally, HCS provides oversight through administrative review and monitoring processes to ensure that participation decisions are thoroughly documented, justified, and revisited annually. Ongoing communication with parents and team members further ensures that decisions remain collaborative, data-driven, and responsive to the student's evolving needs.

## 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.\* HCS implements comprehensive policies, procedures, and practices to ensure students receive instruction that meets the requirements of the Every Student Succeeds Act (ESEA) and specially designed instruction that is reasonably calculated to enable a child to make appropriate progress despite their circumstances. The IEP team develops individualized programs based on data-driven decision-making, including cognitive, adaptive, academic, and progress monitoring data, to establish rigorous and measurable annual goals aligned to state academic standards. Instruction is delivered by appropriately licensed personnel and is grounded in evidence-based practices, ensuring alignment with ESEA requirements for high-quality instruction. Specially designed instruction, accommodations, modifications, and related services are clearly outlined in each IEP to address the unique needs of the student and provide meaningful access to the general education curriculum. HCS ensures ongoing progress monitoring to evaluate student growth toward IEP goals and grade-level expectations. Data is reviewed regularly by educators and IEP teams to make timely instructional adjustments and ensure students are making appropriate progress. If progress is not sufficient, the team reconvenes to revise the IEP, related services, or supports as needed. Additionally, HCS provides professional development and coaching to ensure staff are trained in standards-based instruction, differentiation, and implementation of IEPs in alignment with IDEA, ESEA, and expectations of SDI. Administrative oversight, periodic audits of IEPs, and monitoring of student outcomes further ensure fidelity of implementation. Through these aligned practices, individualized planning, standards-based instruction, continuous progress monitoring, and ongoing review, HCS ensures students with disabilities receive meaningful educational benefit and make appropriate academic progress.

## 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. \* HCS would benefit from continued support from the department in the form of targeted training, updated guidance documents, and technical assistance related to alternate assessment participation criteria, and data-based decision-making. Additional support in analyzing participation data, particularly for identifying and addressing disproportionality across student subgroups, would strengthen the HCS's ability to ensure equitable practices. HCS would also benefit from clarification tools and exemplars, such as model IEP documentation, participation decision frameworks, and case studies that illustrate appropriate application of eligibility criteria and supports. Ongoing coaching opportunities and collaborative forums would allow staff to build consistency in implementation and share best practices. These supports would enhance the HCS's capacity to ensure all decisions are data-driven, compliant, and focused on improving student outcomes.