

## 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#

280 - Giles County

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

Page Hosay, R. Lynn

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.* \*

1.39

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.* \*

1.14

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.* \*

2.1

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

1.74

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

1.73

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

1.2

## 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.* \*

1.44

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.* \*

1.12

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.* \*

2.09

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

1.74

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

1.62

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

1.5

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

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

1.4

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

1.53

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

1.92

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

1.8

### 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. \*

1.6

## 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**. \*

7

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

8

## 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? \*

Giles County Schools views eligibility determination for alternate assessment participation as a multi-source, team-based decision-making process. Our IEP Teams conduct comprehensive reviews of data on intelligence and adaptive functioning, with particular attention to the validity and interpretation of IQ scores, consistency of adaptive deficits across raters (e.g., parents and teachers), and exclusion of confounding variables such as other disabilities or external factors that may hinder performance. The IEP team is explicitly guided by critical evaluative questions to ensure that identification reflects a true and significant cognitive disability rather than measurement error or contextual influences. Procedurally, identification involves: (1) formal documentation and certification of cognitive and adaptive deficits by the school psychologist via TN Pulse; (2) longitudinal and cross-contextual data review by the IEP team; (3) differential diagnosis to rule out alternative explanations for low performance; and (4) final team-based determination of eligibility. Our school psychologists guide our IEP Teams in understanding the implications of assessment decisions, requiring teams—including parents—to weigh the long-term consequences of alternate assessment participation. Ongoing professional development, grounded in TDOE guidance and reinforced through regular training and meetings, supports fidelity of implementation. Continual reminders are provided at special education monthly meetings and district administrators offer ongoing support in this process for special education teachers and other IEP team members. The identification of students who have performed as advanced is considered by individual student teams to encourage continual discussion regarding appropriateness for alternate assessment. IEP teams are encouraged to determine when a student may have maximized benefit from alternate assessments and should transition to standard assessments (e.g., TCAP or EOC) with accommodations. This reflects a commitment to both accurate identification and appropriate instructional alignment over time.

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

IEP Teams use cognitive and adaptive behavior data to guide them in determining students' appropriateness for participation in the alternate assessment. In alignment with guidance from TDOE, special education teachers and

## Process for Determining Alternate Assessment Eligibility:

### Criterion One

school psychologists are trained to understand that intellectual disability is not synonymous with significant cognitive disability. Therefore, IEP Teams consider multiple sources of data which include, intellectual ability, systematic observations, adaptive behavior, exclusionary factors, and developmental history.

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

IEP Teams are encouraged to consider each student's adaptive functioning across all settings (school and home) and to consider the appropriateness of the student's adaptive behavior skills when compared to their same-age peers. In addition, IEP Teams must consider if adaptive behavior scores are consistent for both parent and teacher raters.

## 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? \*

Giles County Schools is firmly committed to providing high quality instruction to all students regardless of ability level. In order to ensure all students have access to grade level content, Giles County Schools administrative staff work as a collaborative team to ensure all students have access to core instruction using high quality instructional materials (HQIM). All students are given the opportunity to access grade-level instruction and high-quality instructional materials have multiple access points so all learners can maximize their grade-level learning opportunities. Using the Acceleration for All model, Giles County Schools has increased planning time for general education teachers, special education teachers, & ESL teachers to improve access for all students. In addition, district supervisors are available to support teachers with accessing additional supports within the HQIM for students to ensure they can fully engage (e.g., pre-teach vocabulary, additional practice, alternative writing tools, etc.). Teachers are expected to (1) use the Unit Prep Protocol/Lesson Prep Protocol to identify embedded access points in the HQIM, (2) know the grade-level expectations of the standard, complex text/task, (3) know what prerequisite knowledge/skills (including those related to language) are needed in order to access the new learning, and (4) know which content might require instructional scaffolds for the access. Additional evidence of standards-based instruction at a level of rigor, intensity, and duration for all students is gathered from periodic "walk-throughs" by instructional supervisors and school administrators using the Instructional Practice Guide (IPG). The recent addition of core action four and the associated indicators ensures what access looks like for all students. The use of student work analysis for lesson preparation ensures students with disabilities receive commensurate instruction to their non-disabled peers. Using this approach, IEP teams can ensure that a student's skills are due to their significant cognitive disability and not an instructional disadvantage.

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

Data used to make an informed determination includes academic data such as formal assessments, formative assessment data, observations, student work samples, reviews of historical student data, IEP progress report, and parent input.



## 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? \***

IEP Teams analyze multiple sources of documented evidence within the IEP that collectively reflect the student's need for extensive, individualized support in accessing grade-level standards. First, the team reviews data related to the student's performance in grade-level instruction. This includes the present levels of academic and functional performance, which describe the student's current abilities and clearly show significant gaps relative to grade-level expectations. The Least Restrictive Environment (LRE) statement and service delivery plan further document the intensity, frequency, and setting of specialized instruction required, indicating that the student cannot make adequate progress in general education without substantial supports. Second, the team considers the student's assistive technology needs, including the level of prompting and support required to effectively use these tools. Evidence that the student depends on assistive technology with ongoing, direct support reinforces the need for individualized instruction. Third, the IEP Team determines the need for extensive accommodations and modifications across all instructional settings, not just in isolated contexts. This demonstrates that the student requires consistent, pervasive supports to access and engage with the curriculum. Finally, the IEP Team examines annual progress in light of the student's unique circumstances. Taken together, these components provide a comprehensive body of evidence that the student requires extensive, direct, and individualized instruction with substantial supports to achieve measurable gains in grade- and age-appropriate curriculum.

#### **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? \***

IEP Teams determine the type and level of supports needed through a comprehensive review of all available data, which includes psychoeducational data, present levels of performance, parent input, general education teacher input, special education teacher input, related service provider input, grades, work samples, etc. IEP Teams are able to use evidence matrices to identify the type, intensity, and frequency of required instruction. IEP Teams determine the specific supports necessary for students to make measurable progress in the general education curriculum, which may include specialized instructional methods, supplementary aids and services, behavior intervention planning, assistive technology, and accommodations and modifications. For students who require a highly modified special education setting, IEP Teams discuss and review the continuum of placement offerings at least annually and determine appropriateness of placement when considering all available supports to increase student participation in the general education curriculum.

#### **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? \***

We work to ensure that IEP Teams distinguish between supports required due to a student's disability and those that are part of the general instructional environment through a structured, data-based review process aligned with district procedures and TDOE guidance. IEP Teams begin by reviewing student-specific data, including present levels of performance, progress monitoring, assessment results, progress toward IEP goals and benchmarks, and observations across multiple settings. IEP Teams also consider how the student performs with naturally occurring supports available within the general education environment, such as differentiated instruction, small group instruction, and standard classroom accommodations. If the student can access the curriculum and make meaningful

# Process for Determining Alternate Assessment Eligibility:

## Criterion Three

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progress with these supports alone, they are considered part of the instructional environment rather than individualized supports. The IEP team then determines whether the student requires supports that are more intensive, explicit, and individualized than those typically available. The team also looks for evidence that these supports are needed consistently across settings and over time, not just in isolated situations. A key factor in Giles County Schools' process is whether the support is uniquely required for the student to access and make progress in grade-level standards. If the removal of a support would significantly limit the student's ability to participate in instruction or demonstrate progress, the team identifies it as a disability-related need and documents it in the IEP. Additionally, when determining placement and supports along the continuum of services, the team considers the naturally occurring supports within each setting and whether those are sufficient. If the student requires supports beyond what is typically available—even with supplementary aids and services—this may indicate the need for a more intensive level of service, including a highly modified special education setting for part or all of the day. Through this process, Giles County Schools ensures that IEPs clearly reflect supports that are individualized, necessary, and aligned to the student's disability-related needs, while distinguishing them from supports that are broadly available to all students.

## 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.

Alternate assessment participation rates by primary eligibility indicate that district distribution at 48.72% is well above the State distribution rate of 33.88% for students with Autism. The district distribution rate for functional delay (5.13%) significantly exceeds the State distribution rate of .45%. The district distribution rate for students with an Intellectual Disability (35.90%) is below the State distribution rate of 47.17%. The district distribution rates of other health impairments (2.56%) and multiple disabilities (7.69%) are below the State distribution rates of 3.69% and 9.69%, respectively. Alternate Assessment Participation rates for all other disability categories are below the State rates. By studying the data on the characteristics of students participating in the alternate assessment, the district is better able to isolate patterns of participation indicating disproportionality and subsequently to address through training the ability of IEP teams to fairly and equitably apply participation criteria across all disability categories and demographics. The district will use existing data from national studies as a benchmark for judging whether there might be students participating in the alternate assessment who do not have significant cognitive disabilities. The district will collect data on the characteristics of these alternate assessments students and analyze this data from the perspective of disproportionality. The district will provide training for IEP team members responsible for making alternate assessment participation decisions for students to ensure that Teams follow the guidance from TDOE regarding alternate assessment participation and ensure that decisions made regarding alternate assessment participation are based on a comprehensive analysis of student data across all settings. In further review of disproportionality data, it is noted that district participation rates across ED status and gender closely aligns with State participation rates. Giles County Schools did not have any students identified as English learners participate in the alternate assessment compared to the State participation rate of 3.91%. Across race and ethnicity analysis, Giles County Schools had fewer students identified as African American (25.64%) and Hispanic (5.13%) participating in alternate assessment than the State rates of 34.62% and 12.37%, respectively. The district participation rate for white students at 66.67% far exceeds the State participation rate of 49.30% for white students. These numbers are reflective of a larger population of white students at both the State and district level.

*(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? \* The assessment participation decision is arrived at annually by the IEP team, including the parent(s) or guardians of the student (or student at age 18). A district matrix/guide assists IEP teams in the decision making process ensuring that due consideration is given to all factors included in the criteria for participation. Special education staff and school counselors facilitate team conversations regarding the implications of a student's instructional path that may include alternate assessment. Parents are informed of the potentiality that the student will not meet requirements for a regular high school diploma. Other diploma options are explained and discussed with the parents. Parents are given printed materials from Transition Tennessee regarding diploma options (<https://transitiontn.org>). Assessment participation is an element of the digital IEP process within TN Pulse that must be addressed before an IEP can be finalized. Students who take this assessment will have significant cognitive disabilities that affect the student in both ELA and math, and in all settings (including home and school). Academic achievement will be measured based on alternate achievement standards. Parents receive written notice of all decisions made by the IEP team through a Prior Written Notice. The IEP is not implemented for fourteen days giving the parent the opportunity to request another meeting or to file a due process complaint if they are in disagreement with the decisions of the team.

34. How are parents included in the IEP team decision-making process? \*Giles County Schools works diligently to ensure that all parents play an integral role in their child's IEP Team. In order to do so, Giles County School elicits parental involvement through requesting parent participation in IEP meetings, requesting parent input be provided on student's strengths, weaknesses, concerns for prevocational and transition skills, eliciting parent assistance with IEP goal and benchmark development, etc. In addition, Giles County Schools works to ensure that parents have access to available support to guide them in decision making by providing access to resources via our webpage, providing paper copies of important information for outside resources/supports, offering contact information for outside supports (mental health referrals, advocacy contacts, vocational rehabilitation, MAPS, Pre-ETS, etc.).

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? \*Training is provided to our school psychologists and special education teachers regarding TDOE criteria for participation in alternate assessment. As such, IEP Teams are instructed and required to annually review student participation in alternate assessment. IEP Teams are required to conduct a comprehensive analysis of all student data and to determine appropriateness for assessment participation based on current data across all domains.

## 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.\*

Giles County Schools ensures that students participating in alternate assessments receive standards-based instruction and make appropriate academic progress through a coordinated system of policies, procedures, and instructional practices aligned with the requirements of the Elementary and Secondary Education Act (ESEA) and the standard articulated in *Endrew F. v. Douglas County School District*. Giles County Schools requires that all IEPs be developed using present levels of academic and functional performance, ensuring that goals and services are reasonably calculated to enable progress in light of the student's individual circumstances. IEP teams, including school psychologists, special educators, general educators, and families, are responsible for aligning goals to grade-level academic standards, even when instruction is significantly modified or delivered through alternate achievement standards (e.g., DLM). Giles County Schools conducts a comprehensive review of cognitive and adaptive behavior data, guidance from TDOE, and team-based decision-making to ensure that only students with significant cognitive disabilities are identified. Annual IEP reviews include an analysis of DLM data to evaluate whether the student continues to benefit from alternate assessment or should transition to the general assessment with accommodations. Our district prioritizes Acceleration for All students and using the Instructional Practice Guide (IPG) along with bi-yearly walk-throughs, our district staff are able to ascertain access to HQIM for all students and provide corrective measures if needed. In accordance with Federal requirements, Giles County Schools provides families with quarterly IEP progress reports and incorporates discussion of these progress reports into our IEP decision making process. Moreover, IEP Teams review a plethora of data to ensure appropriateness of alternate assessment participation.

## 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. \* We would love to have training provided directly by TDOE for our special education teachers, administrators, and school psychologists regarding alternate assessment participation.