

## 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#

290 - Grainger County

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

Ginny McElhaney

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.* \*

1.43

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.* \*

1.25

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.* \*

1.15

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

1.27

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

1.24

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

1.1

## 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.* \*

1.19

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.* \*

1.17

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

1.27

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

1.13

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

1.1

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

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

1.78

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

1.24

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

1.16

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

1.22

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

1.16

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

1.1

## 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**. \*

2

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? \*

Grainger County adopts a structured and thorough approach to identifying students with significant cognitive disabilities, emphasizing training, data-informed practices, and adherence to clear state-defined criteria. The district's process ensures IEP teams accurately and consistently identify students requiring alternative assessments. This process begins with training for IEP team members, including special education teachers, school psychologists, administrators, and related service providers. These training sessions provide resources, such as state policy documents, and emphasize the established criteria for identifying students with significant cognitive disabilities.

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

The determination process is rooted in a comprehensive, data-driven approach. IEP teams review multiple sources of information to create a complete profile of each student. Standardized cognitive assessments, adaptive behavior scales, and other qualitative data, are carefully analyzed. Additionally, the student's personal history and other relevant documentation are considered to ensure an accurate and well-rounded evaluation.

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

Teams rely on adaptive behavior data with standardized rating scales and questionnaires completed by parents, teachers, and other individuals familiar with the student to assess functional skills across domains such as communication, social interaction, daily living skills, and self-care. After evaluating all data points and ensuring alignment with state-defined criteria, IEP teams determine whether the student meets the qualifications for having a significant cognitive disability. This process ensures that only students with the most significant cognitive impairments are identified as needing alternative assessments.

## 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 carefully evaluates whether a student's skill deficits are due to a significant cognitive disability or an instructional disadvantage by reviewing multiple data sources to create a complete profile of each student. Standardized cognitive assessments, adaptive behavior scales, and other qualitative data, are carefully analyzed. Additionally, the student's personal history and other relevant documentation which the team examines whether appropriate instructional support, accommodation, and modifications have been effectively implemented. They also assess whether the student's progress aligns with their cognitive potential. Consistent patterns of performance indicative of a significant cognitive disability, rather than gaps caused by insufficient instruction, are central to the decision-making process.

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

Multiple sources of information are used to create a complete profile of each student. Standardized cognitive assessments, adaptive behavior scales, and other qualitative data, are carefully analyzed. Additionally, the student's personal history and other relevant documentation are used to make an informed determination.

## 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? \*

Multiple sources of information are used to create a complete profile of each student. Standardized cognitive assessments, adaptive behavior scales, and other qualitative data, are carefully analyzed. Additionally, the student's personal history and other relevant documentation are used to make an informed determination.

#### 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 for each student through a collaborative, individualized decision-making process using current data, present levels of academic achievement and functional performance, and careful consideration of the student's least restrictive environment. Decisions are based on the student's instructional needs, access skills, and response to evidence based accommodations rather than disability type, instructional setting, or anticipated assessment performance. For students whose supports include a highly modified special education setting for all or part of the day, IEP teams carefully examine whether the student can meaningfully participate in the TCAP assessment with appropriate accommodations, and supplemental aids and services. Placement in a more restrictive setting alone does not determine the need for alternate assessment participation. IEP teams review multiple sources of evidence, including progress monitoring data, classroom performance, work samples, behavioral and communication supports, and the extent to which the student can engage with grade-level academic standards. Teams also ensure that decisions are aligned with state eligibility criteria for alternate assessments and that the student's cognitive functioning and adaptive behavior demonstrate a need for alternate achievement standards. Access to grade level instruction whenever appropriate is considered, while ensuring students receive the level of support necessary to demonstrate their knowledge and skills. This approach supports decision making, helps prevent overidentification for alternate assessments, and aligns with the requirement to reduce reliance on alternate assessments while maintaining individualized, equitable educational opportunities for students with disabilities.

#### 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 supports required due to a student's disability and supports that are part of the general instructional environment by intentionally examining the access to high-quality instructional materials available to all students. The team considers whether a support is necessary for the student to access instruction and demonstrate learning as a result of the student's disability, or whether it is a universally available instructional practice provided to all students. Supports required due to a student's disability are those that are individualized, essential for access to grade-level content, and documented in the IEP. These supports address specific needs arising from the student's disability and would not be available to the student without an IEP. Supports that are part of the instructional environment include general education strategies and school-wide practices such as differentiated instruction, flexible grouping, visual supports, extended time built into classroom routines, and are available to all



## 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.

students. When evaluating assessment participation, the IEP team specifically ensures that the determination is not based on the level of instructional support, the type of classroom setting, or the presence of available strategies. Instead, teams focus on whether the student can meaningfully engage with grade-level academic standards and assessments when provided with appropriate accommodations and disability-related supports. The presence of significant instructional supports alone does not indicate the need for alternate academic achievement standards. This distinction ensures that assessment decisions are individualized, standards-based, and consistent with the principles of high expectations and access, helping prevent inappropriate identification for alternate assessments and supporting efforts to reduce participation rates while maintaining compliance and equity.

## **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.

The LEA student population is composed of approximately 91.3% White students and 8.7% Hispanic students. A review of alternate assessment participation data indicates that participation generally reflects the overall demographic makeup of the district. At this time, there is no significant disproportionality identified in alternate assessment participation across racial or ethnic groups when compared to overall enrollment.

*(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? \* At the initial eligibility meeting, parents are provided with a comprehensive explanation of the requirements for alternate assessment participation. This includes written materials, such as state guidelines, and a detailed verbal overview of the eligibility criteria. The explanation highlights the characteristics of significant cognitive disabilities that qualify a student for the alternate assessment and outlines how eligibility is determined using data and evidence.
34. How are parents included in the IEP team decision-making process? \*The IEP team, including the parents, engages in a discussion about the implications of alternate assessment participation. This includes how the assessment aligns with the student's educational goals and post-secondary outcomes. The team emphasizes that the alternate assessment is specifically designed for students with the most significant cognitive disabilities and explains how it differs from the standard assessment in terms of content, format, and expectations. To ensure parents have a thorough understanding of their child's academic profile, the team presents relevant data, such as cognitive assessments and adaptive behavior evaluations. Parents are encouraged to review and discuss this data, allowing them to make informed contributions to the eligibility determination 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? \*During each annual IEP meeting, the team reviews the student's progress, updates assessment data, and reconsiders the appropriateness of alternate assessment participation. This ensures the decision remains aligned with the student's current needs and abilities. 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.

## 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.\*

The LEA has established policies, procedures, and instructional practices to ensure all students receive instruction that meets the requirements ESEA and the standard set forth in *Endrew F. v. Douglas County School District*, with the expectation that students make meaningful and appropriate academic progress. Curriculum and instruction are aligned with state academic standards, and evidence-based instructional practices are implemented across general and special education settings. All students have access to high-quality Tier I core instruction, with Tier II and Tier III interventions provided through a structured Multi-Tiered System of Supports framework. Instructional decisions are guided by data and regularly adjusted to meet individual student needs. For students with disabilities, IEP teams develop individualized programs that include appropriately ambitious, measurable annual goals aligned to grade-level standards when appropriate. IEPs clearly outline specially designed instruction, related services, accommodations, and supports necessary to enable progress in light of the student's circumstances. General and special educators collaborate to ensure instruction is implemented with fidelity and delivered in the least restrictive environment to the maximum extent appropriate. The LEA uses multiple measures of progress monitoring, including universal screening data, progress toward IEP goals, classroom-based assessments, and state and local assessments. These data are reviewed regularly by instructional teams and IEP teams to determine effectiveness of instruction and to make timely adjustments. When students are not making expected progress, teams reconvene to revise instructional strategies, interventions, or services as needed. Professional learning is provided to administrators, teachers, and related service providers to support implementation of high-quality instruction, progress monitoring, and standards-based IEP development. Ongoing administrative oversight and documentation reviews help ensure compliance with ESEA and IDEA requirements and promote continuous improvement in instructional outcomes.

## 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. \*

Grainger County Schools would be interested in in-person training for special education staff, supervisors, LEA representatives, and school psychologists focused on best practices for accurately identifying students who meet eligibility criteria and would benefit from participation in an alternate assessment.