

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#

301 - Greeneville

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

Jeff Townsley

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

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.* *

2.66

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.* *

2.29

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

2.22

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

2.06

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

1.68

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.* *

2.03

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.* *

2.66

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.* *

2.26

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

2.27

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

1.85

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

1.69

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

16. Science Participation Rates 2020-21 *

2.27

17. Science Participation Rates 2021-22 *

2.68

18. Science Participation Rates 2022-23 *

2.49

19. Science Participation Rates 2023-24 *

2.01

20. Science Participation Rates 2024-25 *

3.09

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

1.84

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**. *

9

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

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Process for Determining Alternate Assessment Eligibility:

Criterion One

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

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

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

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

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

IEP teams are typically informed of the criteria and expectations for determining a student's participation (including whether they meet expectations for general state assessments or alternate assessments) through conversations both prior to IEP meetings and during IEP meetings should clarification be needed. These conversations are led by our school psychologist. All IEP case managers are given information each year at our annual special education professional development day. The information contained within the TNDOE Alternative Assessment Participation Guidelines document is used for this training.

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

The IEP team considers the whole child even when considering a cognitive disability. The team must determine if the student's background or other factors may have impacted the cognitive assessment results. Was the student given the best assessment for them to show what they truly know given other factors such as language delays, being nonverbal, ESL status, etc.? They also examine all the subtest scores and not just the overall full-scale score of an intelligence test which might be misleading about what a student truly knows and how they can actually perform.

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

The team also looks at the adaptive functioning of the student from the school and home perspectives. Students who are truly cognitively impaired (1% of students) show commensurately low adaptive skills when compared to their same age peers no matter the setting. The team looks for significantly low adaptive skills in conceptual skills, practical skills, and social skills, along with cognitive skills that are significantly delayed.

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 team works collaboratively to make sure the current grade-level standards are broken down into smaller skills and chunks so that they are assessable, although modified, yet aligned for the student. The committee also in collaboration, based on the student's strengths, outlines, how the student's goals and short-term objectives reflect how the student is expected to make progress toward mastery of standards-based instruction and functional life skills.

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

The IEP team examines current norm-referenced based academic testing, survey-level assessments, formative and summative assessments from the regular classroom, along with work samples from the regular classroom. Classroom observations from school professionals such as school psychologists, speech pathologists, special education educators, etc. are reviewed. Regular educator and parental input are also included.

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 use a comprehensive body of quantitative and qualitative data to determine whether a student requires extensive individualized instruction and substantial supports. This includes: Formal assessment data: Cognitive assessments, Academic achievement testing (reading, math, written language), and Adaptive behavior scales (e.g., communication, daily living skills, socialization) Classroom-based evidence: Formative and summative assessments (with and without accommodations), Curriculum-based measurements (CBMs), and Progress monitoring data tied to IEP goals Work samples including student assignments compared to grade-level and same-age peers and evidence of skill acquisition or lack of progress over time. Observational data including structured classroom observations in general and special education settings Educator and service provider input including teacher interviews and ratings, related service provider reports (e.g., SLP, OT, behavior specialists) Parent/guardian input Together, this data helps the team evaluate the impact of the disability on access, progress, and participation in the general 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 a student needs through a data-driven, individualized decision-making process that considers both academic and functional performance across settings. The team begins with the student's present levels of academic achievement and functional performance to identify what the student can do independently, what they can do with supports, and where significant gaps exist in relation to grade-level expectations. This is informed by a combination of progress monitoring data, classroom-based formative and summative assessments, curriculum-based measurements, observational data from both general and special education settings, work samples, and input from teachers, related service providers, and parents or guardians. The team then evaluates the student's response to increasingly intensive levels of instruction and intervention, including the effectiveness of accommodations, modifications, push-in support, and pull-out services. For students whose needs may extend into a highly modified special education setting, the team considers whether meaningful progress can be achieved within the general education environment even with supplementary aids and services, or whether the intensity, structure, and specialization of instruction required exceeds what can reasonably be provided in less restrictive settings. This determination also includes consideration of adaptive functioning and social-emotional needs alongside academic progress to ensure a comprehensive understanding of the student's ability to access instruction, engage in learning, and demonstrate measurable gains.

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-related supports and general instructional supports by determining whether a support is part of what all students naturally receive in the classroom or whether it is specifically needed because of the student's disability in order to access and make progress in instruction. General instructional or environmental supports are those built into everyday teaching and school practices for all students. These include things like high-quality core instruction, classroom routines and structure, general differentiation by the teacher, and schoolwide

Process for Determining Alternate Assessment Eligibility:

Criterion Three

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behavior expectations. These supports are available regardless of whether a student has an IEP. In contrast, disability-related supports are those that are uniquely designed or provided to meet the individual needs of the student because of how their disability impacts learning and participation. These supports are required for the student to access instruction, participate meaningfully, or show what they know. Examples may include individualized or small-group specialized instruction, modified curriculum, visual supports, assistive or augmentative communication systems, behavior intervention plans, task breakdowns, or frequent adult prompting and redirection. The IEP team makes this distinction by asking whether a support is something any student in the classroom would receive as part of standard instruction, or whether it is necessary only because of the student's disability-related needs. If the support is essential for the student to access the curriculum or make measurable progress and would not be provided universally to all students, it is considered an IEP-required support rather than part of the general instructional environment.

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.

We reviewed alternate assessment participation data by disability category and demographic groups and compared our participation patterns to statewide data, as well as to overall district and state enrollment demographics. Overall, most areas align with state trends; however, the review indicates potential disproportionality in race and ethnicity and participation within certain disability categories. When reviewing race and ethnicity, White students are overrepresented in our alternate assessment participation compared to statewide participation rates, while Black or African American students are underrepresented. Hispanic student participation is slightly higher than the statewide average. Public enrollment data show that our district's overall student population includes a higher proportion of White students and a lower proportion of Black or African American students than the state as a whole, while Hispanic enrollment is closer to—or slightly higher than—the state average (NCES; TDOE). When viewed in this context, the racial disproportionality observed in alternate assessment participation generally reflects the underlying racial makeup of the district rather than an isolated pattern specific to alternate assessment eligibility alone. However, we recognize that enrollment demographics do not fully explain disproportionality and that continued review is necessary to ensure equitable decision-making. In addition, participation by disability category shows higher local representation for students identified with Functional Delay and Other Health Impairment compared to statewide alternate assessment participation rates. These disability categories make up a larger share of our alternate assessment population than they do at the state level, indicating a need to continue reviewing eligibility decisions to ensure participation is based on students meeting criteria for the most significant cognitive disabilities, rather than disability label alone. We will continue to monitor alternate assessment participation data by subgroup and review eligibility decisions to ensure they are appropriate, data-driven, equitable, and aligned with state and federal guidelines.

*(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 participation in the alternate assessment through a structured review of student data and discussion during the IEP meeting. The IEP team presents the student's current levels of performance, including formal evaluation results such as cognitive assessments, adaptive behavior rating scales, eligibility determination, and classroom performance data from teachers and service providers. The team explains the specific eligibility requirements for the alternate assessment, emphasizing that it is intended for students with the most significant cognitive disabilities. Parents are also provided with clear descriptions of all state assessment options, including both general and alternate assessments, to help them understand differences in expectations and content. Additionally, the IEP team discusses the implications of participation, including how alternate assessments are aligned to highly modified academic standards and may impact the student's ability to earn a traditional diploma. This information is communicated in clear, understandable language so parents can make an informed decision.

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

Parents are included as active participants in the IEP team decision-making process through ongoing collaboration and meaningful discussion during the IEP meeting. After reviewing all relevant data and assessment options, the team encourages parents to ask questions, share input, and express concerns regarding their child's educational program and assessment participation. The decision about whether a student will participate in the alternate assessment is made collaboratively, with the IEP team considering both the data and the parent's perspective. Parents contribute valuable insight into their child's needs across settings, and their input is an essential part of the decision-making process. If the team determines that the alternate assessment is appropriate, the parent's agreement is documented within the IEP.

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? *Participation in the alternate assessment is reviewed at least annually as part of the IEP review process. During each annual IEP meeting, the team revisits the student's current performance data, including updated evaluations, progress monitoring, classroom performance, and input from teachers, service providers, and parents. The IEP team uses this updated information to determine whether the student continues to meet the eligibility criteria for the alternate assessment. The team also discusses whether the student may be able to transition to the general assessment, based on their progress and ability to access the general education curriculum with supports. This ensures that the decision is not static and is instead based on the student's current needs and performance. These discussions are documented within the IEP, confirming that assessment participation has been fully considered and reviewed. This annual process ensures ongoing parent involvement and supports informed, data-based decision-making regarding assessment participation.

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.* We use district policies, procedures, and instructional practices to ensure students receive instruction that is aligned with ESEA requirements and supports meaningful academic progress based on individual student needs. IEP teams use a variety of data—including formal and informal assessments, progress monitoring, classroom performance, work samples, observations, and input from teachers and parents—to determine present levels of performance and develop appropriate, individualized goals. This helps ensure instruction is appropriately challenging and based on each student's current skills and needs. Students receive supports such as accommodations, modifications, and specialized instruction to help them access the general curriculum to the greatest extent possible. Progress is monitored on an ongoing basis, and IEPs are reviewed at least annually to determine whether goals and services need to be adjusted. Overall, our focus is on using data to guide instruction, matching supports to student needs, and ensuring students are making steady and meaningful 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. * We have established effective processes to ensure that IEP teams appropriately determine eligibility, inform parents, and review participation in alternate assessments on an annual basis. Our current practices include the use of comprehensive student data, collaborative team discussions, and clear documentation procedures, which support compliance with state and federal requirements. At this time, we feel that these systems are functioning well; however, continued support from the department in the form of ongoing professional development would be beneficial. Specifically, access to state- and regional-level training opportunities, workshops, and updated guidance would help ensure that our staff remain current on best practices, policy updates, and expectations related to alternate assessment participation and IEP decision-making. Ongoing training opportunities would also support consistency across teams and provide valuable opportunities for staff to refine their practices and engage in deeper learning. We welcome any additional resources, technical assistance, or professional learning sessions offered by the department to further strengthen our implementation.