

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#

350 - Hardeman County Schools

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

Shaw, Monica

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

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

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

2.1

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

2.2

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

1.8

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.* *

2.2

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.* *

1.9

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

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

2.3

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

1.7

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

2.1

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

16. Science Participation Rates 2020-21 *

1.9

17. Science Participation Rates 2021-22 *

1.8

18. Science Participation Rates 2022-23 *

1.9

19. Science Participation Rates 2023-24 *

1.5

20. Science Participation Rates 2024-25 *

1.9

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

1.4

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? *

Hardeman County Schools informs IEP teams of the expectations and criteria for participation in the TCAP Alternate Assessment through district training, state guidance, and ongoing support provided throughout the school year. The district utilizes guidance and resources provided by the Tennessee Department of Education, along with Tennessee State Board of Education requirements, to assist teams in making appropriate assessment decisions for students with disabilities. IEP teams are expected to use multiple sources of student information when making participation decisions, including cognitive assessment results, adaptive behavior data, classroom performance, academic progress, progress monitoring, teacher input, and information regarding the level of instructional support required by the student. IEP teams are expected to document the basis for assessment decisions within the IEP, and the Alternate Assessment Worksheet in TN PULSE is used to support the discussion and review process. Assessment decisions are made individually for each student and are not based solely on disability category, placement, or the need for accommodations. During the IEP process, district special education staff and administrators are available to provide guidance and support to school teams as needed. This includes periodic reviews of IEP documentation and student data to confirm that participation decisions are supported by appropriate evidence and remain appropriate for the student. Participation decisions are reviewed at least annually and documented with clear rationale to ensure continued appropriateness in alignment with state expectations and federal accountability requirements.

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

IEP teams in Hardeman County Schools utilize a comprehensive, multi-source body of data to determine eligibility for participation in the TCAP Alternate Assessment, ensuring decisions are individualized, objective, and consistent with state criteria. This includes formal cognitive assessments that measure intellectual functioning and adaptive reasoning, such as standardized measures of cognitive ability (e.g., WISC-V, CTONI-2, PTONI, DAYC-2), as well as adaptive behavior assessments that evaluate the student's conceptual, social, and practical skills needed for daily functioning (e.g., Vineland-3, ABAS-3, DP-4). In addition, IEP teams review academic achievement data from curriculum-based measures and standardized assessments, classroom performance data, progress monitoring records, and work

Process for Determining Alternate Assessment Eligibility:

Criterion One

samples that reflect the student's instructional level and response to specially designed instruction. Functional and developmental information, including communication abilities, independence skills, and level of support needs, is also considered alongside teacher observations and related service provider input. This comprehensive data set is analyzed collectively to determine whether the student demonstrates a significant cognitive disability and requires extensive, individualized support to access grade-level aligned content, consistent with Tennessee's state-defined participation criteria for the alternate assessment.

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

Adaptive behavior data is a required and integral part of the decision-making process used by IEP teams in Hardeman County Schools when determining eligibility for participation in the TCAP Alternate Assessment. This information is used in conjunction with cognitive and academic data to determine whether a student meets criteria for a significant cognitive disability and requires extensive, individualized supports to access and make progress in grade-level standards. IEP teams review standardized adaptive behavior assessments, typically completed by caregivers and educators, such as the Vineland-3 or ABAS-3, along with other available measures (e.g., DP-4 when applicable). These assessments evaluate functioning across the conceptual, social, and practical domains. In addition to standardized scores, IEP teams also consider teacher reports, structured classroom observations, parent input, and functional performance data documented in the Present Levels of Academic Achievement and Functional Performance (PLAAFP). This information helps the IEP team determine the intensity of instructional support required and whether the student's instructional needs align with the state definition of a student eligible for alternate assessment participation. Documentation of adaptive behavior data and its interpretation is included in the IEP record to support a transparent, data-based rationale for the participation decision, which is reviewed annually.

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 ensures that a student's performance and skill level are attributable to a significant cognitive disability rather than an instructional disadvantage by conducting a thorough review of multiple sources of evidence and explicitly ruling out external factors that may impact achievement. This process includes examining the student's educational history, access to standards-based instruction, attendance patterns, prior interventions, and opportunities to learn within the general and specialized curriculum. IEP teams review whether the student has received consistent, evidence-based instruction delivered with appropriate accommodation and support over time. To distinguish disability-related needs from instructional disadvantage, the IEP team analyzes formal cognitive assessments, adaptive behavior data, academic achievement results, progress monitoring records, classroom observations, and response to interventions. These data sources are considered collectively to determine whether the student's learning profile reflects pervasive and significant limitations in intellectual and adaptive functioning rather than gaps resulting from limited exposure, inconsistent instruction, excessive absences, cultural or linguistic differences, or environmental factors.

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

IEP teams in Hardeman County Schools ensure that a student's performance and skill level reflect a significant cognitive disability rather than an instructional disadvantage by reviewing multiple sources of data to confirm the student has had meaningful access to standards-based instruction. These data include lesson plans, curriculum maps, instructional materials, and documentation of specially designed instruction aligned to Tennessee academic standards. The Present Levels of Academic Achievement and Functional Performance (PLAAFP), standards-based IEP goals, and instructional supports are reviewed to confirm that instruction has been appropriately designed and delivered based on the student's needs. To further determine whether performance reflects a disability rather than lack of instruction, IEP teams review progress monitoring data over time to evaluate the student's response to instruction and intervention. Classroom performance data, including work samples, formative assessments, teacher observations, state assessment results, and district benchmarks are analyzed to determine the student's engagement with content and rate of learning. By integrating these multiple data sources, the IEP team is able to make an individualized, evidence-based determination that aligns with Tennessee's alternate assessment participation criteria and accurately reflects the student's needs.

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 process used to determine that a student requires extensive, direct individualized instruction and substantial support begins with a comprehensive review of the student's present levels of academic achievement and functional performance. The IEP team examines whether the student can access, engage with, and make progress in grade-level standards only through significant modifications, systematic instruction, and ongoing adult support. This determination is not based on a single assessment, but on a pattern of evidence collected over time and across settings. To support this decision, the team reviews multiple data sources, including formal cognitive assessments, adaptive behavior evaluations, classroom performance records, progress monitoring data, curriculum-based assessments, and work samples. Teacher observations and related service provider reports are used to document the level of prompting, repetition, and individualized strategies required for the student to learn and retain new skills. Functional data, such as communication abilities, independence in daily routines, and generalization of learned skills, are also considered to assess the degree of support needed for participation in both academic and nonacademic environments. The team further analyzes the student's response to prior interventions and instructional approaches, including whether progress has occurred only with highly structured, direct teaching methods delivered in small-group or individualized settings. Documentation of accommodations, assistive technology, and behavioral supports is reviewed to determine the intensity and consistency of supports required throughout the school day. Collectively, these data establish whether the student's educational needs align with Tennessee's expectation that students participating in the alternate assessment require extensive, direct individualized instruction and substantial support to achieve measurable progress in the 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 support needed by conducting an individualized review of the student's present levels of academic achievement, functional performance, and access needs across instructional environments. This process begins with analysis of evaluation data, progress monitoring records, classroom observations, teacher and related service provider input, and documented response to previous accommodations, modifications, and interventions. The team identifies the specific barriers that affect the student's ability to participate in and make progress within the curriculum and then aligns supports to address those barriers in a measurable and meaningful way. For students whose least restrictive environment is a highly modified special education setting for all or part of the day, the IEP team gives particular attention to the intensity, frequency, and duration of support required for meaningful participation. Data reviewed may include adaptive behavior results, communication needs, independence skills, behavioral supports, and the level of prompting necessary for task completion. IEP teams also examine whether the student demonstrates progress with direct, explicit instruction in structured settings and whether supports must be embedded consistently throughout the day. This helps determine if the student requires specialized materials, assistive technology, adult facilitation, environmental modifications, or individualized instructional pacing. The team documents the relationship between the student's disability-related needs and the services required to access instruction. Supports are then described in the IEP with sufficient specificity to ensure implementation across settings. This process ensures that students receive the least restrictive environment appropriate to their needs while maintaining access to individualized supports necessary for educational benefit.

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.

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 supports that are available as part of the general instructional environment by carefully analyzing whether the support is uniquely necessary for the student to access, participate in, and make progress in instruction, or whether it is a standard resource routinely provided to all students within that setting. This distinction is made through a review of individualized evaluation data, classroom performance, progress monitoring, and observations across environments. Disability-related supports are documented in the IEP as specially designed instruction, accommodations, modifications, assistive technology, or related services. These supports are individualized in nature and are required consistently for the student to achieve measurable progress. Some examples may include one-to-one prompting, alternative communication systems, sensory regulation strategies, or individualized pacing beyond what is typically available in the classroom. Instructional environment supports, such as small-group instruction, classroom visuals, structured schedules, or access to general classroom technology, may benefit the student, however, may not be considered evidence of disability-related need unless data demonstrate that the student requires them at a level of intensity, frequency, or customization beyond what peers receive. To make this distinction, the IEP team reviews whether the student's success depends on individualized support that would not be necessary in the absence of the disability. The team also considers whether the support remains essential across settings and providers, indicating a disability-driven need rather than an environmental feature. This process ensures that decisions regarding services and alternate assessment participation are based on the student's unique disability-related needs rather than the characteristics of the instructional setting alone.

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.

Hardeman County Schools recognizes the importance of continuing to analyze whether alternate assessment participation rates are proportionate to the district's overall student enrollment and disability population rather than relying solely on numerical subgroup representation. At this time, no statistically significant disproportionality has been formally identified in alternate assessment participation; however, the district continues to closely monitor participation patterns to ensure equity and appropriate decision-making. The district is in the process of strengthening internal review procedures to ensure that participation decisions are based on individualized student needs and consistent application of state eligibility criteria. Current data reviews have not identified evidence that alternate assessment decisions are being made solely on the basis of race, ethnicity, disability label, educational placement, or socioeconomic factors. However, because the district exceeded the 1.0 percent participation threshold, the district recognizes the need for continued monitoring to ensure that no student group is disproportionately represented.

*(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? *

During eligibility and annual IEP meetings, parents are engaged as active members of the decision-making team and are provided with information regarding the criteria used to determine participation, including the presence of a significant cognitive disability, the need for extensive individualized instruction, and the requirement for substantial support across settings. The IEP team explains that participation in the alternate assessment is based on multiple sources of data, not placement or disability category alone, and reviews the evidence supporting the decision in language accessible to the parent. Teams also discuss the broader implications of participation, including how instruction will remain aligned to grade-level standards with significant modifications, the impact on diploma pathways, and how alternate assessment participation may affect postsecondary planning and transition services. Parents are further informed through procedural safeguards, prior written notice, and state or district-developed informational resources that outline alternate assessment expectations. Documentation of these discussions is maintained within the IEP record to ensure transparency and shared understanding. This process ensures that parents are equipped to make informed contributions to the decision and understand both the eligibility criteria and long-term educational implications of alternate assessment participation.

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

Parents are included in the IEP team decision-making process as equal and essential members of the team, consistent with federal and Tennessee special education requirements. Their participation begins with timely notification of meetings and opportunities to contribute to scheduling, ensuring that they can meaningfully attend and engage in discussions regarding their child's educational program. During the meeting, parents are invited to share their perspectives on the student's strengths, needs, functioning at home and in the community, and long-term goals, all of which provide critical context for educational planning. As part of the decision-making process, the IEP team reviews evaluation data, progress reports, and instructional information with parents in understandable language, ensuring they have the information needed to participate fully in determining services, supports, placement, and assessment participation. Parents are encouraged to ask questions, provide input, and express concerns before decisions are finalized. Their observations and priorities are considered alongside formal data when developing goals, selecting accommodations, and determining appropriate supports. For decisions related to alternate assessment participation, parents are specifically informed of eligibility criteria, the rationale for the proposed determination, and the educational implications of participation. Their agreement or concerns are documented as part of the IEP process. Procedural safeguards, prior written notice, and access to advocacy resources further support parent involvement and informed consent. Through these practices, parents are not passive recipients of information, but active collaborators in developing an individualized educational program that reflects the student's needs and family priorities.

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? *Hardeman County Schools ensures that participation in the alternate assessment is reviewed at least annually, with additional review occurring whenever new data or changes in student performance indicate a need for reconsideration. During each annual IEP review, assessment participation is a required agenda item, ensuring that the team revisits the student's current eligibility based on updated academic, functional, cognitive, and adaptive behavior data. As part of this process, the IEP team reviews progress toward annual goals, classroom performance, progress monitoring data, teacher observations, and any newly available evaluation results. Teams also consider the student's current instructional needs, including the level of support required to access grade-level content and whether instruction continues to require

extensive, individualized supports aligned to alternate academic achievement standards. If data indicate increased independence, improved access to grade-level standards, or a reduced need for intensive supports, the IEP team discusses whether the student may appropriately participate in the general assessment with or without accommodations. These decisions are made collaboratively and are based on current student performance rather than prior placement decisions or historical participation. To ensure consistency and compliance, the district conducts periodic reviews of IEP documentation and assessment participation decisions to confirm that eligibility determinations are supported by current data and appropriately documented in the IEP.

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.*

Hardeman County Schools recognizes that students participating in alternate assessments must have access to rigorous, standards-based instruction and individualized supports designed to enable meaningful academic progress in light of each student's unique circumstances. The district ensures that all students, including students with the most significant cognitive disabilities, are provided access to instruction aligned with Tennessee academic standards. For students participating in the alternate assessment, instruction is aligned to alternate academic achievement standards that maintain a connection to grade-level content while addressing individualized learning needs. Access to standards-based instruction is supported through IEP development, instructional planning, specially designed instruction, and ongoing administrative oversight. IEP teams are responsible for developing measurable annual goals based on present levels of academic achievement and functional performance, current evaluation data, progress monitoring results, classroom performance, and other relevant student information. Teams use multiple data sources, including academic, cognitive, adaptive behavior, and functional performance data, to guide instructional and service decisions. Progress toward IEP goals is monitored regularly, and teams review student performance data to determine whether instructional strategies, services, supports, or accommodations need to be adjusted to ensure continued progress. The district emphasizes evidence-based instructional practices, differentiated instruction, explicit teaching strategies, and individualized supports to address each student's learning needs. Teachers utilize ongoing formative assessment, progress monitoring, and classroom-based data to evaluate student response to instruction and make instructional adjustments as needed. Collaboration among general education teachers, special education teachers, related service providers, administrators, and families is encouraged to support consistent implementation of services and supports across educational settings.

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. *

Hardeman County Schools would benefit from continued technical assistance and professional development from the Tennessee Department of Education related to alternate assessment participation criteria, standards-based IEP development, progress monitoring, and evidence-based instructional practices for students with significant cognitive disabilities.