

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#

430 - Humphreys County

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

Reese, Kimberly

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.* *

2.07

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.* *

2.64

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.* *

2.77

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

3.19

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

2.65

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

2.97

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.* *

2.08

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.* *

2.53

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.* *

2.69

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

3.15

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

2.46

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

2.71

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

16. Science Participation Rates 2020-21 *

2.45

17. Science Participation Rates 2021-22 *

2.84

18. Science Participation Rates 2022-23 *

2.96

19. Science Participation Rates 2023-24 *

2.79

20. Science Participation Rates 2024-25 *

3.33

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

2.96

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**. *

12

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

15

Process for Determining Alternate Assessment Eligibility:

Criterion One

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

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

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

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

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

The district provides annual professional development for all special education teachers, related service providers, the school psychologist and administrators regarding the TDOE Alternate Assessment Participation Guide and the Alternate Assessment File Review Rubric. This includes training on the Alternate Assessment Determination tool, the definition of significant cognitive disability, and the requirement that the decision be made based on evidence rather than a specific disability category. Additionally, teams are trained to conduct a specialized review for any student who scored "Advanced" on the previous year's alternate assessment. This training ensures teams understand that an "Advanced" score triggers a deeper discussion to determine if the student's progress suggests they no longer meet the "significant cognitive disability" criteria or if they could successfully access the general assessment with robust Tier 1 accommodations.

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

Determination is based on a comprehensive review of the most recent Psychoeducational Evaluation, including Full Scale IQ (FISQ) or General Abilities indices, Adaptive Behavior Assessment (Vineland-3 or ABAS-3), and curriculum-based measures. We also review progress monitoring data from IEP goals and the student's performance on state/district benchmarks. For students previously scoring "Advanced" on the alternate assessment, the team specifically reviews longitudinal performance data. This includes comparing the student's rate of growth to grade-level peers and analyzing whether the student is beginning to master the Alternate Academic Standards to a degree that indicates they may be ready to attempt the general state standards (TN Academic Standards) with appropriate supports.

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

Adaptive behavior data is used to verify that the student's disability impacts functional life skills (conceptual, social, and

Process for Determining Alternate Assessment Eligibility:

Criterion One

practical domains) to a similar degree as their cognitive impairment. A student must demonstrate deficits in adaptive behavior that require intensive, pervasive levels of support across multiple settings to qualify for the alternate assessment. When a student scores "Advanced," the IEP team re-evaluates the "Practical" and "Conceptual" adaptive domains to see if the student's independence has increased. If adaptive data shows significant improvement in the student's ability to follow complex directions, generalize skills, or work independently, the team uses this as a primary indicator to discuss a potential transition back to the general assessment (TCAP), ensuring the "Least Restrictive Environment" for testing.

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 reviews the student's attendance records, English Language Proficiency status, and comprehensive history of interventions. We verify that the student has received high-quality, systematic instruction aligned to the Tennessee Academic Standards. To rule out instructional disadvantage, the team confirms that the student has been provided with instruction of an appropriate intensity and duration—comparable to their general education peers—delivered by qualified personnel. The team must conclude that despite receiving consistent, research-based interventions and specialized supports, the student's rate of progress remains significantly below grade-level expectations due to the pervasive nature of their cognitive profile rather than a lack of exposure to the curriculum.

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

Longitudinal data including multi-year progress monitoring, historical evaluation data, and Adverse Impact of Disability statements within the IEP. We specifically look for a pattern of performance that shows the student requires extensively modified instruction to access the Tennessee grade level standards. We also analyze the student's response to interventions over time to ensure that the need for alternate assessment is not the result of a change in placements or a temporary situation. When looking for evidence of rigor and alignment, we review lesson plans, IEP goals, work samples and data logs to make sure that they reflect the standards, demonstrate the use of extensively modified material, and the frequency and duration of specialized instruction that is appropriate for their cognitive 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? *

IEP teams evaluate the student's Present Levels of Academic Achievement and Functional Performance (PLAAFP), Accommodations and Modifications, and the Special Education and Related Services sections of the IEP. Data also includes the frequency, type, and intensity of prompts needed (verbal, physical, gestural) to complete tasks. We specifically analyze data from Functional Behavior Assessments (FBAs) or Assistive Technology (AT) evaluations to document the student's reliance on augmentative communication or adaptive equipment. The team looks for a consistent pattern showing that without high-intensity, individualized support, the student is unable to access or make progress within the Alternate Academic Achievement Standards (AA-AAS).

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? *

Teams utilize Least Restrictive Environment (LRE) data, the PLAAFP, the student's goals, accommodations and services sections of the IEP. The determination process involves evaluating the level of modification required for the student to participate in the general curriculum, specifically focusing on whether the student requires content that is significantly reduced in depth, breadth, and complexity. The team reviews whether the student requires a highly structured environment where instruction is delivered in small increments with immediate feedback. For students in modified settings, the team must provide evidence that the student's needs are so extensive that they require direct, individualized instruction that cannot be met through general education differentiation alone, even with supplemental aids.

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 team analyzes whether the student would require specific, intensive supports regardless of the classroom setting. We distinguish between universal supports which are available to all students in a specialized or self-contained setting and the individualized supports documented in the student's IEP. To make this distinction, the team asks questions like: "If this student were placed in a general education setting with their current IEP supports, would they still require this specific level of one-on-one prompting or AT to communicate or demonstrate knowledge?" The focus is on the student-specific necessity of the support (e.g., a dedicated communication device or hand-over-hand assistance) rather than environmental features like a low student-to-teacher ratio or a visual schedule used by the whole class.

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.

Our LEA's alternate assessment population consists of 43.48% Intellectual Disability and 39.13% Autism, which aligns with typical expectations for students with significant cognitive disabilities. However, a comparison of our participant demographics against district and statewide averages reveals the following areas of disproportionality:

Subgroup	LEA Alt. Assess. Rate	District-Wide Overall Rate	Statewide Alt. Assess. Rate
Status Economically Disadvantaged	43.47%	26.00%	37.43%
Disproportionate Black/African American	10.87%	3.39%	34.62%
Disproportionate Male	76.08%	51.00%	67%

Disproportionate Our plan for reducing disproportionality is to address these gaps to ensure that the "1% cap" is maintained with integrity. The LEA will implement targeted file audits, evaluate our pre-referral process, provide bias awareness training, and conduct some longitudinal performance tracking of students who fall within the disproportionate subgroup. For targeted file reviews, we will specifically conduct an intensive review of files for students in the Economically Disadvantaged and Black/African American subgroups. The review will utilize the TDOE Alternate Assessment File Review Rubric to ensure that high-intensity support needs are due to a significant cognitive disability and not correlated with socioeconomic factors or a lack of tiered instructional intervention. The district will provide professional development for IEP teams focused on identifying and mitigating cultural and socioeconomic biases during the initial eligibility process. This includes training on the distinction between a learning gap due to environmental factors and a significant cognitive disability. We will audit our RTI² (Response to Instruction and Intervention) data for these subgroups to ensure that students are receiving high-quality, research-based Tier 2 and Tier 3 interventions before being considered for a disability category (such as Intellectual Disability) that frequently leads to alternate assessment placement. The LEA will track the "Advanced" scoring students within these disproportionate subgroups to prioritize them for potential transition back to the general assessment with accommodations, ensuring they are tested in the Least Restrictive Environment.

*(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 provided with a guidance document regarding Alternate Assessment during the IEP meeting. Teams explicitly discuss that the alternate assessment is based on Alternate Academic Achievement Standards rather than the standard Tennessee Academic Standards. The team provides a clear explanation that participating in the alternate assessment typically leads to an Alternate Academic Diploma rather than a Traditional High School Diploma. This discussion includes the potential post-secondary implications, ensuring parents understand that while this path provides a state-recognized diploma, it may impact certain college or military enlistment requirements. We document this "Informed Consent" within the IEP or Prior Written Notice to verify that parents understand the long-term educational trajectory.

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

Parents are treated as equal, active members of the IEP team. They provide vital input on the student's functional abilities and Adaptive Behavior outside of the school setting, which is critical for Criterion 1. Their concerns, observations, and goals for the student's independence are documented in the Parent Input section of the IEP and considered alongside school-based data. To ensure meaningful participation, teams walk parents through the Determination of Eligibility for Alternate Assessment Participation during the meeting. This allows parents to see the data-driven path used to determine eligibility and ensures they are involved in the "ruling out" of instructional or English language disadvantages.

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? *The Alternate Assessment Participation form is a mandatory component of the annual IEP review process. TNPulse requires teams to re-evaluate and complete the participation criteria section every year; it does not "carry over" automatically. This annual review includes an analysis of the student's most recent performance data. As discussed in Criterion 1, teams specifically flag students who scored "Advanced" on the previous year's assessment to lead a robust discussion on whether the student remains eligible or if they should transition back to the general assessment (TCAP). This ensures that no student is "locked into" an alternate track and that the Least Restrictive Environment (LRE) for testing is always prioritized based on current growth.

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 ensures that all students participating in the alternate assessment receive instruction aligned to the Tennessee Academic Standards through the Alternate Academic Achievement Standards (AA-AAS). Our procedures require that IEP goals are not merely "functional," but are directly linked to grade-level AA-AAS's. This ensures that the student is engaged in the same rigorous subject matter as their general education peers, modified to an appropriate level of complexity. In alignment with the *Endrew F.* "reasonably calculated" standard, our IEP teams are trained to move beyond de minimis (minimal) progress. Teams work to develop annual goals that are "ambitious" and "challenging" in light of the student's circumstances. We implement a policy of quarterly progress monitoring using curriculum-based measures (CBMs) and rubric-based tracking. If a student is not on track to meet an ambitious goal, the IEP team is required to reconvene, analyze the instructional delivery, and adjust strategies to ensure the student makes appropriate progress. The district provides ongoing training for teachers to ensure that instruction is intensive and scientifically based, providing the best opportunity for academic gains. To ensure high levels of engagement, the LEA utilizes Universal Design for Learning (UDL) principles and practices that include assistive technology and evidence of mastery. We ensure that every student on the alternate track has a functional communication system to express what they know. We also maintain digital and portfolio information for students on the alternate assessment track to assure that students are not just present, but are actively working on mastering specific standards-aligned skills. LEA Assurances: The district conducts internal compliance audits of IEPs for students on the alternate assessment to verify that the Adverse impact statement justifies the need for modified standards and that the resulting goals are sufficiently challenging. By focusing on the "whole child" and using multi-year longitudinal data, the LEA ensures that every student—regardless of the severity of their disability—is provided an education that is both ambitious and calculated to lead to meaningful academic achievement.

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. *

Any additional resources that could be provided to help parents better understand the long-term implications of students participating in the Alternate Assessment especially at a very young age. We have made a lot of progress with teachers and administrators understanding the implications, however, we try to help the parents understand but we often have parents demanding that their child participate. We have those hard conversations, but additional resources would be helpful.