

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#

480 - Lake County

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

Nikki Springer

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.* *

3.27

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.* *

3.32

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.* *

3.49

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

3.36

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

3

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

3.99

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.* *

3.24

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.* *

3.36

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.* *

3.39

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

4.1

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

3

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

3.58

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

16. Science Participation Rates 2020-21 *

3.25

17. Science Participation Rates 2021-22 *

3.39

18. Science Participation Rates 2022-23 *

2.95

19. Science Participation Rates 2023-24 *

4.1

20. Science Participation Rates 2024-25 *

3

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

4.24

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? *

IEP teams are informed of the criteria and expectations for alternate assessment participation through district training, ongoing support from the special education department, and review of the required eligibility criteria during the IEP process. At the beginning of each year, special education teachers, case managers, school psychologists, and administrators are trained on Tennessee's alternate assessment participation requirements so they understand that the alternate assessment is only for students with the most significant cognitive disabilities. Teams are expected to review multiple sources of data when making this decision, including evaluation results, adaptive behavior data, classroom performance, and progress monitoring information. During the IEP meeting, the team reviews the criteria and discusses whether the student's needs meet the expectations for alternate assessment participation following the Determination of Eligibility for Alternate Assessment Participation guidance document/checklist. This helps ensure that decisions are based on the student's individual needs and not simply on disability category, placement, or low academic performance. The special education department provides support to teams throughout the year by answering questions, reviewing eligibility decisions, and helping ensure the criteria are being applied consistently across the district. We also review alternate assessment participation during IEP monitoring to make sure teams are documenting the data used to make the decision and that the rationale for participation is clear. By providing training, ongoing guidance, and district oversight, we work to ensure that IEP teams understand the criteria for alternate assessment participation and are making appropriate, data-based decisions for students.

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

To determine whether a student meets the criteria for alternate assessment participation, the IEP team reviews multiple sources of data to get a complete picture of the student's cognitive, academic, and functional needs. This includes cognitive assessment results, adaptive behavior data, academic performance, progress monitoring data, classroom observations, and input from teachers, parent input, and related service providers. The team reviews cognitive assessment data to determine whether the student demonstrates significant deficits in intellectual functioning.

Process for Determining Alternate Assessment Eligibility:

Criterion One

Adaptive behavior data is also reviewed to determine how the student is functioning in everyday activities such as communication, social skills, and independent living. In addition, the team looks at classroom performance, progress toward IEP goals, and progress monitoring data to determine the level of support the student needs to access instruction and make progress on the alternate academic standards. Teacher input and classroom observations are also important parts of the decision-making process. These provide information about how the student performs in the instructional setting, the amount of direct support needed, and whether the student requires extensive modifications and repeated instruction in order to learn new skills. By reviewing all of these data sources together, the IEP team is able to make an informed, data-based decision about whether the student has the most significant cognitive disability and requires the alternate assessment. This helps ensure that the decision is based on the student's individual needs and is aligned with state criteria.

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

Adaptive behavior data is an important part of the decision-making process because it helps the IEP team understand how the student functions in everyday environments beyond academic performance alone. The team reviews adaptive behavior assessments, evaluation reports, teacher input, and parent input to determine the student's level of independence in areas such as communication, social skills, daily living skills, and functional behavior. This information is considered along with cognitive and academic data to determine whether the student demonstrates significant deficits that impact functioning across settings. The team looks at whether the student requires substantial supports to complete daily tasks, participate in instruction, and develop functional skills. These deficits must be significant enough to show that the student has the most significant cognitive disability and requires instruction aligned to the alternate academic standards. During the IEP meeting, adaptive behavior data is reviewed as part of the overall eligibility discussion to ensure the team is looking at the whole child and not relying on academic scores alone. By including adaptive behavior data in the decision-making process, the IEP team is able to make a more informed determination about whether alternate assessment participation is appropriate based on the student's individual needs and functioning.

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 the result of a significant cognitive disability, rather than an instructional disadvantage, by reviewing multiple sources of data and looking at the student's response to appropriate instruction over time. The team reviews evaluation results, classroom performance, progress monitoring data, intervention records, and teacher input to determine whether the student's academic struggles are consistent with a significant cognitive disability and not the result of limited instruction, excessive absences, or lack of access to grade-level content. The team also reviews the student's instructional history to confirm that the student has had access to standards-based instruction, appropriate interventions, and needed supports. This helps ensure that low academic performance is not being caused by gaps in instruction or lack of opportunity to learn. If the student has received appropriate instruction and continues to demonstrate significant and ongoing deficits in cognitive functioning, adaptive behavior, and academic performance, the team can more confidently determine that the student meets the criteria for alternate assessment participation. Teacher input, classroom observations, and progress toward IEP goals are also reviewed to determine the level of support the student needs to learn and retain skills. The team looks for evidence that the student requires extensive direct instruction, repeated practice, and substantial supports even when provided with appropriate instruction. This information, along with formal evaluation data, helps the team determine that the student's needs are related to a significant cognitive disability rather than instructional disadvantage. By reviewing instructional history and student response to instruction along with cognitive and adaptive behavior data, the IEP team is able to make an informed decision that is based on the student's disability-related needs and aligned with state expectations.

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

To ensure the student has been provided access to grade-level, standards-aligned instruction, the IEP team reviews evidence that reflects both the instruction provided and the student's access to that instruction over time. This includes lesson plans aligned to Tennessee standards, classroom assessments, work samples, progress monitoring data, IEP goals, and documentation of accommodations, modifications, and specially designed instruction provided through the IEP. The team also looks at the student's schedule and service delivery to confirm the student is receiving instruction in core academic areas and that the instruction is being delivered with appropriate intensity, frequency, and duration based on their needs. Teacher input and classroom observations are used to verify what instruction actually looks like day to day and whether the student is able to access and participate in grade-level content with supports. To make the determination, the IEP team uses a combination of academic data, progress toward IEP goals, curriculum-based measures, benchmark assessments, and response to instruction and interventions. This helps the team determine whether the student has truly had access to grade-

Process for Determining Alternate Assessment Eligibility:

Criterion Two

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level, standards-aligned instruction and how the student responds when that instruction and support are in place. By looking at all of this information together, the IEP team can confirm that the student has been provided appropriate access to standards-based instruction before considering eligibility for alternate assessment.

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? *

To support the determination that a student requires extensive, direct, individualized instruction and substantial supports to make measurable gains in the grade and age-appropriate curriculum, the IEP team reviews multiple sources of data that show both the level of need and the level of support required for the student to make progress. This includes formal evaluation data (cognitive and adaptive behavior assessments), academic achievement data, progress monitoring, curriculum-based assessments, classroom work samples, and IEP goal progress. The team looks closely at how the student performs when instruction is provided with accommodations and specially designed instruction, and whether progress is only made with repeated instruction, high levels of prompting, and intensive supports. Teacher input and classroom observations are also used to document how the student engages with instruction on a daily basis, including the amount of modeling, repetition, visual supports, and one-on-one assistance needed for the student to access and retain skills. Intervention data and response to instruction are reviewed to determine whether the student makes consistent progress over time or requires ongoing, highly individualized instruction to maintain or generalize skills. By reviewing all of this data together, the IEP team is able to determine whether the student's instructional needs are significant enough to require extensive direct instruction and substantial supports in order to make measurable gains in the grade-level or alternate academic 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 by reviewing multiple sources of data and matching those needs to appropriate services, accommodations, and placement options. The team looks at evaluation results, including cognitive and adaptive behavior data, academic achievement, progress monitoring, classroom performance, and teacher input to identify what the student needs in order to access instruction and make progress on IEP goals. The team also reviews how the student performs in different settings and with different levels of support, including general education with accommodations, small group instruction, and individualized instruction. This helps the team determine the intensity of supports needed, such as direct instruction, repetition, visual supports, prompting, assistive technology, and frequent progress monitoring. Intervention data and response to instruction are used to determine whether the student is able to make progress with less support or requires more intensive, specialized instruction to maintain and generalize skills. For students whose Least Restrictive Environment (LRE) includes a highly modified special education setting for all or part of the day, the IEP team bases that decision on documented evidence that the student requires a structured, specialized instructional environment in order to access instruction and make meaningful progress. This includes data showing the student needs significant modifications to grade-level content, a reduced pace of instruction, and a higher level of adult support than what can typically be provided in the general education setting. The team ensures that placement decisions are not made based on disability category or convenience, but instead are driven by data and the student's individual needs. The goal is always to provide the appropriate level of support in the least restrictive environment where the student can make meaningful progress, while still ensuring access to appropriate instruction and services.

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

Process for Determining Alternate Assessment Eligibility:

Criterion Three

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instructional environment? *

The IEP team distinguishes between supports required by the student's disability and those that are part of the general instructional environment by examining what the student needs to access instruction and make progress, compared with what is available to all students as part of high-quality instruction. The team first reviews evaluation data, classroom performance, progress monitoring, and teacher input to identify what level of support the student requires on an individual basis. This includes assessing whether the student needs consistent adult support, repeated and individualized instruction, specialized strategies, assistive technology, or significant modifications to content to learn and retain skills. The team then considers the supports already available within the instructional environment, such as universal design for learning strategies, general education interventions, small-group instruction, and classroom-wide accommodations. These supports are considered part of strong core instruction and are not, by themselves, indicators of a need for special education services. The key factor the IEP team uses is whether the student can make meaningful progress with only general instructional supports or whether the student requires individualized, specially designed instruction and more intensive supports that go beyond what is provided to all students. If the student only makes progress when supports are significantly intensified, individualized, and consistently implemented, those supports are considered disability-related and included in the IEP. By reviewing both the instructional supports available to all students and the student's documented response to those supports, the IEP team can determine what is needed due to the student's disability versus what is part of the general educational 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.

Lake County Schools had higher alternate assessment participation than the state in 2024–25, with rates of 3.99% in ELA, 3.58% in Math, and 4.24% in Science. As the letter states, “The alternate assessment participation rates for your LEA are as follows: · ELA: 3.99% · Mathematics: 3.58% · Science: 4.24%.” Most of the students who participated were those with Intellectual Disability (42.11%) or Multiple Disabilities (21.05%). That generally lines up with statewide patterns, although the district has a higher percentage of students with Multiple Disabilities than the state overall. A few students from categories like Emotional Disturbance, Specific Learning Disability, and Functional Delay also participated, which is something the district continues to review carefully. The demographic data show some noticeable differences compared to statewide patterns. Economically disadvantaged students made up 68.42% of the district’s alternate assessment participants, while the statewide alternate assessment population includes 37.43% economically disadvantaged students. Black students also made up a larger share of the district’s participants, 57.89%, compared to 34.62% statewide. Male students participated at a slightly higher rate as well. These differences suggest that some groups are represented more heavily in the alternate assessment than expected, and the district is committed to understanding and addressing those patterns. The district continues to complete comprehensive evaluations for every student who participated in the alternate assessment during the 2024–2025 school year. Through those evaluations, it was determined that some students did not meet the criteria for alternate assessment participation and will be supported in transitioning to the general assessment with appropriate accommodations and instructional supports. The review process also confirmed that some students continue to meet the criteria and will remain on the alternate assessment based on current evaluation data and individual needs. Moving forward, the district will continue reviewing its participation data each year and making sure IEP teams have the training and tools they need to make consistent decisions. The district is also working to expand the use of accommodations and supports so that students who can participate in the general assessment are given that opportunity. By keeping a close eye on demographic patterns and reinforcing clear, criteria-based decision-making, the district aims to reduce any remaining disproportionality and ensure that every student is placed in the assessment that best fits their needs.

*(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 about the alternate assessment in a straightforward manner. When a student is being considered for it, the IEP team meets with the family to explain what the state requires, what "significant cognitive disability" means, and how the team decided the student might qualify. Everything is explained in plain language so parents don't feel overwhelmed or confused. The team also explains what the alternate assessment means for the student's future. Parents are told directly that students who take alternate assessments are much less likely to earn a traditional diploma because the content is so modified. The goal is to make sure families really understand the long-term impact before agreeing to anything. Parents also get written information so that they can look it over later. During the meeting, the staff reviews the documents with them and checks in often to ensure everything makes sense. Families are encouraged to ask questions, share concerns, and take their time with the decision. Most importantly, parents are reminded that they're full members of the IEP team. The district makes it clear that alternate assessment decisions are based solely on the student's cognitive needs, not behavior, grades, or other outside factors. By having open conversations, providing clear explanations, and offering written resources, the district ensures parents are fully informed before any decision is made.

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

Parents are included as full and equal members of the IEP team in all decision-making related to eligibility, placement, services, and participation in alternate assessment. They are invited to all IEP meetings and are given sufficient notice to attend and participate meaningfully in the discussion. During the IEP meeting, parents are provided with all relevant data being considered, including evaluation results, classroom performance, progress monitoring, adaptive behavior information, and teacher input. The team reviews this information together, and parents are given the opportunity to ask questions, share input about their child's strengths and needs, and provide insight from the home environment that may not be reflected in school data. For decisions related to alternate assessment participation, parents are specifically included in discussions of eligibility criteria and the data used to determine whether their child meets the participation requirements. The team explains the implications of participation in alternate assessment, including how instruction is delivered and how student progress is measured. Parent input is documented in the IEP, and their perspective is considered alongside all other data when the team makes its decision. If there is disagreement, the team continues discussion and may reconvene if additional data or clarification is needed. Overall, parents are treated as active partners in the decision-making process, and their input is essential to ensuring that IEP decisions are individualized and data-driven.

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 district has a process in place to ensure that participation in the alternate assessment is reviewed every year during the annual IEP meeting and that any possible transition to the general assessment is fully discussed by the IEP team. Each year the team reviews current data including evaluation results, classroom performance, progress monitoring, adaptive behavior information, and teacher input to determine whether the student continues to meet criteria for alternate assessment participation. The team specifically discusses whether the student still has a significant cognitive disability or whether they may be able to participate in the general assessment with accommodations. This is a required part of the annual IEP process, and assessment participation is always an explicit discussion point. Parents are included in this discussion and are provided all relevant information so they can participate in the decision. If data

shows the student may no longer meet criteria for the alternate assessment, the team can reconvene at any time to review updated information and consider a change to the general assessment. District staff also review IEP documentation to ensure that annual discussions are happening and that decisions are based on current data and properly documented. This ensures that assessment participation is reviewed regularly and adjusted based on the student's needs.

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.*Our LEA has policies and practices in place to ensure that all students, including those on the alternate assessment, receive standards-based instruction that is appropriate to their needs and allows them to make meaningful academic progress. All students receive instruction aligned to Tennessee academic standards or the Tennessee Alternate Academic Standards based on their IEP. IEP teams ensure that instruction includes appropriate accommodations, modifications, and specially designed instruction so students can access the curriculum and work toward measurable goals. For students on the alternate assessment, instruction is based on the alternate academic standards and is adjusted based on student performance and progress data. Teachers use ongoing progress monitoring, classroom assessments, and IEP goal data to track student progress and adjust instruction when needed. The district monitors student progress through IEP reviews, progress reports, and ongoing data review to ensure students are making appropriate gains. Teachers and case managers are expected to update instruction based on student needs, and district staff review IEPs and assessment data to ensure expectations are being met. Professional development is also provided to support staff in using data and delivering standards-based instruction. These practices ensure students are receiving appropriate instruction and making progress based on their individual circumstances.

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. * None at this time.