

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#

60 - Bradley County

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

Hayes, Heather

3. Identify your role within the LEA. Special Education Director

- a. Special Education Director
- b. Special Education Coordinator
- c. Other

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

4. **ELA Participation Rates 2020-21** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA. **

1.42

5. **ELA Participation Rates 2021-22** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA. **

1.28

6. **ELA Participation Rates 2022-23** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA. **

1.28

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

1.21

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

1.11

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

1.19

Math Participation Rates for School Years 2020-21 through

10. **Math Participation Rates 2020-21** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA.* *

1.4

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.* *

1.27

12. **Math Participation Rates 2022-23** *Note: Prior to the 2023-24 SY, Tennessee participated in the Multi-State Alternate Assessment (MSAA) in English language arts (ELA) and mathematics. Beginning in the 2023-24 SY, the Dynamic Learning Maps (OLM) embedded alternate assessment replaced the MSAA.* *

1.28

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

1.22

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

0.98

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

1.19

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

16. Science Participation Rates 2020-21 *

1.44

17. Science Participation Rates 2021-22 *

1.4

18. Science Participation Rates 2022-23 *

1.16

19. Science Participation Rates 2023-24 *

1.25

20. Science Participation Rates 2024-25 *

1.28

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

1.19

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**. *

3

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

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Process for Determining Alternate Assessment Eligibility:

Criterion One

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

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

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

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

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

To ensure accurate eligibility decisions, the IEP team thoroughly reviews multiple data sources during the eligibility meeting. This includes analyzing historical and current IQ scores with confidence intervals, using the most appropriate and valid assessments. The team also considers language and cultural differences to ensure fairness and accuracy in the evaluation process. Adaptive behavior data is collected and reviewed across multiple environments to ensure triangulation. The data must demonstrate functioning at least two standard deviations below the mean. To validate the findings, separate observational forms are completed for behavior, and the information is cross-checked to ensure consistency between observational data and quantified results. All criterion factors are systematically reviewed during the eligibility meeting. The school psychologist documents the IQ and adaptive behavior scores in the psychoeducational report. Qualified staff further verify these scores through observations conducted in multiple settings, ensuring a comprehensive and accurate representation of the student's abilities and needs. The IEP team reviews student progress and data annually to determine whether the student continues to meet the criteria for participating in the alternate assessment.

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

To ensure accurate eligibility decisions, the IEP team thoroughly reviews multiple data sources during the eligibility meeting. This includes analyzing historical and current IQ scores with confidence intervals, using the most appropriate and valid assessments. The team also considers language and cultural differences to ensure fairness and accuracy in the evaluation process. Adaptive behavior data is collected and reviewed across multiple environments to ensure triangulation. The data must demonstrate functioning at least two standard deviations below the mean. To validate the findings, separate observational forms are completed for behavior, and the information is cross-checked to ensure consistency between observational data and quantified results. All criterion factors are systematically reviewed during the eligibility meeting. The school psychologist documents the IQ and adaptive behavior scores in the psychoeducational report. Qualified staff further verify these scores through observations conducted in multiple settings, ensuring a comprehensive and accurate representation of the student's abilities and needs. The IEP team reviews student progress and data annually to determine whether the student continues to meet the criteria for

Process for Determining Alternate Assessment Eligibility:

Criterion One

participating in the alternate assessment.

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

The team reviews current adaptive behavior measures, evaluation reports, teacher input, parent input, and observational data to understand how the student functions independently across school and home environments. Specifically, adaptive behavior data provides information regarding the student's performance in areas such as communication, self-care, social interaction, daily living skills, safety awareness, functional academics, and the ability to initiate and complete tasks. The district considers whether deficits in these areas are significant and consistent over time, and whether they substantially impact the student's ability to access and progress in the general curriculum without extensive supports.

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? *

In an effort to minimize instructional disadvantage, Bradley County prioritizes placing the lowest performing students in classrooms led by the most highly qualified teachers, as demonstrated by teacher evaluations. This approach to class placement ensures that students with the greatest needs have the best chance to experience the highest level of rigor, intensity and duration of instruction while engaged with standards-based learning. Bradley County also adopts a "whole child" approach, thoroughly assessing all of a child's needs and characteristics to identify and address any factors that may be impacting learning in addition to a significant cognitive disability and therefore need to be addressed. Bradley County uses these tools to make informed decisions about student instruction, ensuring that students taking the alternate assessment are exposed to the same rigorous state content standards as their peers, thereby eliminating instructional disadvantage as a factor.

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

Teacher level of effectiveness data and administrator observation results are considered as part of the classroom placement process to help ensure highly effective educators are strategically assigned to support students with the greatest academic and instructional needs. Regular fidelity checks are conducted to monitor the implementation of accommodations, behavior intervention plans, and other required supports, with targeted training and coaching provided when areas for improvement are identified. Additionally, scheduling decisions remain flexible and responsive to individual student needs in order to maximize access to and participation in the general education curriculum to the greatest extent appropriate. Since high fidelity in program implementation has been shown to improve student outcomes, Bradley County regularly conducts fidelity checks on teachers administering selected programs to students. This ensures that all components and procedures of the learning programs are executed exactly as intended by the researchers, leading to better student outcomes. In addition, deliberate scheduling in Bradley County guarantees that students get the necessary instruction time in all core subjects, ensuring they are only removed from the general education classroom during periods when core subjects are not being taught, so as to minimize disruption to their learning.

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 begins with a comprehensive evaluation that assesses the student's IQ, Achievement, strengths, needs, and present levels of performance across domains such as academics, behavior, communication, social-emotional skills, and adaptive skills. Observations in various settings help determine how the student performs in different environments and how much support is needed to achieve success. The student's progress toward Individualized Education Program (IEP) goals is reviewed to determine whether current interventions and supports are effective given documented attempts for multiple supports..

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 identify the specific barriers that prevent the student from participating successfully in the least restrictive environments (e.g., sensory needs, behavioral challenges, significant skill gaps). Specific supports are discussed that are required for the student to overcome barriers, such as: Individualized instruction,, AAC devices, Behavioral interventions, One-on-one assistance, etc.

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? *

To ensure the supports needs are separate from those available in the environment, the support is evaluated to determine if it directly enables the student to meet their IEP goals. Teams trial certain supports in different environments to determine if they are intrinsic to the student's success or beneficial because they are part of the 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.

Bradley County Schools does not show a disproportionality in race and ethnicity as the proportionality is very similar to the entire student body for the district even though there is a stark difference in the White and African American data with the state. However, in reference to the state percentage for student with intellectual disability, BCS percentage is 11% higher. A review of these students will be conducted in regards to the decision making process for the alt selection to ensure all 3 criterion were used to make the determination.

*(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 the development of the student's IEP, parents are informed of the eligibility criteria for alternate assessments with an explanation as to the level of significant modifications to the general education curriculum needed for the child. It is explained that alternate assessment is applied to students with the most significant cognitive disabilities. Parents are clearly informed that participation in the alt could significantly limit their child's ability to receive a traditional diploma, the graduation criteria required may be different compared to those taking the general assessments, and the long term implications of participation in their postsecondary opportunities.

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

The IEP team discusses the student's specific and unique abilities and needs, then determines as a team if the alt assessment is appropriate. Parent concerns for the implications are discussed among the team before a decision is made.

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 decision is reviewed annually as an IEP team to determine if the alt remains the appropriate assessment for the student. Parents are given a list of diploma types and requirements that are needed for each.

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 district ensures all students with disabilities have access to Tennessee standards through standards-aligned core instruction and curriculum materials regardless of placement or assessment option, supplementary aids and services, accommodations, and specially designed instruction as determined by the IEP team. Progress toward goals is monitored regularly, reported to parents, and used to inform instructional adjustments. To support high-quality instruction, Bradley County Schools utilizes multiple forms of data, including universal screeners, benchmark assessments, classroom data, progress monitoring, state assessments, and IEP goal data. School teams review student progress routinely to identify barriers to achievement, evaluate the effectiveness of interventions, and determine whether changes in instructional supports are needed. Students who are not demonstrating expected progress receive intensified interventions, additional supports, or reconvening of the IEP team as appropriate. The LEA also prioritizes the assignment and development of effective educators. Teacher effectiveness data, observation feedback, and student needs are considered when making staffing and classroom placement decisions. Ongoing professional development is provided in the areas of standards-based instruction, foundational skills training, specially designed instruction, behavior supports, accommodations, inclusive practices, progress monitoring, and legal compliance requirements. To ensure fidelity of implementation, administrators and instructional leaders conduct classroom observations and compliance monitoring related to accommodations, behavior intervention plans, and inclusion best practices. When concerns are identified additional training is provided. The district further promotes access to the least restrictive environment by using flexible scheduling, collaborative teaching models, intervention blocks, and individualized service delivery structures that maximize participation in the general education curriculum.

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. * The district is currently struggling with high school logistics. Having further guidance and training on comp and alt codes as well implications for use such as the impact of a comp code prior to occupational diploma determination; sample schedules for students who utilize greater than 4 years to receive a regular ed diploma given state policies and criteria regarding regular ed diplomas. Having further clarity in this area would help us make a more informed decision with many solution paths leading to fewer alt diploma decisions.