

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#

630 - Clarksville-Montgomery County Schools

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

Allen, Cassie

3. Identify your role within the LEA. Special Populations Data Specialist

- 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.* *

1.22

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.* *

1.43

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

1.55

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

1.5

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

1.47

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.* *

1.42

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.* *

1.23

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.* *

1.43

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

1.55

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

1.34

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

1.47

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 *

1.32

18. Science Participation Rates 2022-23 *

1.33

19. Science Participation Rates 2023-24 *

1.55

20. Science Participation Rates 2024-25 *

1.58

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

1.93

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**. *

49

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

24

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 through the Tennessee Department of Education (TDOE) Alternate Assessment Guidance, which is embedded within the CMCSS manual. This resource outlines the required criteria for participation in alternate assessments and ensures teams have a clear, standardized framework to support appropriate and consistent decision-making. Ongoing collaboration with school psychologists and district support further reinforces understanding and application of these expectations.

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

IEP teams use multiple sources of data to make determination decisions, including comprehensive evaluation data provided by school psychologists. This includes cognitive assessment data and measures of teacher and parent input on adaptive behavior. In addition, teams consider structured observations, performance-based checklists, and data reflecting the student's academic and functional performance. Together, these data sources provide a well-rounded understanding of the student's needs and abilities.

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

Adaptive behavior data is incorporated as a key component of the comprehensive evaluation conducted by school psychologists. This data helps IEP teams understand how a student functions in daily life across settings, including communication, social, and independent living skills. Teams use this information, alongside cognitive and academic data, to determine the level of support the student requires and whether the student's functioning aligns with criteria for alternate assessment participation. This ensures decisions are based on both academic performance and real-world functional abilities.

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 through a comprehensive review of multiple data sources and instructional factors. The team evaluates the student's access to high-quality, standards-based instruction, including the provision of Specially Designed Instruction (SDI) aligned to grade-level expectations. Observations of the student's classroom engagement and responsiveness to specialized instruction are conducted to determine whether the student is able to meaningfully access the curriculum when appropriate supports are in place. Additionally, the team reviews longitudinal data to assess patterns of learning and growth over time. This systematic and evidence-based process ensures that lack of progress is not the result of inadequate instruction, but rather reflective of the student's cognitive and adaptive functioning.

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

The IEP team utilizes a comprehensive set of multi-source data to make informed determinations. This includes adaptive behavior assessments, measures of functional performance, progress monitoring data, and longitudinal data reflecting the student's growth over time. Teams also analyze both formative and summative assessment results, as well as systematic reviews of present levels of academic and functional performance. In addition, observational data regarding classroom engagement and responsiveness to specialized instruction are considered. Together, these data sources ensure that decisions are grounded in a thorough understanding of the student's needs and are both evidence-based and instructionally appropriate. 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.

Process for Determining Alternate Assessment Eligibility: Criterion Three

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

Criterion Three: The student requires extensive direct individualized instruction and substantial supports to achieve measurable gains in the grade- and age-appropriate curriculum.

In the questions below, describe the process used to determine that the student requires extensive, direct individualized instruction and substantial supports.

29. What data are used to support this determination? *

IEP teams use a comprehensive set of multi-source data to support determination decisions. This includes adaptive behavior assessments, measures of functional performance, and screening data, as well as both formative and summative assessment results. Progress monitoring data and longitudinal records of student growth are reviewed to identify trends and responsiveness to instruction over time. Teams also analyze present levels of academic and functional performance, along with observational data related to classroom engagement and response to high-quality instruction and Specially Designed Instruction (SDI). Evaluation results are integrated with ongoing performance data to ensure a complete understanding of the student's needs. The use of the IAIEP Self-Assessment Tool rubric further ensures that all data are systematically reviewed and applied in a consistent, evidence-based manner.

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 through a data-driven analysis of the student's individual strengths and needs, as identified in present levels of performance and comprehensive evaluation data. Teams align supports directly to measurable annual goals and ensure that services are designed to provide access to grade-level content, including alternate standards when appropriate. The District's focus on Instructionally Appropriate IEPs (IAIEPs) ensures that supports are individualized, clearly defined, and aligned with Least Restrictive Environment (LRE) requirements. For students in highly modified special education settings, teams carefully consider the intensity, frequency, and duration of supports needed to promote meaningful progress and increased access to general education opportunities. Specially Designed Instruction (SDI) serves as the foundation for determining supports, with consideration given to the student's responsiveness to prior interventions and instruction. Collaboration among general educators, special educators, and related service providers ensures that supports are comprehensive and address both academic and functional needs. Ongoing progress monitoring and monthly data reviews allow teams to adjust support as needed to ensure continued progress. The Dynamic Learning Maps (DLM) system, delivered through the Kite platform, measures student mastery using Essential Elements, which are alternative versions of grade-level standards for students with significant cognitive disabilities. Skills are organized in a learning map that shows how they build on one another, and each skill is assessed across linkage levels that represent increasing complexity. Students complete short, adaptive testlets, and mastery is determined based on consistent performance, resulting in a profile of specific skills mastered rather than a single score. This approach guides instruction by providing ongoing, real-time data about where a student is in their learning progression. Teachers can identify missing prerequisite skills, target the next steps for instruction, and align teaching with IEP goals. As a result, DLM supports a mastery-based, individualized approach where instruction is continuously adjusted to meet each student's needs.

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? *

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.

IEP teams distinguish between disability-related supports and those available within the general instructional environment by analyzing the student's individual response to high-quality, standards-based instruction. Teams review data to determine whether the student can access and make progress in the general education curriculum using universally available supports alone, or if the student requires additional, individualized interventions due to the impact of their disability. This determination is supported by examining progress monitoring data, classroom observations, and responsiveness to instruction, including Specially Designed Instruction (SDI). If a student demonstrates limited progress despite access to general education supports and appropriate instruction, the team identifies the need for more intensive, individualized supports that are directly linked to the student's disability-related needs. The use of IAIEPs ensures that all supports are explicitly tied to present levels of performance and measurable goals, rather than to general classroom practices. This systematic, data-based approach ensures that supports included in the IEP are necessary, individualized, and distinct from those routinely available to all students.

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.

Clarksville Montgomery County Schools has the unique opportunity to serve military dependents. Fort Campbell is a preferred post for families with children with exceptional needs due to its proximity to Vanderbilt. This increases the number of students with disabilities served by CMCSS which also impacts the number of students who qualify for alternative instruction and state assessment. During the 2025-2026 school year, the CMCSS Special Populations Data Specialist ran the data quarterly and analyzed for over-identifying areas. These reviews focus on identifying students with disabilities, including those identified with specific impairments such as Autism and Intellectual Disability. A key component of this initiative is analyzing the data to address and mitigate the over-identification of students based on race. Current district data is outlined below: Overrepresentation: ○ Black or African American students: Comprising 34.62% of the state's alternate assessment participation, they represent a higher proportion in Montgomery County at 41.77%. Underrepresentation: ○ White students: While making up 49.30% of the state's alternate assessment participation, they represent only 38.73% in Montgomery County. Proportional Representation: ○ American Indian (0.44% state vs. 0.51% Montgomery County) populations are consistent with state distributions. The team is committed to ensuring that identification practices are equitable, data-driven, and aligned with federal and state guidelines. By conducting regular reviews, the district aims to foster accurate, fair, and unbiased identification of students with disabilities while supporting the needs of all learners.

*(For example, if the LEA student population is evenly distributed among White, Black, and Hispanic students, the alternate assessment participation data should reflect a similar distribution across those groups.) **

Informed Parent Participation

Students who participate in alternate assessments are significantly less likely to earn a traditional diploma due to the highly modified content and potential for lower expectations.

In the questions below, describe the processes and practices used to ensure parents are fully informed of the eligibility requirements and implications of alternate assessment participation.

33. How are parents informed of the eligibility criteria and implications of participation? *

Parents are informed of the eligibility criteria and implications of alternate assessment participation during IEP team meetings, where they are actively invited and encouraged to participate. During these meetings, the team carefully reviews established criteria and discusses the student's cognitive and adaptive assessment results, as documented by the school psychologist in TNPULSE. This ensures that parents understand both the requirements for eligibility and the impact that participation in alternate assessments may have on their child's educational program.

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

Parents are integral members of the IEP team and are actively included in all discussions and decisions regarding alternate assessment participation. They participate in reviewing evaluation data, including cognitive and adaptive behavior results, as well as present levels of performance and student needs. The IEP team collaborates with parents to ensure their input is considered when determining whether alternate assessment is the most appropriate option for the student, supporting a shared, informed decision-making process.

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 ensures that alternate assessment participation is reviewed at least annually through the required IEP review process. During each annual IEP meeting, teams revisit eligibility criteria, review updated cognitive, adaptive, and performance data, and discuss the student's progress and current needs. Documentation within TNPULSE, including the "Eligibility for Alternate Assessment" section, supports this review and ensures that decisions are current and data-informed. Ongoing professional learning, regular collaboration through Lead Teacher and Principal meetings, and monthly Special Education Coordinator meetings further reinforce expectations for consistent, thorough review practices across all schools. 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 appropriate progress 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.

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.*

Clarksville-Montgomery County Schools (CMCSS) maintains a comprehensive set of board-adopted policies and district procedures aligned with the requirements of the Every Student Succeeds Act (ESEA) and the precedent established in *Endrew F. v. Douglas County School District*. These policies establish clear expectations that all students, including students with disabilities, are provided access to high-quality, standards-based instruction designed to promote meaningful academic progress. District policy requires that: Instruction for all students is aligned to Tennessee academic standards and grounded in evidence-based practices. Students with disabilities receive a Free Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE). Individualized Education Programs (IEPs) are developed and implemented with fidelity, including measurable goals and aligned services. Specially Designed Instruction (SDI) is clearly defined, documented, and delivered by appropriately licensed personnel. Data-based decision-making drives instructional planning, service delivery, and placement decisions. Ongoing monitoring systems are in place to ensure compliance, effectiveness, and continuous improvement. In addition, district procedures outline expectations for IEP development, progress monitoring, evaluation practices, and the use of multiple data sources to inform decisions. These procedures are reinforced through administrative oversight, internal audits, and required professional learning. Individualized Instruction and IEP Development In compliance with *Endrew F.*, IEP teams develop individualized education programs that are reasonably calculated to enable each student to make meaningful progress in light of their unique circumstances. Goals are measurable, deficit-based, and designed to support both academic and functional growth. Progress toward these goals is monitored frequently and communicated to families, with adjustments made as needed. High-Quality Instructional Practices Teachers implement evidence-based instructional strategies, including differentiated instruction, scaffolding, and explicit teaching. The LEA emphasizes inclusive practices, co-teaching models, and universal design for learning (UDL) to ensure access for all learners. For students with disabilities, specially designed instruction (SDI) is a critical component of service delivery. SDI is tailored to address each student's unique needs resulting from their disability and ensures access to the general education curriculum. This includes adapting the content, methodology, and/or delivery of instruction to support meaningful progress toward IEP goals and grade-level standards. SDI is delivered by qualified personnel and may occur across settings, including general education classrooms, intervention blocks, or specialized environments, depending on student need. Instructional materials are vetted for alignment to state standards and cultural responsiveness, and educators are supported in implementing SDI with fidelity through collaboration, planning, and ongoing professional learning. Monitoring and Accountability The LEA conducts regular monitoring of instructional practices, IEP implementation, and student outcomes through classroom observations, audits, and compliance reviews. District leaders use this information to provide targeted support to schools and ensure continuous improvement. Family engagement is also prioritized, with parents included as active members of the decision-making process. Through these coordinated efforts, the LEA ensures that all students including those with disabilities receive instruction that is rigorous, individualized, and designed to promote meaningful academic progress in alignment with both ESEA and the expectations outlined in *Endrew F.*.

Ensuring Students Are Making Academic Progress

Support Requested

37. Please describe any support needed from the department to assist in meeting the requirements outlined in this form. All reasonable requests will be considered. * Continued training on DLM