

## 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#

796 - Germantown

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

Rhodes, Erin

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

- 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.* \*

1.28

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.* \*

0.95

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.* \*

1.29

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

1.64

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

1.17

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

1.12

## 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.* \*

1.32

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.* \*

1.05

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.* \*

1.36

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

1.7

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

1.08

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

1.03

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

### 16. Science Participation Rates 2020-21 \*

1.22

### 17. Science Participation Rates 2021-22 \*

1.21

### 18. Science Participation Rates 2022-23 \*

1.45

### 19. Science Participation Rates 2023-24 \*

1.37

### 20. Science Participation Rates 2024-25 \*

1.34

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

1.38

## 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**. \*

6

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

1

## 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? \*

At the beginning of each school year, special education teachers provide a list of students being considered for participation in alternate assessment. Following the state guidance for criteria one and utilizing the Alternate Assessment File Review Rubric, school psychologists complete a thorough and detailed review for each student. If the necessary data is not available for a student, an IEP team meeting is convened to determine the need for additional testing. Additionally, annual training is provided to all special education teachers at the start of the school year.

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

In addition to reviewing previous evaluations and present levels of performance, IEP teams utilize observations and data collection from the student's time in the general education setting. Additionally, all students in grade K-2 who have not been determined to be participating in alternate assessment participate in Tier 1 benchmark assessments and quarterly standards-based progress reports from their general education teacher. This data is also used to guide the IEP team in the alternate assessment consideration.

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

Adaptive behavior data allows team members to observe how a student's disability affects them across their day in the school environment including skills in the following areas: Communication, Social, Self-care, and independence and the ability to follow routines. If a student is severely impacted in their communication skills, independence, or ability to follow directions, the regular TCAP with accommodations becomes unreachable as a measure of academic/skill achievement.

## 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? \*

Every student is provided thorough assessments to determine their present level of performance in each deficit area. Instruction is then designed to specifically address these areas. Instructional methods are evidence based, measured by weekly data collection and monitored for effectiveness.

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

In addition to reviewing previous evaluations and present levels of performance, IEP teams utilize observations and data collection from the student's time in the general education setting. Additionally, all students in grade K-2 who have not been determined to be participating in alternate assessment participate in Tier 1 benchmark assessments and quarterly standards-based progress reports from their general education teacher. This data is also used to guide the IEP team in the alternate assessment consideration.

## 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? \***

Continuous progress monitoring and using assessments for present levels of performance, the majority of students requiring extensive supports for whom participation in alternate assessment is being considered are evaluated using assessments that focus on foundational skills including communication, self-help, personal safety, etc. These assessments include, but are not limited to ABLLS, AFLS, and EFL and are utilized when a student is unable to show growth on other assessments like Brigance and KTEA. Likewise, these students also require individualized instruction with repeated practice in order to make progress and master essential foundational skills.

#### **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? \***

GMSD provides training opportunities to all special education teachers (preschool- high school) regarding LRE decisions with an increased emphasis for preschool and K-2 service providers regarding LRE, focusing on maximizing, to the extent possible, a student's time in the general education setting.

#### **31. How does the IEP team distinguish between supports required due to the student's disability and supports that are available as part of the instructional environment? \***

The IEP team distinguishes between the two by asking: Has the student failed to make adequate progress with typical supports? Is the need directly tied to the disability? Does the support require specialized, individualized instruction? If the answer is yes, the support becomes part of specially designed instruction within the IEP. If not, it remains part of the general instructional 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.

GMSD's alternate assessment participation data is comparably aligned to the overall GMUSD population.

*(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? \*

When discussing participation in alternate assessment, our GMSD service providers ensure that parents are aware and understand the implications, the available diploma options, and the fact that the decision can be changed at any time if determined by the IEP team. The GMSD ESE District Office Team has also held parent engagement sessions that have included sessions focusing on alternate assessment and diploma options.

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

Copies of draft IEPs provided to parents prior to a meeting do not include services, LRE statements, or assessment participations. These areas of the IEP are discussed and agreed upon within the IEP meeting with all team members present, including the parents.

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? \*This discussion is part of the IEP process and discussed at each annual meeting. The school psychologist reviews the data with the school team in preparation for each yearly decision.

## 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.\*

GMSD ensures compliance and student progress by:

1. Working with the Teaching, learning and academic department in supporting strong Tier I instruction and working to provide RTI<sup>2</sup> to identify and intervene early.
2. Developing data-driven, ambitious IEPs
3. Delivering specialized instruction tailored to student needs
4. Continuously monitoring and adjusting based on progress data

This system ensures all students with disabilities are set on a path to make meaningful, measurable academic progress consistent with federal and state expectations.

## 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