

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#

798 - Millington Municipal Schools

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

Godwin, Melinda

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. **

1.35

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. **

1.35

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. **

1.36

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

1.44

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

1.35

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

1.45

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.* *

1.36

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.* *

1.36

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.* *

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.* *

1.45

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

1.22

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

1.45

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

16. Science Participation Rates 2020-21 *

1.33

17. Science Participation Rates 2021-22 *

1.33

18. Science Participation Rates 2022-23 *

1.38

19. Science Participation Rates 2023-24 *

1.41

20. Science Participation Rates 2024-25 *

1.47

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

1.69

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**. *

5

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

5

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? *

When informing teams about the requirements and implications of a student participating in the alternate assessment, our district prioritizes clear, transparent, and supportive communication to foster professional alignment. The IEP team, which is led by the school psychologist, carefully explains the purpose of the assessment, emphasizing that it is designed specifically for students with the most significant cognitive disabilities who require extensive, individualized instruction aligned with alternate academic achievement standards. Beyond explaining the eligibility criteria and the data-driven decision-making process, the case managers and psychologists proactively discuss the long-term implications of this choice, including its impact on diploma options, post-secondary opportunities, and future educational pathways. By providing comprehensive written resources, addressing questions directly, and ensuring teams fully understand both the procedural requirements and the rationale behind the recommendation, we empower teams to make informed decisions that serve the best interests of the student's unique learning journey.

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

In our district, participation in alternate assessment is determined annually through a comprehensive data review by the IEP team. Led by the School Psychologist, the team evaluates cognitive and adaptive scores—generally targeting three standard deviations below the norm—alongside achievement and communication data. We prioritize procedural consistency across all sites to ensure equitable decision-making. When standardized assessments are deemed unreliable by specialists, the team employs a holistic approach to determine the most appropriate placement. Furthermore, the team rigorously assesses the student's participation in Tier 1 instruction, confirming that the student is placed in their Least Restrictive Environment and provided with the necessary supports to engage with grade-level core content.

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

Process for Determining Alternate Assessment Eligibility:

Criterion One

process? *

When the team looks at adaptive behavior, they are evaluating the real-life skills a student uses to navigate their day. While an IQ test measures how the student thinks, adaptive data measures what they actually do in the classroom, at home, and in the community. To make an informed decision, the IEP team looks at three main areas: how a student communicates and learns (Conceptual), how they get along with others (Social), and how they handle practical tasks like staying safe and following routines (Practical). The team uses this information to see if there is a significant "gap" between the student and other children their age. Usually, we look for scores that are very far below average, typically three standard deviations below the norm. This helps the team confirm that the student isn't just struggling with schoolwork, but has a deep, ongoing need for a completely different kind of curriculum. By comparing these real-life skills with test scores and teacher observations, the team can be sure they are choosing the path that gives the student the right level of support while keeping them connected to meaningful learning.

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? *

Our IEP teams determine whether a student's skill deficits stem from cognitive disabilities rather than instructional disadvantages by conducting a comprehensive evaluation that incorporates multiple data sources. This process involves reviewing standardized assessments, progress monitoring data, classroom performance, and teacher observations while considering the student's access to high-quality, evidence-based instruction over time. The team must also evaluate the impact of environmental, cultural, or economic factors and rule out inconsistent instruction, lack of appropriate interventions, or language barriers as contributing factors. Collaboration among general education teachers, special education staff, parents, and specialists ensures a holistic understanding of the student's needs. By following this thorough, data-driven approach, IEP teams can make informed decisions that accurately reflect the student's abilities and needs.

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

The IEP team, which comprises parents, teachers, assessment specialists, and administrators, conducts a deep dive into multiple data sources, including standardized tests, adaptive behavior scales, classroom observations, and functional evaluations. By examining the student's cognitive profile, communication style, and daily living skills, the team can accurately gauge the level of support needed for the student to thrive. A major part of this discussion focuses on how the student interacts with the general education curriculum and whether they require consistent adult assistance or highly specialized interventions to make meaningful progress. Ultimately, the team makes this decision with a focus on the Least Restrictive Environment (LRE), ensuring the student receives the specific services they need while remaining as connected as possible to their school community.

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 determine the type and level of support needed, the IEP team analyzes a comprehensive set of data that balances academic performance with functional independence. This includes standardized cognitive and achievement scores to establish a baseline of learning potential, along with adaptive behavior scales that measure real-world skills such as communication and self-care. The teams also rely heavily on progress monitoring data and classroom observations to track how a student responds to current interventions and to quantify the frequency and intensity of adult prompting required for task completion. By combining this data with specialized reports such as behavior assessments or technology reviews, the team can provide clear evidence of the specific changes and classroom setting a student needs. This approach ensures that every support is backed by evidence, showing exactly what is required for the student to make real progress. Instead of guessing, the team uses these various data points to justify why certain modifications or smaller environments are necessary for the student to succeed.

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? *

To determine the necessary level of support, the IEP team conducts a functional gap analysis to identify the distance between a student's current skills and the demands of their learning environment. This process involves evaluating the intensity of adult assistance required, ranging from simple verbal prompts to constant 1-to-1 supervision, and identifying specialized needs such as medical care, behavioral regulation, or assistive communication tools. When a highly modified setting is considered for all or part of the day, the team must justify why the student cannot make meaningful progress in a general education classroom, even with maximum accommodations. By following the continuum of the Least Restrictive Environment (LRE), the team ensures that the student is placed in the most inclusive setting possible while still receiving the intensive, specialized instruction and environmental modifications required to meet their unique goals.

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 disability-specific supports and general environmental resources by focusing on necessity versus availability. While many classrooms use Universal Design for Learning (UDL) to provide tools such as visual schedules or flexible seating to all students, disability-related support is a legal requirement that is specifically tailored to bridge the gap caused by a student's impairment. The team conducts a necessity-based analysis to determine whether a student requires specific, intensive interventions to access the curriculum. This process distinguishes essential, specialized supports from the general tools typically provided to all students. By focusing on whether a student can make meaningful progress without a particular service, the team ensures the IEP provides the targeted, high-level assistance necessary to overcome the specific barriers created by their disability that goes beyond what is typically provided to their peers. By documenting these accommodations, goals, and services in the IEP, the team ensures that the student receives the targeted, high-intensity support required for their unique needs, rather than relying solely on the general supports available in the standard 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.

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.

In the alternate assessment participation, there is no significant discrepancy across subgroups. Our status is as follows: Economically Disadvantaged - 40% versus Non-Economically Disadvantaged - 60% English Language Learner 0% Male - 56% versus Female 44% Black or African American 48% versus White - 48%, with Hispanic at 2% That said, a plan to reduce disproportionate participation among subgroups is not needed at this time.

*(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 informing parents about the requirements and implications of their child participating in the Alternate Assessment, it is essential to provide clear, transparent, and supportive communication. The IEP team explains the purpose of the Alternate Assessment, emphasizing that it is designed for students with the most significant cognitive disabilities who require extensive, individualized support and instruction aligned with alternate academic standards. Teams inform parents about the eligibility criteria, the decision-making process, and how the assessment aligns with their child's unique learning needs. Additionally, the team discusses the long-term implications, including how participation may impact diploma options, post-secondary opportunities, and future educational pathways. Our team provides written resources and answers questions, ensuring parents fully understand their rights and the rationale behind the recommendation, fostering collaboration and helping parents make informed decisions in the best interest of their child.

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

Parents are essential partners in the alternate assessment decision-making process, as they provide a unique view of the student's abilities outside of school. The IEP team includes them by ensuring they understand that this decision changes the student's path from a traditional diploma to a certificate of completion. During the meeting, the team walks the parents through the specific criteria, sharing data on the student's cognitive and adaptive skills to show why an alternate curriculum is being considered. Parents contribute vital information by describing how the student communicates at home, their level of independence with daily chores, and how they navigate the community. This data is weighed equally with school-based testing to ensure the team has a full picture of the student's needs. Ultimately, the decision is a collaborative one; parents must be fully informed of the implications and must participate in the final consensus to ensure the chosen path provides the best balance of challenge and support for their child's future.

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 IEP team follows a structured annual cycle to revisit the student's participation in alternate assessments, beginning with a thorough review of updated cognitive and adaptive data. During the annual meeting, the team applies state-specific eligibility criteria to ensure that the need for an alternate assessment is a direct result of a significant cognitive disability rather than external factors such as poor attendance or language barriers. A very important component of this process is a collaborative discussion with parents regarding the long-term implications, specifically how shifting to alternate standards typically leads toward a certificate of completion rather than a traditional diploma. By reviewing current data and the state's participation checklist every year, the team ensures the placement remains appropriate and accurately reflects the student's ongoing need for a highly modified curriculum and assessment model.

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.*

To meet the standards set by ESEA and the *Endrew F.* ruling, MMSD maintains policies that treat students with disabilities as general education students first, ensuring they have access to the same rigorous state standards as their peers. Under the *Endrew F.* "reasonably calculated" standard, procedures require IEP teams to move beyond minimal progress by developing ambitious, measurable goals based on detailed present-level data (PLAAPF). These goals are supported by Specially Designed Instruction (SDI), which involves adapting the content or delivery of instruction to address the student's unique needs. To ensure these policies translate into actual academic growth, MMSD uses systematic progress monitoring to track student performance against their goals. If the data indicates that a student is not making appropriate progress, the LEA's practice is to immediately reconvene the IEP team to adjust the supports, ensuring that the educational program remains appropriately challenging and compliant with federal accountability requirements.

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. * MMUSD previously held a Zoom session with Alison Gauld to provide administrators with a deeper understanding of the Alternate Assessment guidelines, the specific decision-making criteria for each section, and the impact, or lack thereof, on school accountability scores when these students participate in the regular TCAP. At the time, many leaders felt external pressure to place students from Functional Skills classes into the alternate assessment, even when those students did not strictly meet the eligibility requirements. The meeting was designed to alleviate these concerns by clarifying that the small number of students in these programs should not drive assessment decisions based on potential scores. Instead, the session refocused administrators on using state-mandated criteria to determine when a student's cognitive disability is truly significant enough to warrant an alternate assessment. This moved the district away from a compliance-heavy mindset and toward a practice of ensuring that testing remains a meaningful reflection of what students are actually learning in the classroom. However, MMUSD is open to any and all support from TDOE on this matter.