

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#

830 - Sumner County

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

Steelman, Kevin

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

- 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.* *

1.18

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.* *

1.41

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

1.33

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

1.09

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

1.52

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.* *

1.17

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.* *

1.25

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.* *

1.4

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

1.33

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

0.97

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

1.51

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

16. Science Participation Rates 2020-21 *

1.24

17. Science Participation Rates 2021-22 *

1.22

18. Science Participation Rates 2022-23 *

1.42

19. Science Participation Rates 2023-24 *

1.27

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. *

1.12

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**. *

31

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

20

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? *

The district provides training for certifying specialists on the criteria teams use to determine the need for alternate assessments. Key personnel, including the exceptional education supervisors, director of exceptional education, and school psychologists, participated in a viewing and discussion of the Alternate Assessment: The Federal Cap of 1% and Implications of Participation webinar by Alison Gauld. This guidance was then delivered through whole-group training, case studies, and a district-level review of students identified for alternate assessment participation. While all students are reviewed annually, students who score "advanced" in at least one area are specifically brought to the attention of certifying specialists for a focused review of their appropriateness for the alternate assessment. IEP teams receive guidance from certifying specialists and exceptional education supervisors regarding what constitutes a significant cognitive disability. In addition to this training, monitoring, and ongoing guidance, the district provides resources from the Tennessee Department of Education (TDOE) and locally created materials to help train and support teams in understanding the alternate assessment criteria and the 1% cap.

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

The certifying specialist reviews and leads the team in interpreting the evaluation data. The IEP team examines all available assessment data, including cognitive and adaptive measures, observations, classroom performance, and summative and formative assessments, to determine if the student has a significant cognitive impairment and a significant adaptive impairment. The team reviews assessment data over time for consistency and discusses if the data may be a lower estimate of the student's abilities. Any variance in test scores, including highest and lowest scores, is considered, and the team decides if additional testing is necessary.

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

Process for Determining Alternate Assessment Eligibility:

Criterion One

The certifying specialist leads the IEP team in interpreting the evaluation data by reviewing all available assessment information. This includes cognitive and adaptive measures, observations, classroom performance, and both summative and formative assessments. The central purpose is to determine if the student presents with both a significant cognitive impairment and a significant adaptive impairment. The team thoroughly examines assessment data collected over time for consistency and to ensure the results do not underestimate the student's actual abilities. Any variation in test scores, such as the highest and lowest results, is discussed to determine if further testing is needed. A specific review of adaptive scores over time is conducted, focusing on the consistency between the ratings provided by the parent and the school.

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 team reviews how the student's identified cognitive and adaptive impairments affect their ability to access standards-aligned instruction (both current and past). The team examines instruction across all academic areas to determine if the student is able to access and engage with the teaching. They consider the necessary accommodations for access and any required modifications. Furthermore, the team discusses the frequency, location, and method of delivering the standards-aligned instruction. Finally, the team reviews data from goals and objectives to ensure the student is progressing in the standards-aligned curriculum and can use the learned skills in different settings.

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

The team reviews any available summative and formative academic data within the curriculum, annual IEP goals, and short-term objectives. The team compares these results to observational and historical data to determine skill deficits versus appropriate instructional opportunities. The IEP team conducts a comprehensive and systematic review of the student's academic performance, utilizing a variety of data sources. This process includes analyzing all available summative assessments, which measure the student's achievement at the end of a unit or instructional period, as well as formative academic data, which provides ongoing feedback on learning and instruction. These data points are examined in direct relation to the student's current IEP goals and associated short-term objectives, ensuring alignment between instruction, evaluation, and the student's individual needs. The teams compare assessment data and academic results against both current observational data and historical performance. By comparing current academic outcomes with these established benchmarks and progress monitoring, the team can accurately differentiate between true skill deficits (a lack of fundamental knowledge or ability) and instances where the student may have had inappropriate instructional opportunities (a mismatch between the student's needs and the instruction provided or insufficient access to appropriate curriculum and supports due to missed instructional opportunities).

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 team reviews a comprehensive set of individual data to understand the student's needs. This includes cognitive assessments, adaptive behavior results, multiple observations across staff, achievement data (summative and formative), and analysis of current and past grade-level performance. The Present Levels of Academic Achievement and Functional Performance (PLAAFP) in the IEP are considered. Both summative and formative data are considered, along with parent input regarding the student's skills, needs, and performance at home, and student input (whenever possible) about their preferences, challenges, and goals. The team discusses data on student performance across the school setting in order to understand the consistency of the need for intensive support in all environments. Collectively, this data demonstrates if the student's disability significantly impacts their ability to access and make progress in the general curriculum without extensive specialized instruction and 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? *

The student's data, academic performance, adaptive performance, and response to consistent standards-aligned instruction (appropriately modified with accommodations to ensure access to the curriculum and student engagement) indicate the need for additional supports. The team considers the student needs to access the curriculum and instruction in the regular ed setting, prior to determining the need for a special ed setting and/or modified content.

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? *

IEP teams consistently evaluate the individual student's needs for extensive specially designed instruction. This instruction involves adapting the content, methodology, or delivery of instruction to address the unique needs resulting from the student's disability, and it is provided in addition to universal design for learning instruction.

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.

The district was not found to have disproportionality during the 2025 monitoring, yet monitors the participation rates for any trends of disproportionality.

*(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 will receive any draft IEPs or reports at least 48 hours before the meeting in which they will be discussed. The IEP team is trained to discuss the potential negative effect on a student's ability to learn standards-based content when the curriculum is modified or based on alternative standards. Any time a modified curriculum or alternative standards are considered, the potential impact on diploma options will be discussed at the IEP meeting. These discussions and final decisions are made by the IEP team, and parent participation is included whenever possible. Parents are encouraged to attend meetings, which can be in person or virtual, at a mutually agreed-upon time.

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

Parents are given the opportunity to engage in teacher-parent communication frequently throughout the school year. When an IEP meeting is requested, the parent is given proper notice and a meeting is set at a mutually agreed-upon time. During the IEP meetings, the team should discuss the potential negative effects on standards-based acquisition and diploma options, which was also part of the initial discussion, at annual IEP meetings. Following this discussion and the team's decisions, the entire IEP team, including the parent, signs the IEP, which names the appropriately-aligned state assessments. Following the meeting, the parent receives a copy of the IEP and a PWN explains and decisions.

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 assesses annual goals, short-term objectives, and academic growth using various methods including formative and summative assessments, observations, and curriculum-based progress. Further review is conducted using progress monitoring and benchmarking data. Parents receive updates on this progress at the same time as their child's non-disabled peers. Teams are trained that students may transition to general ed assessments at anytime, based on the data considered by the IEP team.

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 LEA ensures that students with disabilities are provided instruction that meets the requirements of ESEA and *Endrew F.*, and that they make appropriate academic progress, through Individualized Progress Monitoring and Assessment (including annual goals and short-term objectives), using formative and summative assessments, observations of student performance, and curriculum-based progress monitoring. The IEP teams review student data that includes formal progress monitoring and benchmarking data to ensure the educational program is reasonably calculated to enable the child to make progress appropriate in light of the child's circumstances, as required by the *Endrew F.* standard. In addition, parent communication ensures that guardians receive updates on their child's academic progress at the same frequency and time as the updates provided to the parents of their child's non-disabled peers.

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 Tennessee Department of Education (TDOE) can continue to offer helpful and deliberate resources to support school teams. These resources include guidance documents to assist teams in deciding when an alternate assessment is appropriate for students, opportunities for professional collaboration (communities of practice), instructional video series, and regular meetings from TDOE leadership, such as the bi-monthly meetings for School Psychologists.