

## 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#

930 - White County

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

Davis, Stephanie

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. \**

1.15

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. \**

1.48

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. \**

1.58

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

1.65

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

2.32

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

2.72

## 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.* \*

1.16

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.* \*

1.47

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.* \*

1.6

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

1.5

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

2.1

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

2.54

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

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

1.31

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

1.47

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

1.44

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

1.49

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

2.65

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

2.81

## Number of Students Scoring

To calculate: Log into KITE - Reports - Alternate Assessment Reports - Year 2025 - LEA Name and select the .PDF file. The first table in the report provides the number of students scoring Advanced by grade and subject. Calculate the total number of students scoring Advanced for each subject.

22. In school year 2024-25, list the total number of students scoring "Advanced" for **ELA**. \*

3

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

0

## 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 engage in annual professional development to reinforce that alternate assessment is reserved exclusively for students requiring extensive, direct individualized instruction and substantial support to access grade-level standards. This decision-making process is anchored in a comprehensive analysis of current academic, functional, and social data. Teams prioritize the Least Restrictive Environment (LRE) by evaluating a student's ability to participate in general education settings with modified materials and specialized instructional methods. By identifying specific supports for various environments, teams ensure that students can meaningfully maintain, generalize, and transfer skills across multiple settings.

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

White County Schools upholds high expectations for all learners by providing every 2nd-grade student, including those with the most significant cognitive disabilities (unless the IEP team has determined that it is not appropriate), the opportunity to participate in the general TCAP. This proactive approach allows IEP teams to establish an authentic performance baseline and ensures that the decision to move toward alternate assessment is based on actual assessment experience rather than pre-determination. Once a student has been identified as needing to participate in alternative assessment (ALT), this becomes a topic of focus at each annual IEP meeting thereafter. By annually auditing individual student data (previous years Alt data, goals, progress monitoring, and benchmark data), IEP teams can identify and correct any misidentifications of students for alternative assessment. We specifically monitor high-performing DLM scores as a trigger for team discussions regarding a transition to the regular TCAP, ensuring students are always assessed in the least restrictive and most appropriate format.

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

Alternative assessments are reserved for our students who meet specific criteria. Adaptive behavior data provides the evidence for "Significant Cognitive Disability." The IEP team use data derived from multiple sources. Standardized

## **Process for Determining Alternate Assessment Eligibility:**

### **Criterion One**

tools (eg. Vineland-3 or ABAS-3, etc.) are use to determine if the student's functional skills are significantly below age-expectations. Additionally, informal assessments are incorporated into the overall assessment. A student must demonstrate adaptive functioning that is at least two standard deviations below the mean in multiple domains to qualify.

## 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? \*

To ensure that students who participate in the ALT assessment are receiving instruction that is linked to grade level content standards, teachers provide instruction at a reduced depth and breadth of the exact same grade-level standards their peers are learning. Additionally, teachers use Access Points and strategic Scaffolding to ensure students have "just enough" support to ensure they engage with productive struggle with the content. Special Education Teachers collaborate with General Education teachers to ensure the same topics and standards are being addressed for students regardless of the assessment type the student is scheduled for. Lastly, students' individualized education plans contain goals and objectives that relate to specific skill deficits. The IEP team collaborates to develop their goals and objectives to align as close as possible with grade level content standards.

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

The IEP team uses results from previous KITE (DLM) test, TCAP Alt paperbased assessments, benchmark data (iReady), progress monitoring data (Easy CBM), classroom progress, teacher observation and analysis of student work products to make informed determination of the need of an alternate assessment.



## 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? \*

Teams prioritize the Least Restrictive Environment (LRE) and evaluate a student's ability to participate in general education settings with modified materials and specialized instructional methods. By identifying specific supports for various environments, teams ensure that students can meaningfully maintain, generalize, and transfer skills across multiple settings, while participating in the general education setting as well as a smaller more inclusive setting that requires more direct individualized instruction.

#### 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? \*

Every decision begins with the Present Levels of Academic Achievement and Functional Performance (PLAAFP). The IEP team looks at Evaluation Results (Psycho educational eval, speech/language assessments, OT data, and PT data), and progress Monitoring data (Benchmark data, Social emotional assessments, prevocational assessments), as well as how the student responded to previous interventions.

#### 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 biggest differentiator is Specially Designed Instruction (SDI). While a "support" might be a tool (like a laptop), SDI is the method of teaching. If the instructional environment provides a reading program, but the student requires a specific, multisensory approach because of dyslexia, that specialized methodology is a disability-specific requirement, not just a Gen. Ed. resource. Additionally, the team reviews current data to see if the environment alone is sufficient. In a general education room, a visual schedule is an environmental support, while for a student with a disability, that visual schedule may be a required accommodation because the students' disability-related needs for transition support are so high that they cannot function without it. If these supports are identified, they are implemented within the IEP.

## 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.

A review of the LEA data demonstrates a higher percentage of students (1.75%) identified as Developmental Delay, compared to the state's percentage of students (0.93%). A review of procedures reveals a high teacher to student ratio in our Sped Pre-K classes. Thus, reducing the effectiveness of targeted interventions aimed at closing these developmental gaps prior to beginning Kindergarten. We have added an additional Special Education preschool classroom for the 2026-2027 school year. Our primary objective is to provide smaller teacher to student ratios that will allow for targeted, evidence-based interventions that accelerate the student's development. By focusing on specific deficit areas, we aim to close the developmental gap between the student and their same-aged peers, with the ultimate goal of transitioning them toward age-appropriate proficiency, and beginning their Kindergarten year in the General Education classroom. Furthermore, our data demonstrates higher participation rates compared to the state participation rates in two additional areas; Intellectual Disability (LEA - 64.91% compared to State - 47.17%) and Traumatic Brain Injury (LEA - 1.75% compared to State - 0.55%) While these current participation rates are higher than the state average, we conduct annual audits of student performance (including DLM scores and progress monitoring) to identify students who are ready to transition back to the general TCAP, and never determine eligibility by disability category.

*(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? **\*** Informing parents about the alternate assessment is not just a procedural requirement; it is a critical conversation about a student's educational trajectory. Communication with parents is transparent, ongoing, and data-driven. When presenting Evaluation and PLAAFPs (Present Levels of Academic and Functional Performance), the IEP team uses descriptive language and visual graphs rather than just jargon or raw scores. An explanation of the implications of moving to the ALT assessment is provided through a combination of Verbal Discussion and Written Notice (Prior Written Notice). To ensure the highest level of procedural integrity, our district utilizes a centralized oversight model led by one dedicated school psychologist. This specialist monitors alternate assessment eligibility district-wide, ensuring that each student's placement is rigorously reviewed for alignment with state criteria. This targeted approach allows for a continuous feedback loop, identifying students who demonstrate the progress necessary to transition back to the general TCAP assessment.

34. How are parents included in the IEP team decision-making process? **\*** The decision to move to ALT assessment (or not) is made with the parent participating in the decision making process after a thorough discussion has taken place. Working with the school psychologist, the team is reminded that the decision is based on a significant cognitive disability and the need for extensive individualized support, not just a specific diagnosis. Second, the team explicitly inform parents that participating in an alternate assessment has specific consequences: Diploma Path: In Tennessee, taking the alternate assessment typically aligns with the Alternate Academic Diploma (AAD) or a Special Education Diploma, rather than the standard High School Diploma. Academic Standards: Explain that while the student is still learning grade-level standards, the content is simplified, which may affect the student's preparation for post-secondary education or competitive employment.

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? **\*** If alternate assessment is determined to be the most appropriate for the student, the team makes a commitment to review the decision annually. The decision for a student to participate in the alternate assessment is not a permanent placement. Eligibility for alt assessment is reexamined at every annual IEP meeting. If data suggests the student has made progress to the point where they no longer meet the criteria—or if the team determines the general TCAP is a better fit—the IEP team can change the assessment identification at any time based on a review of current data.

## 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 ensure White County Schools meets the high bars set by the Elementary and Secondary Education Act (ESEA) and the Supreme Court's ruling in *Endrew F. v. Douglas County School District*, we are moving beyond mere "compliance" and focus on "substantive outcomes." We are working to make sure our IEP goals are not just functional, but ambitious. Working in alliance with the Teach All Students (TAS) we are providing students who are significantly below grade level, with instruction that is aligned with grade level state academic standards. Additionally, all academic decisions are based on current data. Lastly, we use data-driven PLAAFPs to shape our goals (based on demonstrated skill deficits), which then are the basis for determination of services.

## 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. \* White County Schools is dedicated to reducing the number of students participating in ALT Assessment. Our aim is to be "more than compliant." We will continue to use the 2nd-grade TCAP as a universal baseline. By allowing all 2nd-grade students with disabilities to attempt the general TCAP (with all allowable accommodations), the IEP teams will have "hard data" to determine the most appropriate assessment path for 3rd grade. White County Schools will continue to seek the highest level of procedural integrity, by utilizing a centralized oversight model led by one dedicated school psychologist. Thus, allowing for a continuous feedback loop, identifying students who demonstrate the progress necessary to transition back to the general TCAP assessment.