

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#

941 - Franklin SSD

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

Robertson, Stacey

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. **

0.76

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.* *

1.35

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

0.76

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. *

0.76

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**. *

1

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

3

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? *

Guidance is communicated to staff through multiple, consistent channels to ensure clarity and accessibility. This includes direct communication from the district, as well as reinforcement through the staff newsletter and the internal staff website, where guidance documents, expectations, and updates are housed for ongoing reference. In addition, school psychologists play an active role in communicating and reinforcing this guidance at the school level. As key members of the evaluation and IEP team, they support staff in understanding alternate assessment participation criteria, interpreting evaluation data, and ensuring that decisions are grounded in comprehensive, multidisciplinary information. This layered approach helps ensure that guidance is not only distributed, but also understood and applied consistently in practice.

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

The IEP team uses multiple sources of data to make individualized determinations regarding alternate assessment participation. This includes intellectual functioning, adaptive behavior assessments, direct observations across settings, developmental history, and consideration of exclusionary factors. Both current and historical evaluation data are reviewed to ensure a comprehensive understanding of the student's needs. The team specifically examines whether the student demonstrates significant cognitive and adaptive deficits and requires extensive, individualized supports across settings to access instruction aligned to alternate academic achievement standards. This determination is made through a multidisciplinary process, with input from qualified personnel, including school psychologists, to ensure that decisions are grounded in valid, reliable data and reflect the student's present levels of performance and instructional needs rather than disability category or placement.

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

Adaptive behavior data is reviewed alongside cognitive data to determine whether the student meets criteria for alternate assessment participation. The IEP team considers results from standardized measures and functional

Process for Determining Alternate Assessment Eligibility:

Criterion One

performance across settings to assess the student's level of independence and need for support. This data is discussed during eligibility and IEP meetings to ensure alignment with participation criteria, confirming that both significant cognitive and adaptive deficits are present and that the student requires extensive, individualized supports.

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? *

Students receive access to Tier 1 instruction with appropriate accommodations and modifications, along with targeted special education services aligned to identified areas of need. The IEP team reviews the student's response to instruction, progress monitoring data, and consistency of supports across settings to ensure limited progress is not due to lack of access or insufficient instruction.

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

The IEP team uses multiple data sources, including progress monitoring, benchmark assessments, and data on the effectiveness of accommodations, modifications, and program supports. This information is reviewed to determine the student's response to instruction and guide decision-making.

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 IEP team reviews multiple data sources, including present levels of performance, LRE, service delivery, and assistive technology needs, along with the frequency and intensity of accommodations and modifications across settings. Progress monitoring and benchmark data are also analyzed to determine the student's need for extensive, individualized 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 IEP team determines needed supports by analyzing whether the student requires extensive, repeated, and individualized instruction beyond what is typically available in the setting. Teams consider the level of adult support, instructional intensity, materials, and methods of access across environments to ensure supports are driven by the student's individual needs rather than the setting itself.

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 supports by determining whether the student requires individualized, specially designed instruction or supports beyond what is typically available to all students in the instructional environment. Teams analyze the frequency, intensity, and level of adult support needed, as well as the student's response to instruction across settings. Supports that are universal or available to all students are not considered individualized supports. The team ensures that identified supports are directly tied to the student's disability-related needs and are necessary for the student to access and make progress in the curriculum, rather than a result of the setting or general classroom practices.

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.

At this time, the FSD has not identified any significant disproportionality in alternate assessment participation across disability categories or demographic groups.

[REDACTED]

We will continue to monitor disaggregated data regularly to ensure participation decisions remain individualized, data-based, and aligned to alternate assessment criteria.

*(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? *

The IEP team discusses assessment options during IEP meetings, including both general and alternate assessments, and explains the eligibility criteria and implications of participation. This includes the impact on academic expectations and diploma pathways. These conversations typically occur prior to third grade and whenever assessment decisions or significant modifications are being considered. State guidance and resources may also be provided to support parent understanding.

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

Parents are active participants in IEP team meetings and are encouraged to ask questions, share input, and engage in discussion regarding assessment decisions. The team seeks consensus, and all decisions, including parent input, are documented in the IEP.

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 reviews the student's assessment participation at each annual IEP meeting. The decision is discussed using current data and aligned to participation criteria, with documentation included in the IEP, meeting minutes, and prior written notice (PWN).

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 FSD ensures alignment with ESEA and *Endrew F.* by developing IEPs that are reasonably calculated to enable appropriate progress. Teams use present levels, progress monitoring, and benchmark data to set measurable goals and determine services. Students receive access to standards-based instruction with appropriate accommodations, modifications, and, when applicable, specially designed instruction aligned to alternate standards. Ongoing progress monitoring informs instructional adjustments. The FSD conducts internal monitoring of IEP quality and Indicator 5 (LRE) data to ensure access to grade-level standards in the least restrictive environment. IEP teams review progress at least annually to make data-based adjustments and maintain appropriately ambitious instruction.

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 communication of updates and best practice is always appreciated.