

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#

963 - Tennessee School for Blind

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

Angela Adams

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. **

47.06

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. **

44.44

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. **

42.37

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

48.98

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

37.04

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

39.03

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.* *

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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.* *

38.71

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.* *

43.86

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

46

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

33.33

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

34.28

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

16. Science Participation Rates 2020-21 *

46.81

17. Science Participation Rates 2021-22 *

40.74

18. Science Participation Rates 2022-23 *

46.3

19. Science Participation Rates 2023-24 *

42.86

20. Science Participation Rates 2024-25 *

40.74

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

46.42

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**. *

9

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? *

School staff are informed of criteria through mandatory annual professional development [AA1.1] at the start of the school year. District procedures outline that for any student whose Alternate assessment eligibility will be considered that the school psychologist [AA2.1] and either the Director of Special Populations, IEP Facilitator, or Special Education Instructional Coach, must be in attendance to participate in the review of the considerations for participation in alternate assessment. This leadership ensures that the team decision is based on a holistic view of the student and does not focus purely on an IQ and/or adaptive score. It also provides all team members with an opportunity to ask questions; for leadership to explain the impact on future options for the student including graduation diploma pathway, termination of services at age 22, and post-secondary education opportunities; and provide guidance on changes that will need to be made to the IEP.

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

At TSB, it is critical that teams evaluate all relevant areas associated with cognitive disability, as exclusionary factors like vision may impact test results. • review of past and current individual cognitive ability and adaptive behavior assessments • review of past and current eligibility, IEP, psychoeducational reports, and supplementary assessments including but not limited to speech and language, AT, O&M, OT, PT, FVLMA, etc. • results of TN Ready or DLM/KITE and ELPA (if appropriate) assessments • Present Levels of Academic Achievement and Functional Performance (PLAAFP) including classroom assessments and work samples, observational data, IEP goal and objective progress monitoring, RTI universal screener and progress monitoring data, district benchmarks, and age-appropriate transition assessments (when appropriate) Because all students are referred to TSB from their home LEA, an initial review of all student data takes place during the admissions process by district leadership and then again by all team members during the TSB 30-day transition IEP meeting. If a student has transferred to TSB with alternate assessment eligibility already determined on the previous IEP, TSB maintains that testing eligibility until TSB has had time to collect additional data to make an informed decision to either continue eligibility or discuss removing the Alternate assessment eligibility. This could include the IEP team recommending an early re-evaluation to have updated assessment data to make an informed decision.

Process for Determining Alternate Assessment Eligibility:

Criterion One

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

In addition to a significant deficit in a student's cognitive ability (two or more standard deviations below the mean), a student's home and school adaptive behavior data must show a significant deficit (composite score or at least one domain score in areas associated with conceptual, social, or practical adaptive functioning that is 2 standard deviations below mean when compared to same age peers) that require extensive, repeated, and individualized instruction and supports. These deficits adversely impact their ability to be independent in everyday living skills. When discrepancies occur in adaptive ratings between home and school, observational data collected by an assessment specialist is used to help make a final determination.

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 a student's performance is truly reflective of a significant cognitive disability rather than instructional disadvantage, the IEP team must document a consistent history of access to Tennessee Academic Standards through high-quality, standards-based instruction supported by accommodations and modifications and ruled out the lack of instruction in reading or math, or limited English proficiency.

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

Tiered intervention progress monitoring data, IEP goal progress monitoring, current formative and summative assessment data, attendance records, teacher input and observational data, student work samples, student daily schedule, current eligibility and IEP

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? *

Tiered intervention progress monitoring data, IEP goal progress monitoring, current formative and summative assessment data, attendance records, teacher input and observational data, student work samples, student daily schedule, current eligibility and IEP

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? *

Due to TSB being a state special school, students who attend TSB have had an IEP meeting where their LRE was determined to be a more restrictive state special school. However, there is still an internal continuum of services offered at TSB. This can range from a "general education" classroom where students are accessing grade level standards with some support to a combination of "general education" and special education supports to a self-contained, highly modified instruction classroom where extensive, repeated, and individualized instruction and supports are required. LRE is not determined by student disability category or which state assessment they are taking. Alternate Assessment courses can be taught by both general education and special education teachers; therefore, students can access grade level standards with appropriate support and modification in either setting. To justify a highly modified self-contained LRE, documentation must show that even with appropriate support, the student was not making appropriately ambitious progress. The documentation must clearly show that the highly modified self-contained setting was chosen for all or part of their day because it was the only way to provide the level of instruction the student needs to reach their 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? *

Each student's IEP is developed with support designed specially to support them based on current data for the student to access and participate in the least restrictive environment and not based on their identified disability category. Some students may only require support that allows them to access the instructional environment, while other students also need support to allow them to participate in the 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.

LEA Population Demographics compared to Statewide Demographics: Unlike a traditional district that serves a general geographic population, TSBs enrollment is determined by IEP teams (including TSB staff) representing over 140 LEAs across the state of Tennessee who refer students for admissions. We are an LRE based placement for students with visual impairments that require specialized support and services not available in their home LEA which naturally skews our demographics towards the low incidence specific population we were created to serve. TSB's low enrollment prevents us from a robust denominator that keeps alternate assessment percentages naturally lower in traditional LEAs.

Once they transition to TSB it becomes our responsibility to document whether the current data and assessment results support that eligibility or not. TSB maintains the current IEP testing eligibility until the 30-day transition IEP where the TSB team will review current and historical data to make an informed decision to either continue eligibility, discuss removing the Alternate assessment eligibility, or get parental consent for updated assessments through an early re-evaluation. Disproportionality: TSB's 2024-2025 data indicate there was a disproportionate representation of students participating in the alternate assessment based on race/ethnicity. Specifically, students who are Black, Asian, or Hispanic participated in the alternate assessment at a rate of 58.33%, which is 17.33 percentage points higher than their 41% share of the total district demographics and 7.63% higher than the state average. Based on preliminary data for the 2025-2026 school year, that number has lowered to 53%. Students who participated in the alternate assessment that are English Learners was 8.33% is more than double the state average of 3.91%. Based on preliminary data for the 2025-2026 school year, that number has lowered to 6.6%. District Plans to Address Disproportionality: For the 2026-2027 SY, district procedures, guidance documents, and compliance rubric are being amended to reflect clarifying guidance to ensure all alternate assessment eligibility decisions are rooted in current student data as IEP teams walk through the eligibility criteria. This will include Special Populations leadership holding quarterly data reviews to identify if there are any disproportionate representations across all demographic's areas within alternate assessment eligibility. In addition,

*(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? *

TSB Special Populations website is being updated to include parent guidance documents on subjects such as Parent Procedural Safeguards, Tennessee Diploma and Postsecondary Education Options, What to Know Before Your Child's IEP Meeting, High-school and Beyond Guidance, and Alternate Assessment Participation Guidelines. Because making a determination about alternate assessment eligibility has long-ranging impacts, a member of leadership (Director of Special Populations, IEP Facilitator, or Special Education Instructional Coach) must be present at all meetings where Alternate assessment eligibility is being discussed. This ensures that parents and all team members have an expert available to answer specific questions and ensure all team members, especially parents, understand the impact to future post-secondary opportunities. Parents whose native language is not English will have access to translated documents in their native language.

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

Parents are offered a copy and explanation of their procedural safeguards before each meeting. Parents are active IEP team members who are reviewing the eligibility criteria questions within the confines of the IEP meeting. Parents are provided with a copy of all IEP documents, including any evaluation reports, at least 48 hours in advance. For parents whose native language is not English, translators and translated documents are provided. Because the implications of alternate assessment impact a student's future opportunities the IEP team does not have to make a formal decision on the same day that a proposed change to assessment eligibility is made. The team can reconvene in the near future to make a formal decision once the parents have had time to review data, seek any additional guidance or ask additional questions, and consider all options. The parent can also ask to meet to reconsider the eligibility determination at any time.

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? *A member of leadership (Director of Special Populations, IEP Facilitator, or Special Education Instructional Coach) must be present at all meetings where Alternate assessment eligibility is being discussed. There is no timeline for when a decision can or must be made about assessment eligibility. In addition, the IEP Audit Rubric is being updated to reflect completed eligibility determination worksheets are uploaded to Pulse and the IEP reflects the appropriate justification statements based on the team decisions. Upon the IEP being finalized, the IEP Facilitator will work with school administrators to ensure the student's school reflects the appropriate course codes based on the student assessment eligibility determination, so the correct state assessment is generated. Following the meeting, updated IEP at-a-glances are distributed to all staff that work directly with the student and staff sign off acknowledging they are aware of the changes to the IEP. Once DLM/KITE scores are released, the Special Populations leadership team will review and advise IEP teams if a meeting needs to be scheduled to discuss state testing eligibility for any student(s) scoring a Level 4 on the Final 3rd band for reading and/or math.

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.* For the 2026-2027 SY, through collaboration with our TDOE Core representative, TSB is focusing professional development on writing appropriately ambitious IEPs. Staff will be provided with PD on using baseline data to generate a rate of improvement that is appropriately ambitious in light of the students' circumstances when writing IEP goals. All IEPs must go through a district IEP Audit rubric to ensure the IEP meets these standards. District instructional coaches (ELA, Math, Special Education, Braille and Behavior) meet to review student progress monitoring data and inform intervention needs, collaboratively plan with staff including reviewing student work samples, complete instructional walk-throughs and provide PD on instructional strategies to support student learning in their LRE. Special Education Director, Instructional Coach and IEP Facilitator monitor IEP goal progress monitoring to ensure appropriate data is being taken and flag when data reflects a need for an IEP meeting to discuss possible changes to IEP goals. [AA3.1] Educational assistants are provided will be provided with PD during the Summer of 2026 to assist in gathering data on student IEP goals.

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. *

In preparation for the 2026-2027SY, Director of Special Populations is reviewing the files of all students whose IEP reflects they meet eligibility for the alternate assessment, specifically looking for: 1) has updated testing been completed in the past 3 years 2) does current assessment and supporting data support the need for Alternate assessment based on the eligibility criteria 3) does parental consent for updated testing need to be completed and 4) does the assessment eligibility in the IEP match student data and support eligibility determination. A report will then be generated and shared with Special Populations leadership and priority will be set on scheduling meetings for students who the team may want to propose updated testing, revising the IEP, and/or reviewing over the eligibility criteria again. In addition, professional development for the alternate assessment eligibility is being updated to include sample student data for small PD groups to walk through the three (3) eligibility criteria and determine if the sample student meets the eligibility criteria. Based on the results of that PD, it will be determined if additional PD is needed to support IEP teams in making the eligibility decisions. This will include a review of data sources that should be reviewed with the IEP team to make an eligibility determination. Finally, we will continue to work in collaboration with TN Core on our initiatives discussed in the previous question.