

## 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#

940 - Williamson County

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

Griego, Maria

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.* \*

1.11

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.* \*

0.99

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.* \*

1.09

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

1.07

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

1.01

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

0.96

## 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.* \*

1.19

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.* \*

1.14

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.* \*

1.17

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

1.14

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

0.94

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

0.9

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

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

1

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

1.1

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

1.04

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

1.07

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

1.07

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

1.15

## 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**. \*

29

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

9

## 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 are informed of the criteria and expectations for determining participation in alternate assessment through a structured and ongoing system of professional learning and guidance. All newly hired SSS staff receive required training as part of the district's TNPulse onboarding process. This training includes explicit instruction on alternate assessment participation criteria, required documentation, and the data sources necessary to support data-driven, student-focused decision-making. Staff are trained not only in navigating TNPulse but also in applying the three participation criteria with fidelity and consistency. To ensure sustained access to guidance, all SSS staff have ongoing access to district-developed guidance documents related to alternate assessment participation and criteria through the WCS SSS handbook. The WCS SSS handbook includes standalone guidance documents, procedural references, and access to training slide decks, allowing staff to review and reference expectations at any time to support consistent implementation and informed IEP team discussions. In addition to onboarding support, all SSS staff participated in districtwide professional development in December 2025 focused on IEP development and compliance monitoring. This training included a review of alternate assessment participation criteria, expectations for eligibility determinations, and alignment with TDOE guidance. Targeted training was also provided to school psychologists regarding district assessment resources used to evaluate students' cognitive and adaptive functioning. This included guidance from TDOE on administering nonverbal cognitive assessments for students whose language needs may invalidate verbally loaded measures. When students are unable to access traditional standardized cognitive assessments, school psychologists utilize approved alternate measures (e.g., DASH 3, DP 4), in conjunction with standardized adaptive behavior assessments. In alignment with district expectations, school psychologists enter the student's psychological assessment data related to Criterion One into TNPulse to support consistency and transparency in documentation. This information is shared with IEP teams and used to help guide determinations regarding whether the student meets Criterion One for alternate assessment participation.

#### 25. What data are used to make the determination (e.g., cognitive and adaptive

# Process for Determining Alternate Assessment Eligibility:

## Criterion One

behavior data)? \*

IEP teams utilize multiple sources of data to determine whether a student meets the criteria for participation in the alternate assessment. Primary data sources include the student's most recent psychological evaluation, which provides information regarding cognitive functioning and adaptive behavior skills. School psychologists administer assessments that are valid, reliable, and appropriate to the student's unique profile, including consideration of language, cultural, socioeconomic, and environmental factors. Standardized cognitive assessment data are reviewed in conjunction with standardized adaptive behavior assessments, behavioral data (e.g., rating scales, functional observations), direct and indirect classroom observations, and input from parents/guardians and school staff. In addition, the SSS leadership team facilitates communication with file holders regarding students who have previously scored Advanced in Reading and/or Math on alternate assessments. This information is reviewed alongside other data sources to help guide the IEP team in determining whether a student continues to warrant participation in the alternate assessment. Collectively, these data provide a comprehensive understanding of the student's present levels of performance and support IEP team determinations that are consistent with TDOE participation guidance and eligibility standards.

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

Adaptive behavior data play a critical role in the decision-making process for alternate assessment participation, particularly in determining whether a student meets Criterion One. As standard practice within WCS, standardized adaptive behavior assessments are administered and considered as part of the comprehensive evaluation process. School psychologists gather adaptive behavior data from multiple informants, including general education teachers, special education teachers, and parents/guardians, to ensure representation across settings. Consistent with evaluation standards for Intellectual Disability, additional observations by an assessment specialist may be conducted when discrepancies are noted between raters. These observations support accurate interpretation of adaptive functioning and help determine the consistency and generalization of skills across environments. Adaptive behavior data are reviewed and discussed by the IEP team alongside cognitive, behavioral, and observational data to ensure eligibility decisions are data-based, defensible, and aligned with TDOE expectations.

## 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? \*

WCS ensures that IEP team determinations regarding student performance and skill level are based on the presence of a significant cognitive disability rather than an instructional disadvantage through consistent access to a district aligned, standards-based instructional framework and systematic review of instructional data. All WCS schools implement a shared scope and sequence aligned to Tennessee academic standards for each grade level and course. The scope and sequence outline the content and skills students are expected to master and ensures instruction is delivered in a coherent, sequential manner that supports the development of deep understanding over time. The WCS scope and sequence includes Tennessee academic standards, student-friendly "I can" statements that articulate learning expectations, and instructional resources available to teachers, students, and families. This structure ensures students have equitable access to grade-level instruction prior to any consideration of instructional modification. In addition, WCS is recognized as a Model Professional Learning Community (PLC) at Work district. As part of this framework, teachers engage in collaborative planning, administer common formative assessments, and participate in Teacher Analysis of Common Assessment (TACA) meetings. During TACA meetings, educators analyze student level data to determine whether students are making adequate progress when provided with high-quality Tier 1 instruction and appropriate differentiation. Instructional adjustments and targeted supports are identified to address learning barriers, ensuring that lack of progress is not due to insufficient instruction or opportunity to learn. The IEP team reviews this instructional history, including documentation of differentiated instruction, accommodations, interventions, and progress monitoring, to determine whether the student's needs can be met through access to grade level standards with supports. Only when data demonstrate that a student's learning needs cannot be addressed through Tier 1 instruction and differentiation does the IEP team consider modification of academic expectations. For students with significant cognitive disabilities, modifications may include adjustments to the depth or breadth of grade level standards while maintaining access to the WCS curriculum. Students receiving modified instruction in special education settings are supported through district-approved curricula, including TeachTown and Unique Learning Systems, both of which are aligned to Tennessee state standards, Alternate Academic (AAD) standards, and Dynamic Learning Maps (DLM) Essential Elements. Additionally, the SSS department provides instructional coaching support for teachers serving students with more comprehensive needs. Comprehensive instructional coaches assist educators in navigating the WCS curriculum and implementing appropriate alternate academic standards with fidelity. Through consistent access to standards based instruction, collaborative data analysis, and documented instructional supports, IEP teams are able to distinguish between instructional disadvantage and learning characteristics associated with a significant cognitive disability.



# 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.

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

IEP teams use multiple sources of data to make informed determinations regarding the factors impacting a student's performance and instructional needs. Evaluation data are a primary consideration and include cognitive assessment results, standardized adaptive behavior assessments, behavioral data, observational data, and any additional assessment information appropriate to the student's individual profile. This evaluation data is reviewed in conjunction with the student's academic progress, including progress monitoring data collected through the Response to Instruction and Intervention (RTI<sup>2</sup>) framework and evidence of the student's ability to access and master grade-level standards with differentiation and accommodations. IEP teams examine patterns in academic skill acquisition over time to determine whether lack of progress persists despite access to evidence-based instruction and targeted supports. School based teams also utilize data analysis within the PLC process, including results from common formative assessments and prior cohort TCAP data, to examine trends across grade levels, cohorts, and individual students. This broader analysis helps ensure instructional expectations are consistent and that individual determinations are made within the context of system-wide instructional practices. Collectively, these data sources provide the IEP team with a comprehensive understanding of the student's learning profile and support data-based, defensible decisions regarding instructional expectations and participation determinations.

## 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? \***

IEP teams in Williamson County Schools (WCS) use multiple sources of data to make determinations regarding a student's need for extensive supports and participation in alternate assessment. These data include comprehensive evaluation data such as cognitive assessments, standardized adaptive behavior assessments, behavioral data, and observational information aligned to the student's individual profile. Additional assessment data are considered as appropriate to ensure a complete understanding of the student's learning characteristics. Instructional data are a critical component of this determination. IEP teams review present levels of academic and functional performance, classroom-based data including teacher observations, work samples, and progress-monitoring data collected through the Response to Instruction and Intervention (RTI<sup>2</sup>) framework. Teams also examine the student's ability to access and make progress toward grade-level standards with appropriate differentiation, accommodations, and interventions. For students who received modifications through a replacement curriculum, teams utilize data from the Dynamic Learning Maps (DLM) system, including information related to instructional levels and learning progression. The DLM Instruction and Assessment Planner is increasingly used by teachers to monitor instructional data and align instruction to alternate academic standards. IEP teams are also encouraged to utilize district and state guidance documents, including the Determination of Eligibility for Alternate Assessment Participation forms and the Consideration for Participation Guidelines, to ensure eligibility decisions are data-based and aligned with state expectations. Collectively, these data sources ensure that determinations are based on documented student need and not on instructional gaps or lack of access to appropriate instruction. The data reviewed by the IEP team demonstrate that the student requires extensive direct individualized instruction and substantial supports in order to achieve measurable gains within the grade- and age appropriate curriculum, as progress is not attainable through general education instruction and supports alone.

#### **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? \***

IEP teams determine the type and level of supports needed through a collaborative, data driven process grounded in the student's demonstrated needs and aligned to a continuum of services. WCS SSS teachers follow a continuum of instructional supports designed to meet the needs of all learners, ensuring that decisions regarding supports are individualized and responsive to student performance data. The IEP team reviews evaluation results, present levels of academic achievement and functional performance (PLAAFPs), instructional data, and progress toward IEP goals to determine the intensity and type of supports required. Supports are aligned to the student's IEP goals, functional needs, and, for secondary students, their course of study and postsecondary plans. Team discussions focus on identifying the most appropriate instructional setting and level of support necessary for the student to make meaningful progress beyond what is universally provided to all students. For students whose needs cannot be met through Tier 1 instruction with differentiation and accommodations, and whose LRE includes a highly modified special education setting for all or part of the day, instruction may be aligned to alternate academic standards. In these cases, SSS teachers implement district-approved curricula such as TeachTown and Unique Learning Systems, which are aligned to Tennessee state standards, Alternate Academic Achievement (AAD) standards, and DLM Essential Elements. To support high-quality implementation, WCS instructional coaches specializing in students with more comprehensive needs provide ongoing support to teachers. These coaches facilitate Professional Learning Community (PLC) meetings for educators administering the alternate assessment and use the DLM Instruction and Assessment Planner as a training and instructional alignment tool. This structure ensures that supports are intentional, data-based, and matched to the student's documented needs rather than placement alone.

## 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.

### 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 distinguish between disability related support and supports that are part of the general instructional environment by carefully reviewing what is universally available to all students versus what is required for the individual student to make progress due to the impact of their disability. Universal supports include instructional tools and practices available to all students, such as Chromebooks, Universal Design for Learning (UDL) strategies, and standard classroom accommodations routinely implemented by general education teachers. These supports are not considered individualized or student-specific and are documented as part of the instructional environment rather than as specialized services. In contrast, disability-related supports are identified through evaluation data, PLAAFPs, classroom observations, and work samples, and are directly tied to the student's IEP goals and documented needs. The IEP team determines what supports are necessary for the student to access instruction and make progress beyond what is universally provided. These supports may include intensive, individualized instruction, specialized curricula, direct services, or alternate instructional approaches aligned to AAD standards and DLM Essential Elements. District guidance further supports this distinction. The SSS internal department handbook includes a dedicated section on alternate assessment that outlines the three participation criteria, provides an overview of DLM, and includes training documents and eligibility guidance. Additional teacher handbook resources address alternate assessment participation, ESSA requirements, and the 1% federal cap for students participating in alternate assessment. Educators are directed to these resources to ensure informed decision-making regarding when alternate assessment and individualized supports are appropriate. Through this structured review of universal versus individualized supports, IEP teams ensure that services documented in the IEP reflect the student's individual needs rather than instructional practices available to all students.

## 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.



*(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? \*

In Williamson County, all alternate assessment decisions and eligibility discussions are made at an IEP/Eligibility meeting. The parent is an active participant throughout the decision-making process starting with the eligibility and the criteria for TCAP and TCAP ALT participation. Parents participate mainly via in person, but other attendance methods are available also (phone, ZOOM), so the parent is present and can be an active participant. Parents are provided IEP drafts 48 hours prior to a meeting, so this increases their participation and adds to the discussion of the student's specific needs. IEP teams are instructed to communicate to families that the alternate assessment means that a student is often not being instructed or assessed on grade level standards. Additionally, IEP teams are provided with resources and instructed to assist parents in understanding the implications of alternate assessment on diploma options and post-secondary plans.

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

In Williamson County, all alternate assessment decisions are made at an IEP meeting. The parent is an active participant throughout the decision-making process. Parents are also provided IEP drafts 48 hours prior to a meeting, so this increases their participation and adds to the discussion of the student's specific needs. The IEP team members review each statement regarding state assessment and ensure team discussion. The team answers any questions a parent may have. The IEP team signs the participation guidelines in the IEP meeting that is generated from TNPulse.

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? \*Williamson County Schools hold IEP meetings annually for all students with an IEP. A student's state assessment is decided at each annual IEP meeting. WCS also obtains an individual list from each school of students who are eligible for the alternate assessment every year. We ask each school to provide each student's grade, disability, full-scale cognitive scores, and overall adaptive scores. The Student Support Services (SSS) Specialist for each school reviews the profiles of each student eligible in their building with an analysis of the 3 criteria for TCAP ALT eligibility shared by TDOE. The SSS Specialists will collaborate with their assigned schools to identify any discrepancies in the data. These discussions may lead to reevaluations or IEP meetings to reconsider the team's decisions for a student to be assessed via the alternate assessment.

## 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.\*

All WCS schools implement a shared scope and sequence aligned to Tennessee academic standards for each grade level and course. The scope and sequence outlines the content and skills students are expected to master and ensures instruction is delivered in a coherent, sequential manner that supports the development of deep understanding over time. The WCS scope and sequence includes Tennessee academic standards, student-friendly "I can" statements that articulate learning expectations, and instructional resources available to teachers, students, and families. This structure ensures students have equitable access to grade-level instruction prior to any consideration of instructional modification. Educators analyze student level data to determine whether students are making adequate progress when provided with high-quality Tier 1 instruction and appropriate differentiation and accommodations. Instructional adjustments and targeted supports are identified to address learning barriers, ensuring that lack of progress is not due to insufficient instruction or opportunity to learn. School-based teams also utilize data analysis within the PLC process, including results from common formative assessments and prior cohort TCAP data, to examine trends across grade levels, cohorts, and individual students. This broader analysis helps ensure instructional expectations are consistent and that individual determinations are made within the context of system-wide instructional practices. For students whose needs cannot be met through Tier 1 instruction with differentiation and accommodations, and whose LRE includes a highly modified special education setting for all or part of the day, instruction may be aligned to alternate academic standards. In these cases, SSS teachers implement district-approved curricula such as TeachTown and Unique Learning Systems, which are aligned to Tennessee state standards, Alternate Academic Achievement (AAD) standards, and DLM Essential Elements. Collectively, these data sources provide the IEP team with a comprehensive understanding of the student's learning profile and support data-based, defensible decisions regarding instructional expectations and participation determinations.

## 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. \* Williamson County Schools would like more guidance on what is the baseline expectation of TDOE for disproportionality. What are some strategies that TDOE has learned from counties around the state in relation to TCAP ALT participation and disproportionality?