



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

APR 15 2019

The Honorable Joy Hofmeister
State Superintendent
Oklahoma State Department of Education
Oliver Hodge Building
2500 North Lincoln Blvd
Oklahoma City, OK 73105

Dear Superintendent Hofmeister:

I am writing in response to the Oklahoma Department of Education's (OSDE) request on December 13, 2018, for an extension of the State's waiver of section 1111(b)(2)(D)(i)(I) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), of the requirement that a State may not assess using an alternate assessment aligned with alternate academic achievement standards (AA-AAAS) more than 1.0 percent of the total number of students in the State. OSDE requested this waiver because, based on State data for the 2017-2018 school year, the OSDE has concluded that it will need to assess more than 1.0 percent of students using an AA-AAAS in the 2018-2019 school year.

After reviewing OSDE's request, I am granting, pursuant to my authority under section 8401(b) of the ESEA, an extension, for school year 2018-2019, of the State's waiver of section 1111(b)(2)(D)(i)(I) of the ESEA so that the State may assess with an AA-AAAS more than 1.0 percent of the total number of students in the State who are assessed in a subject.

As part of this waiver, OSDE assured that the State:

- Will continue to meet all other requirements of section 1111 of the ESEA and implementing regulations with respect to all State-determined academic standards and assessments, including reporting student achievement and school performance, disaggregated by subgroups, to parents and the public.
- Assessed in the prior school year (2017-2018) at least 95 percent of all students and 95 percent of students with disabilities who are enrolled in grades for which an assessment is required.
- Will require that a local educational agency (LEA) submit information justifying the need of the LEA to assess more than 1.0 percent of its assessed students in any such subject with an AA-AAAS.
- Will provide appropriate oversight of an LEA that is required to submit such information to the State, and it will make such information publicly available.
- Will verify that each LEA that is required to submit such information to the State is following all State guidelines in 34 CFR 200.6(d) (with the exception of incorporating principles of universal design) and will address any subgroup disproportionality in the percentage of students taking an AA-AAAS.

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<http://www.ed.gov/>

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

- Will implement, consistent with the plan submitted in OSDE’s waiver request, the system improvements and monitor future administrations to avoid exceeding the 1.0 percent cap.

I note that the State demonstrated substantial progress in carrying out the plan you submitted when originally requesting this waiver. I also note that Oklahoma made some progress in reducing the number and percentage of students taking an AA-AAAS in 2017-2018 compared to 2016-2017. Given the significant work underway, I expect to see continued progress next year in reducing the percentage of students taking the AA-AAAS.

In addition, I want to remind you of the requirement in 34 CFR § 200.6(c)(3)(iv) that the State must make publicly available the information submitted by an LEA justifying the need of the LEA to assess more than 1.0 percent of its students on the AA-AAAS, provided that such information does not reveal personally identifiable information about an individual student. I also encourage you to make available your State’s plan and timeline and your progress to date in reducing the percentage of students taking the AA-AAAS.

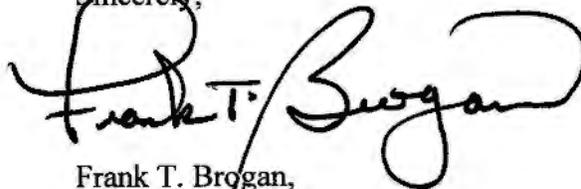
Finally, in order to help all States support implementation of the 1.0 percent participation threshold for AA-AAAS participation, the Department is supporting work by the National Center on Educational Outcomes (NCEO) and the Center on Standards and Assessment Implementation (CSAI) to host three Peer Learning Groups (PLGs):

- Digging into Your Data: Building a One Percent Data Analysis and Use Plan
- Guiding and Evaluating District Justifications for Exceeding the One Percent Cap
- Building Capacity of IEP Teams and Parents in Making Decisions about Assessment Participation

If you have questions about any of these PLGs, please contact Susan Hayes, NCEO at shayes@wested.org or (802) 951-8210.

I appreciate the work you are doing to improve your schools and provide a high-quality education for your students. If you have any questions, please contact Tanesha Hembrey of my staff at OSS.Oklahoma@ed.gov.

Sincerely,

A handwritten signature in black ink that reads "Frank T. Brogan". The signature is written in a cursive style with a large, looped "F" and "B".

Frank T. Brogan,
Assistant Secretary
for Elementary and Secondary Education

cc: Nancy Hughes, Director of Finance, Federal Programs Office

OKLAHOMA STATE DEPARTMENT OF EDUCATION
 ALTERNATE ASSESSMENT PARTICIPATION
 WAIVER REQUEST
 December 10, 2018

If a State anticipates that it will exceed the cap under paragraph (c)(2) of this section with respect to any subject for which assessments are administered under § 200.2(a)(1) in any school year, the State may request that the Secretary waive the cap for the relevant subject, pursuant to section 8401 of the Act, for one year. A state waiver request must:

(i) Be submitted at least 90 days prior to the start of the State's testing window for the relevant subject;

The Oklahoma State Department of Education, Special Education Services (OSDE-SES-SES) division is requesting an extension of the waiver request regarding the 1% cap on participation in the alternate assessment in the subject areas of English language arts, math and science. The waiver request will be submitted to the U.S. Department of Education on December 10, 2018. The alternate assessment testing window opens for all subject areas on March 11, 2019. This waiver extension request will be submitted 90 days prior to the start of the testing window as required.

(ii) Provide State-level data, from the current or previous school year, to show—

(A) The number and percentage of students in each subgroup of students defined in section 1111(c)(2)(A), (B), and (D) of the Act who took the alternate assessment aligned with alternate academic achievement standards; and

Please see the attached excel file for previous school year data showing the number and percentage of students in each subgroup of students defined in section 1111(c)(2)(A), (B), and (D) of the Act who took the alternate assessment aligned with alternate academic achievement standards.

SchoolYear	DistrictName	Subject	OAAP Student Count	Total Students Tested	OAAP Percentage
2018	State Total	MATH	5,107	344,800	1.48%
2018	State Total	READ	5,111	344,486	1.48%
2018	State Total	SCIE	1,640	143,957	1.14%
2017	State Total	MATH	5,840	346,763	1.68%
2017	State Total	READ	5,854	346,316	1.69%
2017	State Total	SCIE	2,167	128,009	1.69%

(B) The State has measured the achievement of at least 95 percent of all students and 95 percent of students in the children with disabilities subgroup under section 1111(c)(2)(C) of the Act who are enrolled in grades for which the assessment is required under § 200.5(a);

Oklahoma follows the federal requirements for participation in statewide assessments outlined in ESSA. All students enrolled in tested subject areas/grades in Oklahoma public schools are assessed either with or without accommodations or with an alternate assessment. The academic achievement of at least 95% of students enrolled in an assessed grade was measured during the 2017-2018 school year as indicated in the tables below.

ELA, Math, and Science

<i>Year</i>	<i>Report Subgroup</i>	<i>Subject Group</i>	<i>Numerator</i>	<i>Denominator</i>	<i>Participation Rate</i>
<i>2016</i>	<i>All</i>	<i>MATH</i>	<i>347476</i>	<i>349703</i>	<i>99.36%</i>
<i>2016</i>	<i>All</i>	<i>READING</i>	<i>343861</i>	<i>345700</i>	<i>99.47%</i>
<i>2016</i>	<i>All</i>	<i>SCIENCE</i>	<i>141442</i>	<i>142730</i>	<i>99.10%</i>
<i>2016</i>	<i>Individual Education Plan</i>	<i>MATH</i>	<i>59845</i>	<i>60649</i>	<i>98.67%</i>
<i>2016</i>	<i>Individual Education Plan</i>	<i>READING</i>	<i>139860</i>	<i>141296</i>	<i>98.98%</i>
<i>2016</i>	<i>Individual Education Plan</i>	<i>SCIENCE</i>	<i>22769</i>	<i>23256</i>	<i>97.91%</i>

(iii) Include assurances from the State that it has verified each LEA that the State anticipates will assess more than 1.0 percent of its assessed students in any subject for which assessments are administered under § 200.2(a)(1) in that school year using an alternate assessment aligned with alternate academic achievement standards—

(A) Followed each of the State's guidelines under paragraph (d) of this section, except paragraph (d)(6); and

(B) Will address any disproportionality in the percentage of students in any subgroup under section 1111(c)(2)(A), (B), or (D) of the Act taking an alternate assessment aligned with alternate academic achievement standards;

An assurance statement regarding the responsibility of IEP teams to follow the alternate assessment participation criteria is gathered annually. The OSDE-SES utilizes an online system to gather these assurance statements from LEA Superintendents before distributing funding. This is a new process implemented this year. An example of the assurance statement has been provided in the screen shot below.

 STATE DEPARTMENT of EDUCATION

Applicant: [Redacted]
 Application: 2017-2018 LEA Agreement - 00-
 Cycle: Original Application
 Submissions due by: 6/30/2018
 Project Period: 7/1/2018 - 6/30/2019

LEA Agreement [X]
 Show History
[Click to Return to Organization Select](#)
[Click to Return to OMS Access/Setup Page](#)
[Click to Return to Show List / Sign Out](#)

The application has been submitted. No more updates will be saved for the application. The page has been marked final by the state agency. You must contact the agency to have it unmarked if legitimate changes are needed.

Overview	Contact Information	Consent/Release	Maintenance of Files	Forms	Agreement	Developmental Data	Specific Learning Difficulties	Personnel Development	Discipline Policies/Procedures	ISBA	Submit	Agreement Print
Agreement Part 1		Agreement Part 2		Agreement Part 3		Agreement Part 4		Agreement Summary				
FAPS		FAPS Part 2		CRIS		WISDOMS		Personnel Development Agreement		Charter Schools		

Participation in Assessments

By checking this box and saving the page, the local education agency (LEA) superintendent hereby certifies that he/she has read, understood and will comply with the assurances listed below.

The LEA assures that it will include students with disabilities in state, districtwide assessments, with appropriate accommodations, as indicated in the student's IEPs, in accordance with 34 CFR § 200.160 and the "Special Education Policies". Students who, even with appropriate accommodations, cannot participate in state, districtwide assessments will participate in the State's alternate assessments. The LEA will establish and implement guidelines for the participation of students with disabilities in districtwide assessments, with appropriate accommodations in administration, if necessary. These guidelines will also address participation of students with disabilities in alternate assessments for those students who cannot participate, even with appropriate accommodations, in standard districtwide assessment programs. The school district assures that only those students who meet the participation criteria identified in the Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments will participate in the Oklahoma Alternate Assessment Program. The school district also assures that IEP teams will complete the Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments as an annual team prior to student participation in the alternate assessment.

34 CFR § 200.160 Participation in Assessments.

(A) General. A State must ensure that all children with disabilities are included in all general State and district-wide assessment programs, including assessments described under section 1111 of the ESEA, 20 U.S.C. 6311, with appropriate accommodations and alternate assessments, if necessary, as indicated in the respective IEPs.

(B) Accommodation guidelines.

(1) A State (or, in the case of a district-wide assessment, an LEA) must develop guidelines for the provision of appropriate accommodations.

(2) The State's (or, in the case of a district-wide assessment, the LEA's) guidelines must:

(i) Identify only those accommodations for each assessment that do not invalidate the score; and

(C) Alternate assessments.

(1) A State (or, in the case of a district-wide assessment, an LEA) must develop and implement alternate assessments and guidelines for the participation of children with disabilities in alternate assessments for those children who cannot participate in regular assessments, even with accommodations, as indicated in their respective IEPs, as provided in paragraph (A) of this section.

(2) For assessing the academic progress of students with disabilities under Title I of the ESEA, the alternate assessments and guidelines in paragraph (C)(1) of this section must provide for alternate assessments that:

(i) Are aligned with the State's challenging academic content standards and challenging student academic achievement standards;

(ii) If the State has adopted modified achievement standards permitted in 34 CFR 200.1(a), measure the achievement of children with disabilities meeting the State's criteria under § 200.1(a)(2) against those standards; and

(iii) If the State has adopted alternate academic achievement standards permitted in 34 CFR 200.1(a), measure the achievement of children with the most significant cognitive disabilities against those standards.

(3) Explanation to IEP Teams. A State (or in the case of a district-wide assessment, an LEA) must provide IEP Teams with a clear explanation of the differences between assessments based on grade-level academic achievement standards and those based on modified or alternate academic achievement standards, including any effects of State and local policies on the student's education resulting from taking an alternate assessment based on alternate academic achievement standards (such as whether only satisfactory performance on a regular assessment would qualify a student for a regular high school diploma).

(4) Inform parents. A State (or in the case of a district-wide assessment, an LEA) must ensure that parents of students selected to be assessed based on alternate academic achievement standards are informed that their child's achievement will be measured based on alternate academic achievement standards.

(5) Reports. An SEA (or, in the case of a district-wide assessment, an LEA) must make available to the public, and report in the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children, the following:

(1) The number of children with disabilities participating in regular assessments, and the number of those children who were provided accommodations (that did not result in an invalid score) on those assessments;

(2) The number of children with disabilities, if any, participating in alternate assessments based on grade-level academic achievement standards;

(3) The number of children with disabilities, if any, participating in alternate assessments based on modified academic achievement standards;

(4) The number of children with disabilities, if any, participating in alternate assessments based on alternate academic achievement standards;

(5) Compared with the achievement of all children, including children with disabilities, the performance results of children with disabilities on regular assessments, alternate assessments based on grade-level academic achievement standards, alternate assessments based on modified academic achievement standards, and alternate assessments based on alternate academic achievement standards if:

(i) The number of children participating in those assessments is sufficient to yield statistically reliable information; and

(ii) Reporting that information will not reveal personally identifiable information about an individual student on those assessments.

(6) Universal design. An SEA (or, in the case of a district-wide assessment, an LEA) must, to extent possible, use universal design principles in developing and administering any assessments under this section. (Authority: 20 U.S.C. 1412(a)(1)(E))

The OSDE-SES-SES will continue to address disproportionality in the percentage of students in any subgroup taking the alternate assessment by completing the following activities:

- Providing professional development for the participation guidelines for Oklahoma's alternate assessment;
- Providing 2017-18 alternate assessment participation rates to school LEAs;
- Completing a disproportionality analysis of alternate assessment data by subgroup, such as race/ethnicity, gender, English learner and students eligible for free or reduced price school meals;
- Addressing disproportionalities in subgroups within LEAs through a 3 tier intervention/support system

(iv) Include a plan and timeline by which—

(A) The State will improve the implementation of its guidelines under paragraph (d) of this section, including by reviewing and, if necessary, revising its definition under paragraph (d)(1), so that the State meets the cap in paragraph (c)(2) of this section in each subject for which assessments are administered under § 200.2(a)(1) in future school years;

The OSDE-SES worked in conjunction with three groups of stakeholders during the 2017-18 school year to develop a state definition of a student with a significant cognitive disability:

Students with significant cognitive disabilities have limited conceptual skills, written language skills, and understanding of numerical concepts such as quantity, time, and money. Vocabulary and grammar are quite limited and augmentative communication devices are often necessary to communicate with others. They tend to focus on present, everyday events and rarely attempt to analyze or expand on new ideas and concepts through spoken language. Skill acquisition and generalization in all areas requires intensive direct instruction and repetition across multiple settings. These individuals require extensive support for all activities of daily living including meal

preparation, dressing, grooming, and personal hygiene. Their personal safety is dependent upon constant supervision and will be a concern throughout their lifetime.

The definition has been included in the required professional development module regarding the alternate assessment participation criteria. The alternate assessment participation criteria information in the module focuses on factors related to cognitive functioning and adaptive behavior. The OSDE-SES will continue to provide professional learning opportunities for IEP team members and other educators regarding eligibility for participation in the alternate assessment.

The following timeline identifies steps to be taken by the OSDE-SES:

- Public comment period from November 6, 2018 – December 6, 2018;
- Analysis of public comments from December 7 – 9, 2018;
- Waiver request submitted to the U.S. Department of Education on December 10, 2018;
- OSDE-SES assessment monitoring – December 2018 through February 2019
- Launch of online professional development module – January 2019
- Alternate assessment testing window opens for all subject areas on March 11, 2019.

(B) The State will take additional steps to support and provide appropriate oversight to each LEA that the State anticipates will assess more than 1.0 percent of its assessed students in a given subject in a school year using an alternate assessment aligned with alternate academic achievement standards to ensure that only students with the most significant cognitive disabilities take an alternate assessment aligned with alternate academic achievement standards. The State must describe how it will monitor and regularly evaluate each such LEA to ensure that the LEA provides sufficient training such that school staff who participate as members of an IEP team or other placement team understand and implement the guidelines established by the State under paragraph (d) of this section so that all students are appropriately assessed; and

(C) The State will address any disproportionality in the percentage of students taking an alternate assessment aligned with alternate academic achievement standards as identified through the data provided in accordance with paragraph (c)(4)(ii)(A) of this section;

Oklahoma provided regional professional development workshops during the 2017-18 school year regarding the participation criteria found in the Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments. The trainings focused on how to analyze the criteria found in the checklist and how to choose the appropriate state assessment. In addition, the following 3 Tiered Intervention/Support Monitoring system was implemented.

Tier 1: LEAs slightly to moderately over the 1 percent participation cap were required to provide justification for assessing more than 1% with an alternate assessment and an assurance statement regarding following the alternate assessment eligibility criteria. The following professional development opportunities were offered:

- Regional professional development workshops
- Technical support and guidance consisting of phone support and small group/individual training sessions.

Concepts covered in these supports included:

- Using the Participation Guidelines to make assessment participation decisions;
- Helping fellow IEP team members understand the criteria for participation in the alternate assessment;
- Selecting, implementing and evaluating accessibility features and accommodations for instruction and assessments;
- Having high expectations for all students regardless of the severity of disability;
- Understanding and communicating to parents the implications of student participation in the alternate assessment.

Tier 2: LEAs moderately over the 1 percent participation cap were required to provide justification for assessing more than 1% with an alternate assessment and an assurance statement regarding following the alternate assessment eligibility criteria. The following professional development opportunities were offered:

- Regional professional development workshops
- Technical support and guidance consisting of phone support and small group/individual training sessions.

Concepts covered in these supports included:

- Using the Participation Guidelines to make assessment participation decisions;
- Helping fellow IEP team members understand the criteria for participation in the alternate assessment;
- Selecting, implementing and evaluating accessibility features and accommodations for instruction and assessments;
- Having high expectations for all students regardless of the severity of disability;
- Understanding and communicating to parents the implications of student participation in the alternate assessment.

In addition to the optional supports provided above, completion of an online professional development module will be required this Fall. OSDE-SES is in the final stages of completion of the module which will be launched at the end of November 2018. This module will be available to all LEAs but will be required of Tier 2 LEAs.

Tier 3: Tier 3 intervention/support were provided to LEAs significantly over the 1 percent participation cap. Tier 3 interventions/supports consisted of all Tier 2 requirements and the following additional activities:

- Additional data analysis;
- Comprehensive assessment monitoring;
- Required support/training for LEA leadership;

Upon a comprehensive review of the last two years of assessment data for all tier 3 LEAs, OSDE-SES has determined that approximately 12 LEAs will be visited during the 2018-19 school year. The data analysis began with looking at LEAs who assessed more than 5% of the tested population with an alternate assessment during the 2017 school year. The size of the total student population was taken into account as well as the existence of any special schools or long-term residential facilities for medically fragile children with severe/profound disabilities. IEPs in LEAs with

higher percentages of students assessed with the alternate assessment were reviewed with a focus on cognitive and adaptive behavior testing data and categorical identification under the IDEA. The OSDE-SES does not promote the idea that certain disability categories deem a student ineligible for an alternate assessment, however the data can help monitoring staff develop a better understanding of the professional development needs in the LEA. The OSDE-SES then compared data from the 2017 and 2018 testing seasons as soon as the newest data became available in October 2018. The analysis of two years of assessment data indicates that many of our more concerning LEAs have decreased the number of students assessed via the alternate assessment. The OSDE-SES feels that the data analysis performed has resulted in the need to perform a comprehensive assessment monitoring of 12 LEAs which will include file reviews and required training for LEA leadership and special education staff.

Although Oklahoma continues to exceed the 1% cap, substantial progress has been made in lowering the percentage of students assessed with the alternate assessment. Justifications for overages and assurances submitted by Superintendents and supports such as regional trainings did have a positive impact on the percentage of students assessed with the alternate assessment. The chart below demonstrates the decrease in the percentage of students alternately assessed in Oklahoma in the last year. A future LEA incentive for adherence to the 1% cap will include the addition of a bonus point in the district data profile calculation.

SchoolYear	Education	Subject	ReportGroup	ReportSubgroup	OAAPStudentCount
2018	State	MATH	All	All	5,747
2018	State	MATH	Economic	Economically Disadvantaged	4,396
2018	State	MATH	Economic	Not EconomicDisadvantage	1,351
2018	State	MATH	Gender	Female	1,991
2018	State	MATH	Gender	Male	3,756
2018	State	MATH	Homeless	Homeless	182
2018	State	MATH	Homeless	Non Homeless	5,565
2018	State	MATH	Language	English Language Learner	536
2018	State	MATH	Language	Not ELL	5,211
2018	State	MATH	Migrant	Non Migrant	5,747
2018	State	MATH	Race	American Indian	800
2018	State	MATH	Race	Asian	88
2018	State	MATH	Race	Black	764
2018	State	MATH	Race	Hispanic	824
2018	State	MATH	Race	Other	528
2018	State	MATH	Race	Pacific Islander	15
2018	State	MATH	Race	White	2,728
2018	State	READING	All	All	5,759
2018	State	READING	Economic	Economically Disadvantaged	4,401
2018	State	READING	Economic	Not EconomicDisadvantage	1,358
2018	State	READING	Gender	Female	1,997
2018	State	READING	Gender	Male	3,762
2018	State	READING	Homeless	Homeless	182
2018	State	READING	Homeless	Non Homeless	5,577
2018	State	READING	Language	English Language Learner	537
2018	State	READING	Language	Not ELL	5,222
2018	State	READING	Migrant	Non Migrant	5,759
2018	State	READING	Race	American Indian	803
2018	State	READING	Race	Asian	88
2018	State	READING	Race	Black	767
2018	State	READING	Race	Hispanic	825
2018	State	READING	Race	Other	532
2018	State	READING	Race	Pacific Islander	15
2018	State	READING	Race	White	2,729
2018	State	SCIENCE	All	All	2,293
2018	State	SCIENCE	Economic	Economically Disadvantaged	1,749
2018	State	SCIENCE	Economic	Not EconomicDisadvantage	544
2018	State	SCIENCE	Gender	Female	807
2018	State	SCIENCE	Gender	Male	1,486
2018	State	SCIENCE	Homeless	Homeless	69
2018	State	SCIENCE	Homeless	Non Homeless	2,224
2018	State	SCIENCE	Language	English Language Learner	173
2018	State	SCIENCE	Language	Not ELL	2,120
2018	State	SCIENCE	Migrant	Non Migrant	2,293
2018	State	SCIENCE	Race	American Indian	339
2018	State	SCIENCE	Race	Asian	35

2018 State	SCIENCE	Race	Black	318
2018 State	SCIENCE	Race	Hispanic	294
2018 State	SCIENCE	Race	Other	190
2018 State	SCIENCE	Race	Pacific Islander	*
2018 State	SCIENCE	Race	White	1,112

TotalStudentsTe: OAAPPpercentage

345,792	1.66%
221,263	1.99%
124,529	1.08%
169,088	1.18%
176,704	2.13%
9,253	1.97%
336,539	1.65%
25,245	2.12%
320,547	1.63%
345,792	1.66%
47,110	1.70%
6,979	1.26%
29,660	2.58%
60,916	1.35%
31,952	1.65%
1,179	1.27%
167,996	1.62%
345,476	1.67%
221,099	1.99%
124,377	1.09%
169,098	1.18%
176,378	2.13%
9,246	1.97%
336,230	1.66%
25,208	2.13%
320,268	1.63%
345,476	1.67%
47,076	1.71%
6,956	1.27%
29,592	2.59%
60,875	1.36%
31,931	1.67%
1,174	1.28%
167,872	1.63%
144,879	1.58%
88,397	1.98%
56,482	0.96%
70,878	1.14%
74,001	2.01%
3,525	1.96%
141,354	1.57%
8,050	2.15%
136,829	1.55%
144,879	1.58%
20,196	1.68%
3,135	1.12%

12,461	2.55%
24,753	1.19%
12,533	1.52%
472	* * - denotes suppressed value
71,329	1.56%

Data Dictionary

Column Name	Definition
SchoolYear	School year that the data are from
EducationAgencyType	Identifies whether aggregation is at the state, district, or school level
Subject	Assessment Subject
ReportGroup	Demographic
ReportSubgroup	Sub Demographic Category
OAAPStudentCount	OAAP Student Count (Alternate Assessment)
TotalStudentsTested	Overall Student Count
OAAPPercentage	OAAP Student Count / Overall Student Count

Course Title: Criteria for Alternate Assessment Participation

Individual Name/Organization: OSDE

Contact Name: Christie Stephenson

Phone: 405-522-3246

Alt Phone: _____

Address: _____

City/State/Zip: _____

Email: Christie.Stephenson@sde.ok.gov

Course Title: Criteria for Alternate Assessment Participation

Course Number: _____

Author: Christie Stephenson

Original Submission Date: _____

OSDE Representative: _____

Edit Resubmission Date: _____

OSDE Approved Date of Completion: _____

Criteria for Alternate Assessment Participation

1.1.1 Introduction of Participation Criteria for Alternate Assessment

Welcome to the Participation Criteria for Alternate Assessment course. In this course, you will learn about the purpose of an alternate assessment and the importance of making appropriate assessment decisions. The course is designed to provide clarity regarding identification of the group of students for whom alternate assessments were intended.

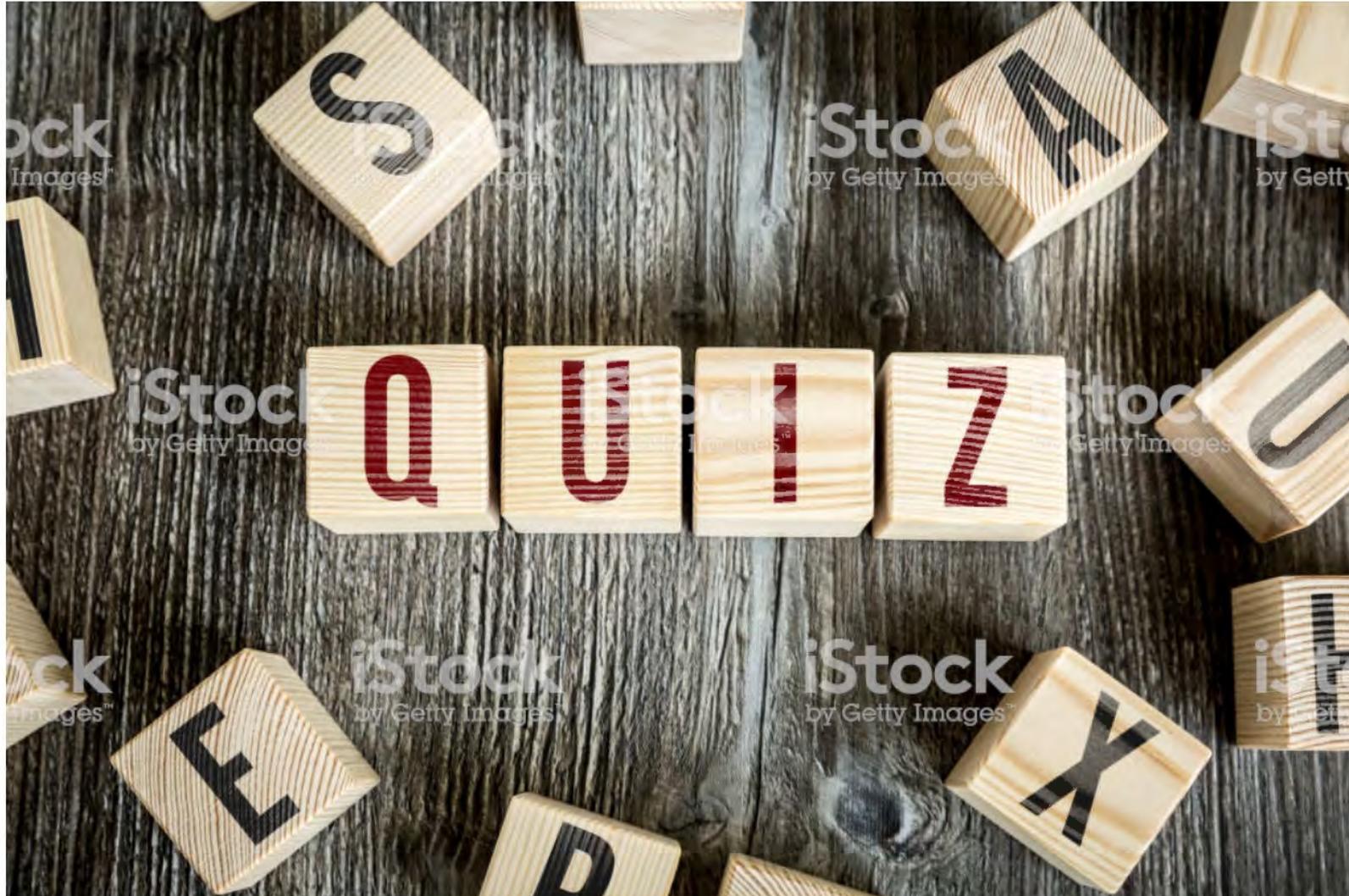


1.1.2 Course Objectives

Participants in this course will learn about:

- The purpose of an alternate assessment system.
- Which students should be assessed through the Oklahoma Alternate Assessment Program (OAAP).
- The questions in the Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments
- Oklahoma's definition of a Student with a Significant Cognitive Disability (SWSCD) when making assessment decisions.

1.1.3 – Check for Knowledge



1.1.4 Pre-Test

1. A student who does fine in core subjects but is unable to read can participate in the OAAP. T or F
2. A student's ability to score proficient on a general assessment should be a factor when the IEP team is determining the appropriate assessment. T or F
3. A student must have BOTH significant intellectual disabilities AND significant adaptive behavior deficits to meet eligibility for the OAAP. T or F
4. A student participating in the OAAP requires intensive and extensive direct instruction in multiple settings to acquire, maintain, generalize and demonstrate knowledge of skills. T or F
5. The IEP of a student participating in the OAAP does not have to contain short term benchmarks/objectives in addition to annual goals. T or F
6. Extensive family/community supports will be a lifelong requirement for students participating in the OAAP regardless of modifications, accommodations or adaptations implemented in the student's program.
7. Students must be categorized as Intellectually Disabled in order to take an alternate assessment. T or F
8. Students can participate in a general education classroom and also take an alternate assessment. T or F

2.1 - Alternate assessments and how they are used.



2.1.1 – What is an alternate assessment?

Alternate assessments are assessments used to evaluate the performance of students who are unable to participate in general state assessments even with accommodations. They are aligned to grade-level content, but define proficiency through alternate achievement standards.

2.1.2 – Purpose of an Alternate Assessment

Alternate assessments are used for many reasons. For instance, they are used to inform classroom instruction and for federal and state accountability systems. Alternate assessments should only be given to students with the most significant cognitive disabilities. They are given instead of the general assessment with or without accommodations when deemed appropriate by the IEP team and if students meet the participation criteria. Alternate assessments provide an avenue for students with the most significant cognitive disabilities to be included in educational accountability systems.

2.1.3– Oklahoma’s Alternate Assessment System



Oklahoma offers alternate assessments through the Oklahoma Alternate Assessment Program (OAAP).

The OAAP utilizes the Dynamic Learning Maps (DLM) Alternate Assessment system in the areas of English Language Arts, Math, Science, and high school US History.

Let’s watch a short [video](#) about the Dynamic Learning Maps (DLM) Alternate Assessment System.

2.1.4 – Check for Knowledge



2.1.5

1. Alternate assessments are given instead of the general assessment with or without accommodations when deemed appropriate by the IEP team and if students meet the participation criteria. T or F
2. Alternate assessments are used to place students with disabilities in special education. T or F
3. The DLM alternate assessment system is available under the umbrella of the OAAP. T or F
4. Alternate assessments are aligned to grade-level content, but define proficiency through alternate achievement standards. T or F

3.1 - Which students should be assessed through the OAAP?



3.1.1 – IEP team decision

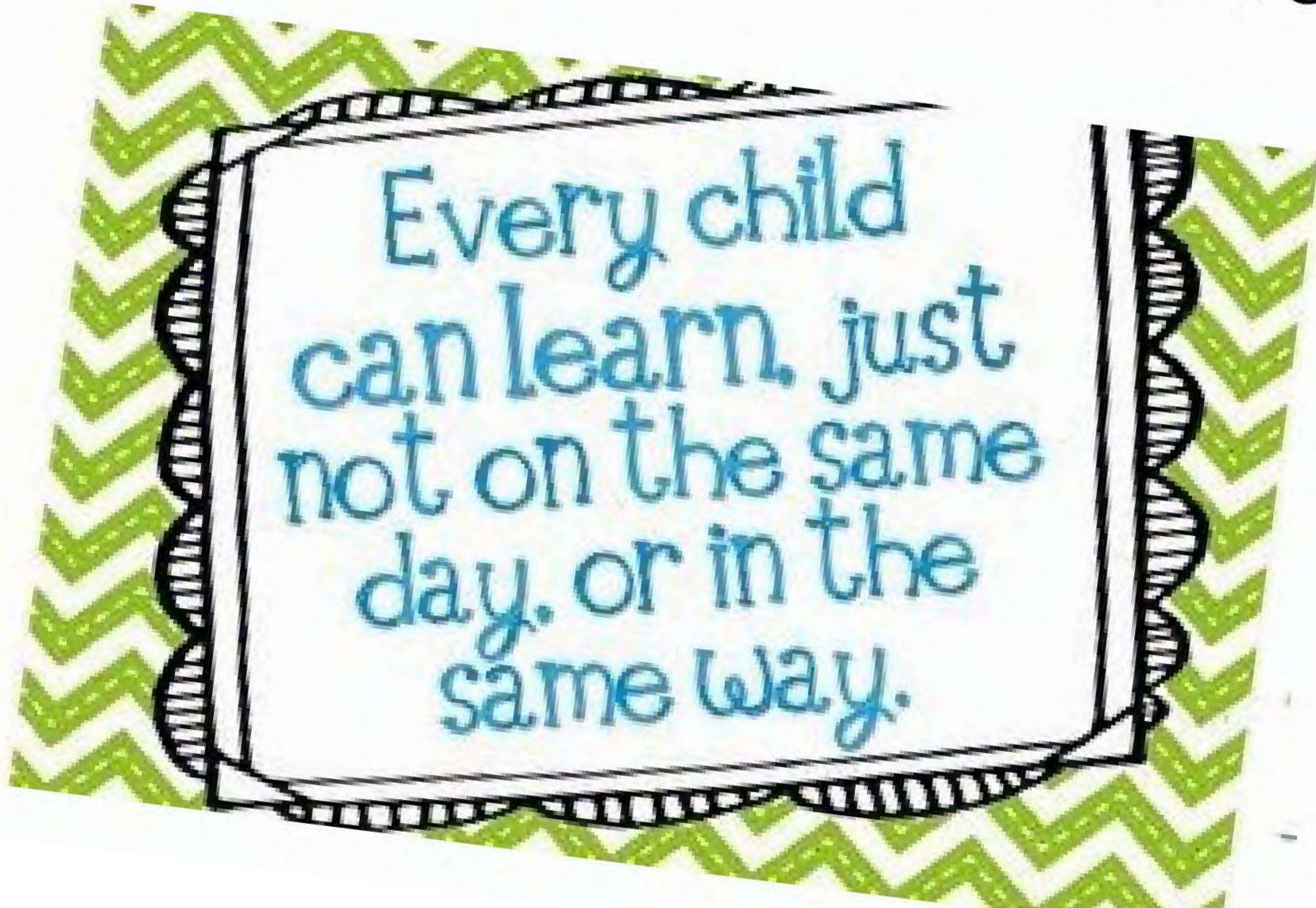
The IEP team must determine which type of assessment is the most appropriate for the student. This decision must be made on an annual basis and students must meet the participation criteria in the *Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments* before participating in the alternate assessment.

3.1.2 – Assessment type is an individualized decision.



Neither disability category nor placement should determine the assessment type chosen by the IEP team. Students with the most significant cognitive disabilities should be educated in the general education classroom whenever possible. A self-contained setting is not a prerequisite nor a requirement of an alternate assessment as demonstrated in this short video sponsored by PBS Learning Media.

4.1 Students with Significant Cognitive Disabilities



Every child
can learn, just
not on the same
day, or in the
same way.

4.1.1 – High Expectations

It's important to remember that students with significant cognitive disabilities are able to learn academic content just as other students do. However, they may learn at a much slower pace and may require some form of assistive technology to participate in choice making and communicate with others. Let's take a look at how Isabelle participates in choice making in this video provided by the Dynamic Learning Maps Alternate Assessment System.

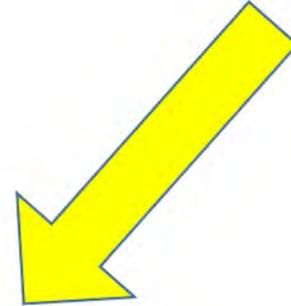
4.1.2 – Part of the Participation Criteria



Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments

Name:

State Testing Number:



The OAAP Portfolio Assessment is intended for a very small population of students with the **most significant cognitive disabilities**. Due to the severity of the cognitive disabilities of this population of students, alternate achievement of the content standards is required in daily instruction as well as statewide assessment and the performance expectations aligned with the statewide general assessment are not appropriate even with the accommodations. Assessment decisions are made on an annual basis by the IEP team and students must meet certain criteria to be eligible for an alternate assessment. **Students who do not meet the eligibility criteria below SHOULD NOT take the alternate assessment.**

4.1.3 – Oklahoma's definition of a *Student with a Significant Cognitive Disability*

- Limited conceptual skills, written language skills, and understanding of numerical concepts such as quantity, time, and money.
- Vocabulary and grammar are quite limited and augmentative communication devices are often necessary to communicate with others.
- Focus on present, everyday events and rarely attempt to analyze or expand on new ideas and concepts through spoken language.
- Skill acquisition and generalization in all areas requires intensive direct instruction and repetition across multiple settings.
- Require extensive support for all activities of daily living including meal preparation, dressing, grooming, and personal hygiene.
- Personal safety is dependent upon constant supervision and will be a concern throughout their lifetime.

4.1.4 Check for Knowledge



4.1.5

1. The IEP team must decide if an alternate assessment is appropriate for the student at least once between the grades of K-12. T or F
2. A student has to meet the definition of a *Student with Significant Cognitive Disability* in order to be assessed with the alternate assessment. T or F
3. Students must meet the participation criteria in the *Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments* before participating in the alternate assessment. T or F
4. Students may not take an alternate assessment if they are educated in a general education classroom. T or F
5. It is appropriate to have high expectations of students with significant cognitive disabilities regarding academic content. Tor F

5.1.1 – Question 1

Does the student have significant intellectual disabilities AND significant adaptive behavior deficits?

- This is a two part question and both parts must be answered “yes” in order for a student to meet the participation criteria.
- Current and comprehensive adaptive behavior data should be used when making the assessment decision.
- Adaptive behavior data should be available for all domains of the Adaptive Behavior Scale in order to be considered comprehensive.

5.1.2 – Question 2

Does the student's IEP require alternate achievement standards in ALL content areas?

- Must require alternate achievement standards in ALL content areas.
- Present Levels of Performance (PLOP) indicate severe/profound disability.
- Accommodations/Modifications and Related/Supplementary Services indicate a severe disability and the need for intensive supports.

Let's take a look at how Hunter participates in writing in this video provided by the Dynamic Learning Maps Alternate Assessment System. Notice that Hunter is not performing writing tasks as advanced as what his same age peers are performing. However, he is participating in writing activities that can easily be tied to his grade level content standards. It's important to note that due to the severity of Hunter's disability, he requires this level of support in all areas.

5.1.3 – Question 3

Does the IEP team feel extensive family/community supports will be a lifelong requirement, regardless of modifications, accommodations or adaptations implemented in the student's program?

- Significant adaptive behavior deficits are evident.
- Student will need various supports throughout their lives and will most likely never be independent.

Let's take a [peek](#) at Victoria's life and the daily supports that are necessary for her to function in the adult world.

5.1.4 – Question 4

Does the student require intensive and extensive direct instruction in multiple settings to acquire, maintain, generalize and demonstrate knowledge of skills?

- Frequent repetition is necessary to learn new skills.
- Low intellectual functioning dictates the need for practice in multiple settings to generalize knowledge.

5.1.5 – Question 5

The decision to place the student on an alternate assessment is based on the severity of the student's disability and NOT on excessive absences, language, social, cultural, or economic differences, OR administration reasons such as the student is expected to perform poorly on the regular assessment, the student displays disruptive behaviors, or the student experiences emotional distress during testing.

- The student's ability to take the general assessment is **NOT** part of the participation criteria and cannot influence the IEP teams' decision regarding assessment type.

5.1.6 – Check for Knowledge



5.1.7 Post-Test

1. A student who does fine in core subjects but is unable to read can participate in the OAAP. T or F
2. A student's ability to score proficient on a general assessment should be a factor when the IEP team is determining the appropriate assessment. T or F
3. A student must have BOTH significant intellectual disabilities AND significant adaptive behavior deficits to meet eligibility for the OAAP. T or F
4. A student participating in the OAAP requires intensive and extensive direct instruction in multiple settings to acquire, maintain, generalize and demonstrate knowledge of skills. T or F
5. The IEP of a student participating in the OAAP does not have to contain short term benchmarks/objectives in addition to annual goals. T or F
6. Extensive family/community supports will be a lifelong requirement for students participating in the OAAP regardless of modifications, accommodations or adaptations implemented in the student's program.
7. Students must be categorized as Intellectually Disabled in order to take an alternate assessment. T or F
8. Students can participate in a general education classroom and also take an alternate assessment. T or F

Summary

Thank you for completing the Criteria for Alternate Assessment Participation course. In this course, you learned about the purpose of an alternate assessment, which students should be assessed through the Oklahoma Alternate Assessment Program (OAAP), OAAP participation criteria, and Oklahoma's definition of significant cognitive disability.

SCHOOL DISTRICT/AGENCY: sample

SY: 18-19 DATE: //

Districts must utilize a team of staff members to complete this corrective action plan, including the root cause analysis. Documentation for the completion of the following activities must be submitted to: //

Student Level Corrective Actions (must be completed within 30 School days)

The following corrective actions must be taken for students identified in the Compliance Report:

This area is for child-specific corrections, such as revising an IEP, conducting a reevaluation, etc to be compliant with the IDEA.

District Level Corrective Action (must be completed within 60 Calendar days)

The following corrective actions must be taken:

This area always includes the completion of the root cause analysis on the next page and an assurance statement signed by the local superintendent and local school board members. It may also (and normally does) include required professional development (assigning PD to teachers, administrators, or other staff - or all staff) and the revision of policies/procedures.



Root Cause Analysis

To complete this analysis, focus on the things you can control in your district.

Problem - Formalize the problem and describe it completely. (i.e. *Why IDEA compliance was not achieved.*)

Why did this occur? – Determine what happened to cause the problem.

Is this a root cause? – Determine whether this is a symptom or root cause.

Counter measure – The action or set of actions that will prevent the problem arising again.

Problem:

Why did this occur (1)?	Root Cause? <input type="checkbox"/> No <input type="checkbox"/> Yes	Counter Measure:
Why did this occur (2)?	Root Cause? <input type="checkbox"/> No <input type="checkbox"/> Yes	
Why did this occur (3)?	Root Cause? <input type="checkbox"/> No <input type="checkbox"/> Yes	
Why did this occur (4)?	Root Cause? <input type="checkbox"/> No <input type="checkbox"/> Yes	
Why did this occur (5)?	Root Cause? <input type="checkbox"/> No <input type="checkbox"/> Yes	

Attach additional pages as needed.



LEA Personnel Responsible for Implementation:

Name		Signature		Date	
Position					
Name		Signature		Date	
Position					
Name		Signature		Date	
Position					
Name		Signature		Date	
Position					
Name		Signature		Date	
Position					

OSDE USE ONLY

This office has received documentation for each required corrective action:

YES / NO

Date Received:

OSDE-SES Reviewers:

Name		Signature		Date	
Position					

Name		Signature		Date	
Position					

Public Comment:

On December 13, 2018, Oklahoma requested an extension of its waiver of section 1111(b)(2)(D)(i)(I) of the ESEA of the requirement that a State may not assess using an AA-AAAS more than 1.0 percent of the total number of students in the State who are assessed in reading/language arts, mathematics, and science (attached). Prior to submitting the waiver extension request, OSDE posted a notice of intent to request a waiver on its website and disseminated the information on the notice of intent including a call for public comment on December 6, 2018, during both a monthly regional directors meeting and an IDEA B State Advisory Panel meeting. OSDE provided the public an opportunity to comment on the request and notified the public about the request by posting it on the website for several weeks but reported that it did not receive any comments.