



Indiana 1 Percent Cap Waiver Extension Request

ESEA §111(b)(2)(D) and 34 CFR 200.6(c) and (d)

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Special Education, Assessment and Accountability

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INTRODUCTION

Title 1 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act of 2015 (ESSA) [ESEA §111(b)(2)(D) and 34 CFR 200.6(c) and (d)], modifies the provision that students with the most significant cognitive disabilities may participate in alternate assessments based on alternate academic achievement standards (Content Connectors). The Indiana Department of Education (IDOE)'s alternate assessment is titled Indiana's Alternate Measure (I AM).

ESSA places a 1 Percent Cap on the number of students who may participate in alternate assessments. States that anticipate exceeding the 1 Percent Cap must submit a waiver request or waiver extension request to the U.S. Department of Education (USED).

2016-2017: The alternate assessment participation rates for 2016-2017, submitted in our original waiver, were 1.25% for English/Language Arts (ELA) and Mathematics, and 1.30% for Science. Based on this data, IDOE anticipated exceeding the 1 Percent Cap for the 2017-2018 alternate assessment administration in ELA, Mathematics, and Science, and submitted the required waiver request on October 16, 2017. USED requested revisions to the original waiver request surrounding high school science, resulting in IDOE submitting an addendum dated January 23, 2018. On May 7, 2018, IDOE received notification that USED had granted Indiana a waiver of section 1111(b)(2)(D)(i)(I) of the ESEA, allowing the State to assess more than 1.0% of the total number of students assessed in ELA, Mathematics, but not Science on the alternate assessment.

2017-2018: The alternate assessment participation rates for 2017-2018, included in our waiver extension, are 1.21% for ELA) and Mathematics and 1.26% for Science. IDOE anticipated exceeding the 1 Percent Cap for the 2018-2019 alternate assessment administration in ELA, Mathematics, and Science, and submitted the required waiver extension request on December 21, 2018. On April 15, 2019, IDOE received notification that USED had granted Indiana a waiver of section 1111(b)(2)(D)(i)(I) of the ESEA, allowing the State to assess more than 1.0% of the total number of students assessed in ELA, Mathematics, and Science on the alternate assessment.

2018-2019: Alternate assessment participation rates for 2018-2019 were 1.14% for ELA, Mathematics, and Science. Based on this data, IDOE anticipates exceeding the 1 Percent Cap for the 2019-2020 alternate assessment administration in ELA, Mathematics, and Science. Therefore, IDOE is submitting the required waiver extension request. This Indiana 1 Percent Cap Waiver Extension Request documents that IDOE complied with all assurances outlined in IDOE's original waiver.

Multiple electronic resources are referenced as evidence of activities and requirements, and are accessible online. Web links to these resources are embedded in the text of this document, allowing the reader to link directly to content-specific support documents.

1 PERCENT WAIVER EXTENSION REQUEST REQUIREMENTS

Requirement 5 (§200.6(c)(4)(v)): Substantial Progress

IDOE has made substantial progress toward meeting the 1 Percent Cap on alternate assessment participation since its original waiver was submitted and approved. This progress is evident in alternate assessment participation data and completion of State Plan and Timeline activities outlined in last year’s waiver request. A comparison of 2016-2017, 2017-2018, and 2018-2019 confirms Indiana’s progress toward reducing the number of students participating in the alternate assessment. [Table 1](#) illustrates the reduction of the number of Local Education Agencies (LEAs) exceeding the 1 Percent Cap across content areas. [Table 2](#) illustrates the reduction in alternate assessment participation rates across content areas.

Table 1: Comparison of the Number of LEAs Exceeding the 1% Cap from 2016-2017 to 2018-2019

Content Area	Number of LEAs Exceeding 1% Cap in 2016-2017	Number of LEAs Exceeding 1% Cap in 2017-2018	Number of LEAs Exceeding 1% Cap in 2018-2019	Difference Between 2017-2018 and 2018-2019
ELA	190	186	166	-16.16%
Mathematics	189	186	165	-16.67%
Science	183	183	153	-22.34%

Table 2: Comparison of Alternate Assessment (AA) Participation Rates from 2016-2017 to 2018-2019

Content Area	AA Participation Rate 2016-2017	AA Participation Rate 2017-2018	AA Participation Rate 2018-2019	Difference Between 2017-2018 and 2018-2019
ELA	1.25%	1.21%	1.14%	-0.07%
Mathematics	1.25%	1.21%	1.14%	-0.07%
Science	1.30%	1.26%	1.14%	-0.12%

Summary of State Plan and Timeline Activities: Outlined below is a summary of personnel and activities that address exceeding the 1 Percent Cap on alternate assessment participation.

Office of Student Assessment-Accessibility Specialist: This specialist focuses on accessibility for all students and provides guidance to the field regarding accommodations on all Indiana assessments.

Office of Student Assessment (OSA)-Alternate Assessment Specialist: This specialist oversees the alternate assessment (I AM) and works as the assessment liaison to the Office of Special Education (OSE).

OSE-Senior Special Education Specialist: The senior specialist was the special education liaison to the OSA) until August, 2019. From January to August, 2019 this position led the efforts related to the 1 Percent Cap on participation on the alternate assessment, the Indiana Inclusive Communication Matters (IICM) community of practice, the Indiana Resource Network (IRN) resource centers and is a monitoring team member involved in Indiana's Results Driven Accountability (RDA) system.

OSE-Intense Interventionist Specialist: The intense interventionist specialist is the special education liaison to the OSA starting August, 2019. This position now leads the efforts related to the 1% Cap on participation on the alternate assessment, IICM, and is a monitoring team member involved in Indiana's RDA system.

Multi-State Collaborative Groups: IDOE participated in the National Center on Educational Outcomes 1 Percent Cap Community of Practice webinars. IDOE was also involved in one of the Council of Chief State School Officers (CCSSO) State Collaborative on Assessment and Student Standards (SCASS) Assessing Special Education Students (ASES) meetings.

Stakeholder Feedback: IDOE has shared information, collaborated, and sought feedback from stakeholders regarding the 1 Percent Cap on alternate assessment participation. Stakeholders included LEAs, IRNs, Indiana's Parent and Training Information Center (INSOURCE), and OSA's Technical Advisory Committee (TAC). IDOE is committed to educating stakeholders about alternate assessment participation issues and ensuring that only those students with the most significant intellectual impairments in Indiana participate in the alternate assessment.

Alternate Assessment Updates and Information Training

- A [training webinar](#) concerning the federal regulations of the 1 Percent Cap on participation in the alternate assessment was provided to LEAs, as well as publicly posted on IDOE's Alternate Assessment ESSA 1 Percent Cap [website](#). In this presentation, information was shared related to the federal alternate assessment 1 Percent Cap requirements and participation criteria. Information about the 1 Percent Cap was shared in the January 25, 2019 edition of OSE's *From the Director* newsletter and the February 4, 2019 I AM listserv message to Corporation Test Coordinators (CTCs). An updated training webinar will be available to LEAs in January 2020.
- Information regarding the 1 Percent Cap was shared at both of the Indiana Council of Administrators of Special Education (ICASE) bi-annual meetings by the OSE Director during her presentation to special education directors and their staff from across the state. These PowerPoint presentations are posted on OSE's Moodle community, which is a communication portal used by OSE to share and relate information to educators.

Accommodations and Accessibility Features Embedded in Webinars: IDOE provided guidance on how students with disabilities participate in Indiana assessments to Test Coordinators, school counselors/administrators, and general and special education personnel. Webinar topics included universal accessibility tools, embedded and non-embedded accommodations available to students, and information regarding the alternate assessment options for students with the most significant intellectual disabilities.

Statewide Assessment Webpage Revision: OSA's [website](#) and [Indiana Assessment Portal](#) houses information, resources, training materials, and web links for special education professionals supporting students with disabilities. The webpage and portal are both updated regularly to provide the field with the most relevant information regarding Indiana's alternate assessment, I AM.

Pretest Workshops for CTCs: Live and recorded webinars were offered to CTCs in preparation for the 2019 spring assessment administration. During these trainings, the criteria for participation in I AM was discussed to ensure the appropriate students participate. Participation in Pretest Workshops is an annual requirement for CTCs.

Test Administration Certification and Training: IDOE and the testing delivery vendor, American Institutes for Research (AIR), delivered 20 live I AM trainings in 15 different locations across the state during February and March of 2019. Test Administrators (TAs) preparing to administer I AM were required to attend one of these live sessions. If unable to attend, and approved by their CTC and IDOE, TAs could also complete a Moodle certification course or view a live stream of one of the training sessions. The Alternate Assessment Specialist was involved in the planning, content, and delivery of all trainings associated with the alternate assessment.

Exceeding the 1 Percent Cap Webinar Series: IDOE developed and presented three webinars related to the 1 Percent Cap.

- The [Alternate Assessment Participation Webinar](#) was mandatory for special education directors from the LEAs that exceeded the 1 Percent Cap on alternate assessment participation in 2017-2018 for ELA, Mathematics, and/or Science and was publicly posted on IDOE's website. In January of 2019, applicable Special Education Directors, Superintendents, and CTCs received a link to the 1 Percent Cap Webinar, alternate assessment participation rates in content areas, and disproportionality data. IDOE offered support to LEAs exceeding the 1 Percent Cap during the webinar. The webinar addressed the topics and issues listed below:
 - Background and context about the 1 Percent Cap on alternate assessment participation
 - Indiana's alternate assessment participation rates
 - Requirements of the 1% Cap waiver request
 - The requirement that LEAs provide assurance that they are following alternate assessment participation criteria and justification for exceeding the 1 Percent Cap

- Timeline for waiver activities
- The [ESSA 1% Cap on Alternate Assessment LEA Data Webinar](#) was voluntary for special education directors from all LEAs and was publicly posted on IDOE's website. The webinar addressed the topics and issues listed below:
 - How to calculate alternate assessment rates, including specific instructions on how to determine a student's corporation
 - How to use the electronic Individualized Education Program (IEP) system to run reports related to alternate assessment data
 - How to analyze the alternate assessment data
 - How to summarize the alternate assessment data
 - How to create an action plan based on alternate assessment data
- The [ESSA 1% Cap on Alternate Assessment Participation: Disproportionality Calculations Webinar](#) was voluntary for special education directors from all LEAs and was publicly posted on IDOE's website. The webinar addressed the topics and issues listed below:
 - Overview of 1 Percent Cap
 - Overview of 1 Percent Criteria
 - 1 Percent Disproportionality Calculation Explanation
 - 1 Percent Disproportionality Resources

Alternate Assessment Participation Criteria: IDOE sought input from multiple LEAs on the participation criteria documents. These documents explaining participation in the alternate assessment are posted on [IDOE's website](#).

OSA TAC: In January of 2019, TAC provided input on the I AM Cognitive Lab Study. This study looked at the possibility of using different item types on the alternate assessment. TAC agreed with IDOE and AIR that three-option multiple-choice items were most appropriate for this population of students. In October of 2019, TAC provided approval on the use of Human Reader for online test administration when Text-to-Speech (TTS) is not accessible for students.

Results Driven Accountability (RDA): OSE monitors LEAs based on the federal RDA system through the OSE Programs. LEA RDA determinations include areas of compliance as well as results and data timeliness. Within the assessment calculation, IDOE looks at growth and proficiency on state assessments, proficiency on the Indiana Reading Evaluation and Determination for Grade 3 Students (IREAD-3), and participation in the alternate assessment. LEAs were informed of the points possible out of each category, how many points their district received in those categories, and an overall percentage that correlates to one of the three Technical Assistance Tiers. IDOE provided data retreats in the winter/spring of 2019 that took place in each of the ICASE roundtable regions. OSE will also provide data retreats in winter/spring of 2020 with the 1 Percent cap on the alternate assessment as a potential breakout session.

IICM: IDOE collaborates with PATINS, an assistive technology and accessibility resource center, to facilitate a communication community of practice that focuses on students with little

to no mode of communication. IICM is comprised of speech language pathologists, special education directors, teachers, resource centers, etc. and meets three times per year to provide assistance to educators in order to increase the number of students with a mode of communication so they can participate in the classroom and on the alternate assessment. Educators reviewed the 2018-2019 Learner Characteristics Inventory (LCI) and provided feedback on the eleven characteristics resulting in updates to the 2019-2020 LCI.

Accommodations-Modifications Guidance Updated: IDOE updates its [Accessibility and Accommodations Guidance](#) annually to coincide with the new accommodations offered on I AM. All test administrators were required to complete an accommodations training prior to the administration of any I AM assessment. This is an annual requirement.

IEP Data and AIR's Test Information Distribution Engine (TIDE): IEP data from Indiana's electronic IEP system (IIEP), along with AIR's TIDE) connection, reinforce which students should be assessed using I AM in lieu of the general education assessment.

LEA Visits: IDOE visited five LEAs across the state from varying geographic areas, populations, and sub groups. During these visits IDOE collaborated with team members from the LEAs to discuss alternate assessment participation guidelines and procedures to ensure that only students with the most significant disabilities are taking the alternate assessment.

Review and Analysis of 2018-19 Alternate Assessment Participation Rates: IDOE staff reviewed and analyzed alternate assessment participation data from the spring 2019 testing window. There was a reduction in the alternate assessment participation rates in all three content areas as well as in the number of LEAs that exceeded the 1 Percent Cap in ELA, Mathematics, and Science, as illustrated in [Table 1](#) and [Table 2](#). In ELA, Indiana had a reduction in the percentage of students taking the alternate assessment in the subgroups American Indian or Alaska native, Asian, Native Hawaiian or Other Pacific Islander, African American, Hispanic, White, Limited English Proficient (LEP) students, Economically Disadvantaged students, and Male and Female students. In Mathematics, Indiana had a reduction in the percentage of students taking the alternate assessment in the subgroups American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, African American, Hispanic, White, LEP students, Economically Disadvantaged students, and Male and Female students. In Science, Indiana had a reduction in the percentage of students taking the alternate assessment in the subgroups American Indian or Alaska Native, Asian, African American, White, LEP students, Economically Disadvantaged students, and Male and Female students. [Table 3](#), [Table 4](#), and [Table 5](#) illustrate these changes in the alternate assessment participation rates for all subgroups. As described above, LEAs will receive their alternate assessment data in January.

TABLE 3: COMPARISON OF ELA ALTERNATE ASSESSMENT PARTICIPATION RATES FROM 2016-2017 TO 2018-2019

Student Sub-Group	Percentage Participating in Alternate Assessment 2016-2017	Percentage Participating in Alternate Assessment 2017-2018	Percentage Participating in Alternate Assessment 2018-2019	Difference Between 2017-2018 and 2018-2019
All Students	1.25%	1.21%	1.14%	- 0.07%
American Indian or Alaska Native	1.44%	1.06%	0.93%	-0.13%
Asian	0.82%	0.87%	0.86%	-0.01%
Native Hawaiian or Other Pacific Islander	2.14%	2.46%	1.56%	-0.90%
Black or African American	1.71%	1.57%	1.48%	-0.09%
Hispanic or Latino	1.14%	1.15%	1.13%	-0.02%
White	1.20%	1.16%	1.09%	- 0.07%
Two or more races	1.26%	1.21%	1.27%	+0.06%
LEP students	2.55%	2.43%	1.54%	-0.89%
Economically Disadvantaged students	1.62%	1.54%	1.41%	-0.13%
Male	1.61%	1.55%	1.46%	- 0.09%
Female	0.88%	0.84%	0.81%	-0.03%

Table 4: Comparison of Mathematics Alternate Assessment Participation Rates from 2016-2017 to 2018-2019

Student Sub-Group	Percentage Participating in Alternate Assessment 2016-2017	Percentage Participating in Alternate Assessment 2017-2018	Percentage Participating in Alternate Assessment 2018-2019	Difference Between 2017-2018 and 2018-2019
All Students	1.25%	1.21%	1.14%	-0.07%
American Indian or Alaska Native	1.44%	1.06%	0.92%	- 0.14%
Asian	0.79%	0.86%	0.86%	0.00%
Native Hawaiian or Other Pacific Islander	2.10%	2.45%	1.77%	-0.68%
Black or African American	1.69%	1.57%	1.47%	-0.10%
Hispanic or Latino	1.13%	1.14%	1.12%	-0.02%
White	1.20%	1.16%	1.08%	- 0.08%
Two or more races	1.24%	1.20%	1.26%	+0.06%
LEP students	2.41%	2.42%	1.53%	-0.89%
Economically Disadvantaged students	1.60%	1.54%	1.40%	-0.14%
Male	1.60%	1.55%	1.46	-0.09%
Female	0.88%	0.84%	0.81%	-0.03%

Table 5: Comparison of Science Alternate Assessment Participation Rates from 2016-2017 to 2018-2019

Student Sub-Group	Percentage Participating in Alternate Assessment 2016-2017	Percentage Participating in Alternate Assessment 2017-2018	Percentage Participating in Alternate Assessment 2018-2019	Difference Between 2017-2018 and 2018-2019
All Students	1.30%	1.26%	1.14%	- 0.12%
American Indian or Alaska Native	1.35%	1.35%	0.74%	-0.61%
Asian	0.75%	1.00%	0.99%	-0.01%
Native Hawaiian or Other Pacific Islander	2.40%	1.64%	1.78%	+0.14%
Black or African American	1.74%	1.71%	1.54%	- 0.17%
Hispanic or Latino	1.12%	1.22%	1.09%	-0.13%
White	1.26%	1.20%	1.06%	- 0.14%
Two or more races	1.46%	1.09%	1.39%	+0.30%
LEP students	2.45%	2.44%	1.48%	- 0.95%
Economically Disadvantaged students	1.66%	1.64%	1.40%	- 0.24%
Male	1.67%	1.62%	1.45%	- 0.17%
Female	0.93%	0.88%	0.81%	- 0.07%

Requirement 1 (§200.6(c)(4)(i)): Submission 90-Days Prior to State Testing Window

IDOE's 2019-2020 testing window for the alternate assessment begins April 6, 2020. IDOE is submitting the 1 Percent Cap waiver extension request to the U.S. Department of Education on January 6, 2020.

Requirement 2 (§200.6(c)(4)(ii)): State-Level Data**A. State-Level Data of Alternate Assessment Participation Rate for 2018-2019 Academic Year**

IDOE reviewed and analyzed LEA level alternate assessment participation rate data for ELA, Mathematics, and Science for the 2018-19 academic year. Of the 389 LEAs statewide in 2018-2019, 166 surpassed the 1 Percent Cap in ELA, 165 in Mathematics, and 153 in Science.

Table 6, Table 7, and Table 8 illustrate IDOE’s state-level data for the number and percentage of students in each subgroup who participated in the alternate assessment in ELA, Mathematics, and Science for the 2018-2019 academic year, respectively.

Table 6: Alternate Assessment Participation Rates for ELA in 2018-2019

Student Sub-Group	# Students Participating in General Assessment	# Students Participating in Alternate Assessment	Total # Students Assessed	Percentage Participating in Alternate Assessment
All Students	541,138	6,266	547,404	1.14%
American Indian or Alaska Native	**	**	971	0.93%
Asian	13,536	118	13,654	0.86%
Native Hawaiian or Other Pacific Islander	**	**	448	1.56%
Black or African American	67,607	1,015	68,622	1.48%
Hispanic or Latino	69,208	788	69,996	1.13%
White	362,484	3,983	366,467	1.09%
Two or more races	26,900	346	27,246	1.27%
LEP students	40,639	635	41,274	1.54%
Economically Disadvantaged students	263,592	3,770	267,362	1.14%
Male	276,443	4,101	280,544	1.46%
Female	264,695	2,165	266,860	0.81%

Table 7: Alternate Assessment Participation Rates for Mathematics in 2018-2019

Student Sub-Group	# Students Participating in General Assessment	# Students Participating in Alternate Assessment	Total # Students Assessed	Percentage Participating in Alternate Assessment
All Students	541,231	6,245	547,476	1.14%
American Indian or Alaska Native	**	**	973	0.92%
Asian	13,538	117	13,655	0.86%
Native Hawaiian or Other Pacific Islander	**	**	453	1.77%
Black or African American	67,628	1,010	68,638	1.47%
Hispanic or Latino	69,216	783	69,999	1.12%
White	362,521	3,974	366,495	1.08%
Two or more races	26,919	344	27,263	1.26%
LEP students	40,653	631	41,284	1.53%
Economically Disadvantaged students	263,644	3,754	267,398	1.40%
Male	276,509	4,084	280,593	1.46%
Female	264,722	2,161	266,883	0.81%

Table 8: Alternate Assessment Participation Rates for Science in 2018-2019

Student Sub-Group	# Students Participating in General Assessment	# Students Participating in Alternate Assessment	Total # Students Assessed	Percentage Participating in Alternate Assessment
All Students	231,391	2,658	234,049	1.14%
American Indian or Alaska Native	**	**	407	0.74%
Asian	5,919	59	5,978	0.99%
Native Hawaiian or Other Pacific Islander	**	**	169	1.78%
Black or African American	28,275	442	28,717	1.54%
Hispanic or Latino	30,177	332	30,509	1.09%
White	155,213	1,661	156,874	1.06%
Two or more races	11,237	158	11,395	1.39%
LEP students	17,593	265	17,858	1.48%
Economically Disadvantaged students	111,442	1,578	113,020	1.40%
Male	118,005	1,731	119,736	1.45%
Female	113,386	927	114,313	0.81%

** Student count was redacted in compliance with the Family Educational Records and Privacy Act, 20 U.S.C. 1232g; 34 CFR Part 99.

Some cells in Tables 6, 7, and 8 contain material that has been redacted to protect student privacy. Data are redacted in any cells that represent fewer than 10 students. In addition, at least two cells must be redacted where any total is available, in order to prevent any cell required for redaction to be derived.

B. State Measured Achievement of at Least 95% of Students

Indiana met the 95% participation requirement for all students and for students with disabilities in 2018-19, as illustrated in Table 9.

Table 9: Participation Rate of All Students and Students with Disabilities Assessed 2018-2019

Content Area	Students Enrolled	Students Assessed	Percentage Assessed	Students with Disabilities Enrolled	Students with Disabilities Assessed	Percentage of Students with Disabilities Assessed
Reading	561,137	555,562	99.0%	86,810	84,513	97.4%
Mathematics	561,137	556,322	99.1%	86,810	84,886	97.8%
Science	240,558	237,677	98.8%	36,613	35,610	97.3%

Requirement 3 (§200.6(c)(4)(iii)): Assurances

A. State Assurance that LEAs Followed State Alternate Assessment Participation Guidelines

1 Percent Cap on Alternate Assessment Participation Survey

LEAs that exceeded the 1 Percent Cap on alternate assessment participation during the 2017-2018 academic year completed the 1 Percent Cap on Alternate Assessment Participation Survey in spring 2019. The 1 Percent Cap on Alternate Assessment Participation Survey required LEAs to submit justification for why they anticipated exceeding the 1 Percent Cap alternate assessment participation rates for the 2019 spring testing window. The LEAs that anticipated exceeding the 1 Percent Cap on alternate assessment participation provided assurance that appropriate LEA staff were trained on the alternate assessment participation guidelines as well as reviewed their eligibility data. This will be an annual requirement.

B. State Assurance that LEAs will Address Disproportionality of Subgroups

Indiana disaggregated the disproportionality data. IDOE utilized a relative risk ratio to analyze alternate assessment participation data for disproportionality for all subgroups of students. Below is a list of subgroups included in the analysis.

1. Racial/Ethnic Groups
 - a. American Indian or Alaska Native
 - b. Asian
 - c. Pacific Islander or Other Pacific Islander
 - d. Black or African American
 - e. Hispanic or Latino
 - f. White (not Hispanic)
 - g. Two or more races (Multiracial not Hispanic)
2. LEP
3. Socio-Economic Status (as determined by Free and Reduced Price Lunch Status)
4. Gender
 - a. Male

b. Female

The survey that will go out to LEAs that exceeded the 1 Percent Cap in 2018-2019 requires the respondent to provide assurances that the LEA will address any disproportionality in the percentage of students in any subgroup taking the alternate assessment.

Requirement 4 (§200.6(c)(4)(iv)): State Plan and Timeline

Each of the components of the State Plan are outlined below, followed by a combined timeline of all activities ([Table 10](#)).

A. Alternate Assessment Participation Criteria

After stakeholder review, the alternate assessment participation criteria did not change. This criteria is located within our electronic IEP system, IIEP. The criteria is also posted on the [alternate assessment webpage](#) and the [accountability webpage](#). The Alternate Assessment Specialist and Special Education Specialist will continue to provide support to LEAs and special education staff on the current alternate assessment participation criteria.

B. LEA Oversight and Support

IDOE is committed to ensuring that only those students with the most significant intellectual disabilities participate in the alternate assessment. Indiana's plan is designed to provide data to LEAs regarding alternate assessment participation and to ensure that LEAs provide sufficient training to support special education staff in applying alternate assessment participation guidelines so that all students are appropriately assessed. Indiana's plan is as follows:

Universal Support includes activities for all LEAs:

- In addition to reviewing participation criteria guidance annually, a recording of the [Formative Assessment Webinar for Educators of Students with Significant Cognitive Disabilities](#) is publicly available to support formative assessment strategies for educators of students with significant intellectual disabilities.
- As mentioned previously, Indiana's RDA system includes alternate assessment participation as a subcomponent within the calculation. LEAs are informed of the points possible out of each category, how many points their district received in those categories, and an overall percentage that correlates to one of the Technical Assistance Tiers in this [guidance document](#). In addition to individualized RDA tiered support, IDOE will provide universal support by offering regional data retreats which will be open to all LEAs in the spring of 2020. Alternate assessment participation data will be included in the data review.
- In addition to IDOE, IRNs will provide support to LEAs that exceed the 1 Percent Cap. Technical assistance may include on-site visits, webinars, emails and/or phone calls.
- An [optional data workbook](#) was developed and shared via webinar to help LEAs disaggregate data in multiple ways (i.e. eligibility category, school, grade level).

- Voluntary participation in live and/or recorded [1 Percent Cap webinars](#) for special education directors and educators were offered throughout the school year. Topics included reviewing disproportionality data and utilizing data workbooks. We will also answer any general questions. IDOE and IRNs were involved in the creation and facilitation of these webinars as well as available for follow up conversations or in person onsite visits afterwards.
- OSA developed a [Reporting Webinar Series](#) to help educators analyze alternate assessment data found on the I AM reports.
- OSA also developed a [Learner Characteristics Inventory Training](#) to support Case Conference Committee discussions in regard to the alternate assessment.
- OSA, in collaboration with the OSE and IICM, developed [guidance](#) regarding substitutions and adaptations for the I AM assessment.

Targeted Support activities for LEAs exceeding the 1 Percent Cap (required):

- IDOE will confirm that LEAs complete the online Alternate Assessment Assurance and Justification Survey. This survey requires LEAs to project whether they anticipate exceeding the 1 Percent Cap for the present school year. If yes, the LEA provides justification for needing to exceed the 1 Percent Cap and assurance that they will review disproportionality data of students in any subgroup taking the alternate assessment. Assurances are also made that relevant general and special education staff will participate in the Alternate Assessment Participation Webinar. If LEAs do not anticipate exceeding the 1 Percent Cap, the LEAs signify this in the comment section of the survey.
- If LEAs are out of compliance for indicators 4A/B, 9, or 10, the 1 percent disproportionality data will also be addressed when technical assistance is provided by IDOE or one of the IRNs.

Targeted Support activities for LEAs exceeding the 1 Percent Cap (optional):

- IDOE will provide support to LEAs with respect to their RDA determinations.

C. Disproportionality

IDOE utilizes a relative risk ratio to analyze alternate assessment participation data for disproportionality for all subgroups of students. The relative risk ratio compares the risk of participating in the alternate assessment for each subgroup at the LEA level to the risk for all other students at the same LEA. A ratio of 1.0 for a subgroup means that the rate of participation of the subgroup in the alternate assessment is proportionate to the rate of participation for students not in the subgroup. A ratio that exceeds 1.0 illustrates potential over-identification, while a risk ratio below 1.0 describes potential under-identification of a subgroup for participation in alternate assessment, as compared to all other students. Below is a list of subgroups included in the analysis.

1. Racial/Ethnic Groups
 - a. American Indian or Alaska Native
 - b. Asian

- c. Pacific Islander or Other Pacific Islander
- d. Black or African American
- e. Hispanic or Latino
- f. White (not Hispanic)
- g. Two or more races (Multiracial not Hispanic)
2. LEP
3. Socio-Economic Status (as determined by Free and Reduced Price Lunch Status)
4. Gender
 - a. Male
 - b. Female

The disproportionality analysis allows IDOE to determine if any subgroup is more frequently identified than other subgroups to participate in the alternate assessment. Analysis of these data will allow IDOE to focus on reducing disproportionality in the participation of students in the alternate assessment for individual subgroups. Information collected through the disproportionality analysis will provide additional information to address and reduce the overall percentage of students participating in the alternate assessment.

As accepted by the Office of Special Education Programs (OSEP), Indiana's Special Education State Performance Plan/Annual Performance Report (SPP/APR) states that disproportionality in identification rates for Indicators 9 and 10 exists if the relative risk ratio for a racial/ethnic subgroup meets or exceeds 2.0. IDOE uses the following formula to calculate the relative risk ratio for each subgroup:

- **The risk of participating in the alternate assessment by students in the subgroup:** The number of students in the subgroup who participated in the alternate assessment divided by the number of students in the subgroup who participated in either the statewide or alternate assessments in the LEA.
- **The risk of participating in the alternate assessment by all other students (comparison group):** The number of students in the comparison group who participated in the alternate assessment divided by the number of students in the comparison group who participated in either the statewide or alternate assessments in the LEA.
- **The risk ratio for the subgroup:** The risk of the subgroup (A) divided by the risk of the comparison group (B) multiplied by 100.

Addressing any disproportionality in the percentage of students in any subgroup taking the alternate assessment was discussed in one of IDOE/IRN webinars that is publicly posted.

LEAs provided assurance that they are addressing any disproportionality in the percentage of students in any subgroup taking the alternate assessment through the submission of IDOE's survey.

Table 10: Timeline for all Requirement 4 Components

Date	Activity
October 16, 2017	1 Percent Waiver submitted
January 5, 2018	Memo of notification and actions required sent to LEAs who exceeded the 1 Percent Cap
January 15, 2018	ISTAR testing window for SY 2017-2018 opens
January 2018	New IDOE Assessment Accessibility Specialist position created
February 5, 2018	Communication Community of Practice meeting
February 16, 2018	IDOE presentation to ICASE
February 21-22, 2018	Attend CCSSO ASES meetings in Miami
February-July 2018	IDOE and IRN provide technical assistance to corporations by request
February 2018	IDOE and IRN review corporation surveys and develop technical assistance options
April 13, 2018	Stakeholder input on justifications from survey (program, small LEA, other)
April-May 2018	Content Connectors revised
May 14, 2018	Communication Community of Practice meeting
June 2018	Disproportionality data disaggregated and submitted to IDOE by Center on Education and Lifelong Learning (CELL)
June 8, 2018	IDOE and IRN meeting to discuss Technical Assistance Plan
June 14, 2018	I AM Blueprint Meeting
June 26-27, 2018	Attend CCSSO ASES meetings in San Diego
July 1, 2018	Transition to new alternate assessment, I AM (and ILEARN)
July 12-13, 2018	I AM Item Specifications Meeting
July 17, 2018	IDOE and IRN Accommodation vs Modification meeting
July 19, 2018	IDOE and IRN meeting to discuss Technical Assistance Plan
August 2018	I AM Webinars and Blueprints developed
August 6, 2018	I AM Passage Review Meeting

August 13, 2018	IDOE Assessment and Graduation Pathways webinar for INSOURCE
August 14, 2018	IDOE and IRN Accommodation vs Modification meeting
August 16, 2018	IDOE and IRN RDA & technical assistance tracking meeting
August 16-17, 2018	Webinar: Understanding Indiana's Alternate Measure (I AM)
August 23, 2018	IDOE ARC of Indiana (parent stakeholder group) assessment presentation
September 1, 2018	I AM Educator and Family Brochures posted to I AM Portal
September 5, 2018	IDOE and IRN meeting to discuss Technical Assistance Plan
September 10, 2018	Communication Community of Practice meeting
September 11-13, 2018	I AM Performance Level Descriptor Meeting
September 21, 2018	RDA stakeholder meeting
October 1, 2018	I AM Item Specification added to I AM website
October 1, 2018	I AM Released Items Repository available on the I AM Portal
October 5, 2018	IDOE and IRN meeting to discuss Technical Assistance Plan
October 5, 2018	IDOE presentation to ICASE
October 10, 2018	I AM Practice Test available
October 12, 2018	IDOE & INSOURCE 1 Percent waiver meeting
October 17-18, 2018	1 Percent NCEO Convening in Boston (presentation on 1 Percent and RDA)
October 18, 2018	Certificate of Completion presentation to math specialists in IDOE School Improvement, 1 Percent slide in presentation
October 29-November 15, 2018	I AM Cognitive Labs
November 2018	Targeted School Intervention status released to schools; IDOE will provide technical assistance
November 7-8, 2018	IDOE INSOURCE In-Service presentation
November 8, 2018	IDOE 1 Percent presentation to INSOURCE staff
November 9, 2018	IDOE State Advisory Council 1 Percent presentation

November 20, 2018	Project SUCCESS (IRN) Certificate of Competition training (1% discussion included)
November 27, 2018	LEA RDA determinations delivered; RDA technical assistance provided by IDOE and IRNs; specific compliance technical assistance provided for overlapping disproportionality (Indicators 4, 9, and/or 10 and 1 Percent)
November 27-29, 2018	I AM Content and Fairness Meeting
December 2018	IDOE Formative Assessment Webinar for Educators of Students with Significant Cognitive Disabilities released
December 3-14, 2018	Waiver extension posted for public comment
December 3-14, 2018	IDOE recorded updated 1 Percent webinar
December 4-7, 2018	IDOE videotaping of I AM teachers and students for use in test administration examples
December 17, 2018	I AM Policy and Performance Level Descriptors posted to IDOE website
December 17-21, 2018	Review public comment and update waiver if necessary
December 21, 2018	Submit 1 Percent Waiver Extension
December 2018-January 2019	Spring Pretest Workshops for CTCs
January 14, 2019	Indiana Inclusive Communication Matters meeting
February 4, 2019	RDA Data Retreat-North Central Roundtable
February 15, 2019	RDA Data Retreat-Central Roundtable
February 19, 2019	RDA Data Retreat-Northwest Roundtable
February 22, 2019	RDA Data Retreat-Southeast Roundtable
February 25, 2019	RDA Data Retreat-Southwest Roundtable
February 25-March 1, 2019	I AM Test Administration Trainings
March 1, 2019	RDA Data Retreat-Northeast Roundtable
March 4-8, 2019	I AM Test Administration Trainings
March 7, 2019	Presented 1 Percent disproportionality information at NCEO 1 Percent CoP virtual meeting

March 15, 2019	RDA Data Retreat-East Roundtable
March 18-22, 2019	I AM Test Administration Trainings
March 18, 2019	LCI Opens for Test Administrator completion
March 29, 2019	I AM TA User Guides and FAQ posted to I AM Portal
April 8-May 17, 2019	I AM Operational Window
April 22, 2019	Indiana Inclusive Communication Matters meeting
May 22, 2019	IDOE and IRN data live and recorded webinar for LEAs
May-August 2019	I AM Reporting Webinar Series
August 15, 2019	Online Reporting System (ORS) deploys
August 28, 2019	IDOE and IRN disproportionality live and recorded webinar for LEAs
September 9, 2019	Indiana Inclusive Communication Matters meeting
October 1, 2019	2019-2020 I AM Brochures for Families and Educators posted to IDOE Website
October 1, 2019	Updated 2019-2020 Released Items Repository and Understanding I AM Webinar posted to I AM Portal
October 2019	Learner Characteristics Training and guidance regarding substitutions and adaptations for the I AM assessment available publically
October-November 2019	IDOE conducted five LEA 1 Percent visits
December 2019-January 2020	Spring Pretest Workshops for CTCs
December 5, 2019	Present to NCEO 1 Percent CoP on potential 1 Percent research study
December 19, 2020	IDOE record updated 1 Percent webinar
December 23, 2019-January 6, 2020	Post and review public comment and update waiver extension if necessary
January 6, 2020	Submit 1 Percent Waiver Extension
February 2020	RDA Roadshows
February 18-19, 2020	Participation in CCSSO ASES meeting
February - March 2020	New I AM TA Training Webinars

March 9, 2020	I AM TA Certification Course Deploys
March 26-30, 2020	I AM Q and A Sessions
April 6-May 15, 2020	I AM Operational Window
June 18-19, 2020	Participation in CCSO ASES meeting

Public Comment

IDOE provided direct information to stakeholders via email notification including notification regarding the changes pursuant of ESEA §111(b)(2)(D) and 34 CFR 200.6(c) and (d) to the 1.0% cap on alternate assessment participation, a copy of the Indiana 1% Percent Cap Waiver Extension Request, and guidelines for submitting comments to IDOE using the online Public Comment Form Regarding the Indiana 1.0% Cap Waiver Extension Request. Stakeholders included but were not limited to INSOURCE, State Advisory Council, LEA Assessment Coordinators, and Special Education Directors. To ensure public access, a copy of the Indiana 1% Percent Cap Waiver Extension Request and guidelines for providing comments were posted on IDOE website on both the Accountability and Special Education home pages. An invitation to comment on the Indiana 1% Percent Cap Waiver Extension Request was included as part of the Weekly Update sent out to all public LEA superintendents as well. IDOE allowed 2 weeks for public comment, closing on January 3, 2020. IDOE received 18 comments which have been grouped by similar content. IDOE response to each group of similar comments/questions follows at the end of each topical section.

Submissions Commenting on the 1 Percent Threshold

District-level Administrator: Each year my local school corporation has approximately 1.12-1.15% of students participating in IN alternative measure assessment (I AM). My district uses DOE guidance to determine the eligibility of this assessment. Students with significant disabilities benefit from taking this assessment. We do not overuse this tool, but feel as though we are penalized for having too many students participate, even when it is appropriate. A percentage greater than 1% needs to be examined.

District-level Administrator: The waiver is definitely needed for multiple reasons. My district is small which makes my percentage higher than 1% due to the small numbers of students taking assessments overall. I also have a lot of move-in students who were already on the alternate assessment prior to coming to our district.

District-level Administrator: School districts do not have a capacity to cap their student populations at 1%; therefore, the testing of these students should also not be capped at 1%. Our district population of students with severe and profound disabilities far exceeds the state average. This is not due to over identification but rather is the result of the quality services that we provide. Our surrounding districts are members of a co-op which would require students to travel for services. We, however, provide all services within the district for all disabilities. This situation continues to draw more students to our district. With a population that already exceeds the cap, it is inappropriate to not provide the best assessment to students simply because of a federal cap. I am in full support of raising the cap to do what is right and best for our students.

Teacher/Educator: There should not be a 1% cap on kids taking alternative assessment. If there are kids in the building who meet the requirements for alternative assessment, the school should not be penalized if there are more than 1% of the population. That cannot be helped. The kids met the requirements.

District-level Administrator: Our school corporation has over 3,700 Special Education students. This is more than 1% of our overall student population. We are the only institution within our tristate area that provides these types of services for students, so we get an influx from outside of our designated county.

We should not be limited to 1%, we should go back to 3%.

District-level Administrator: The current 1% cap basically penalizes School Corporations for exceeding the 1% mandated cap of students participating in alternative assessments. The mandate should allow educators to make assessment determinations based on what is best for students participating in modified curriculum.

School Administrator: Allowing only 1% of our student population to take an alternative assessment is a policy that is not only setting our school up for failure but also our students. Our student population consists of students who are blind, suffer traumatic brain injuries, are Quadriplegic, and cannot even feed themselves let alone take a standardized test!

District-level Administrator: To put it bluntly and simply, this 1% cap is ludicrous! Schools should not be worried about a cap on how many students take certain assessments when they are doing what is best for the children. In a school of nearly 1,100 students, we would likely be very near the 1% and these students are in modified classrooms which has been decided by a case conference committee to be in the best interest of the child. Why then, would we turn around say, but we need you to take this assessment so we aren't penalized as a school.

These people making and suggesting these absurd rules have no clue what the real world of education is like and sadly, most don't even seem to care. And, as a real public school, we take ALL students!

District-level Administrator: While it is time we have high expectations for all students, including those with intellectual disabilities, I am dismayed that the 1% cap may be forcing schools to make decisions that are not in the best interest of individual students. I do not see how we can ethically meet the 1% cap while at the same time creating courses of study that are aligned to the real world for some of our students. Human beings cannot be so neatly sectioned off. Disabilities compound and manifest in ways that cannot be quantified. 1% is ridiculous. 2% we can do.

Teacher/Educator: The very first paragraph written in ESSA Assessment NFR Summary Fact Sheet for Final Reg. title i part a and b December 7, 2017

"High-quality assessments are essential to effectively educating students, measuring progress, and promoting equity. Done well and thoughtfully, they provide critical information for educators, families, the public, and students themselves and create the basis for improving outcomes for all learners. Done poorly, in excess, or without clear purpose, however, they take valuable time away from teaching and learning, and may drain creative approaches from our classrooms. In October 2015, President Obama announced a Testing Action Plan to restore balance to America's classrooms by ensuring fewer, better, and fairer tests."

1% no matter the size or need of a district we are tied to 1%. How are we providing equity when we are allowed only 1% of the population to have an alternative assessment? Consider the idea of rubric or guidelines, meeting the criteria set forth to test with an alternate assessment. Meet the needs of the students. Only allowing 1% of our students to take an Alternate assessment is not meeting the Testing Action Plan.

District-level Administrator: There should not be a cap on an item that is a Case Conference Committee decision. If, in the natural peaks and valleys of your special education population, you experience an influx of students who should take the alternate assessment, neither the school nor state should be punished or subject to corrective action. The waiver should most certainly be granted.

District-level Administrator: We exceed our 1% every year. We write an action plan, we remind our teachers of the criteria of who should and should not take an alternate assessment, teachers must notify me first prior to moving a student to an alternate assessment, but we still exceed the 1% threshold. We don't do this intentionally, we plan for each child based on their individual strengths and weaknesses and need, just as we should. Our teachers work with Project Success, we plan strategically and set high expectations for ALL students. Some of our students benefit from taking the I Am, and to be honest, we have some who should not be expected to take a standard based test such as this at all.

Our teachers have very high expectations with a rigorous curriculum.

Because of the positive reputation of our programs and the fact that we have 3 ABA centers in our district boundaries (parents move to this area for the support), we have students chose to come to our district for special education services, some of these students will earn a certificate and take I AM), because of this we often exceed the 1%.

The 1% threshold is not realistic for many districts. It should be increased.

District-level Administrator: I don't want to toot my own horn, but TOOT! TOOT! We have families of students with significant needs transferring to our district for quality instruction. Unfortunately, this has put us over 1% cap on alternate assessments. There has got to be a better way to fix this one percent than what we are doing now. We also had a family in our district who adopted four children with Down syndrome which causes us to go over too.

IDOE Response: On a multistate and USED call on August 9, 2018, it was confirmed that the 1 percent threshold is not currently being reevaluated by USED. As described in 34 CFR 200.6(c)(3), a State may not prohibit an LEA from assessing more than 1.0 percent of its assessed students with an AA-AAAS. However, a State must require an LEA that assesses more than 1.0 percent of its assessed students in any subject with an AA-AAAS to submit information to the State justifying the need to exceed the 1.0 percent threshold.

Submissions Commenting on Case Conference Committee Decisions

District-level Administrator: As a special education director for a large cooperative in Northwest Indiana, covering eight school corporations, I offer those considering the waiver, special education statistics that verify our need for a higher waiver than 1% for an alternative assessment. Our December 1st count of student population demonstrates that we have more than 1% of our population with a basic intelligence and adaptive skills in either the severe or moderately cognitively impaired range. We take tremendous care in correctly identifying

students for eligibility for special education, and have documentation for each of our 4,000 students depicting ability. Our community is in a highly industrial location undergoing a steady financial decline. While we can move a percentage of these students to an assessment that they can't even begin to comprehend, but this truly flies in the face of any logic and I vehemently ask for consideration of this waiver. We need to assess these children, and be accountable for their progress, but with something meaningful to their skill set and ability.

District-level Administrator: 1% of our population in Jay County who take an alternate assessment are appropriate for this option. We also have a significant number of students who are required to participate in the state assessment where it shows to not be as appropriate. Why? Because their skills are significantly comparable to the students who are taking the alternate assessment. But because schools are only allowed the 1%, we have to have them take the typical state assessment. This impacts families, because we have already worked closely with them explaining their child may not receive a diploma and are in classes supporting that alternate direction but we will still assess them at grade level. Students become quite frustrated when assessed on curriculum that does not align to their functioning level, increasing inappropriate behaviors and reducing instructional minutes.

Teacher/Educator: We do not have a single student in our building eligible to take the alternate assessment due to the % caps. We have student populations that are labeled MI or MO and having to take the state ILEARN assessment with us knowing very well that it is beyond what a medical professional has determined as their level of ability.

IDOE Response: IDOE agrees the Case Conference Committee (CCC) makes the determination of how a student will participate in statewide assessments. The CCC must follow the [Indiana Participation Guidelines](#) if it is to assign a student to participate in the Indiana Alternate Assessment. No one member of the CCC makes this decision. Parents, teachers, and administrators make the decision based on evidence and information to the Indiana Criteria for Determining Participation in the Alternate Assessment in Lieu of the General Education Assessment.

IDOE wants to remind the public of the federal regulations:

ESEA section 1111(b)(2)(D) and 34 CFR 200.6(c) and (d) contain requirements for the participation of students with the most significant cognitive disabilities in the AA-AAAS. ESEA section 1111(b)(2)(D)(i)(I) limits the total number of students with the most significant cognitive disabilities who are assessed Statewide with an AA-AAAS to 1.0 percent of the total number of students in the State who are assessed in that subject. As described in 34 CFR 200.6(c)(3), a State may not prohibit an LEA from assessing more than 1.0 percent of its assessed students with an AA-AAAS. However, a State must require an LEA that assesses more than 1.0 percent of its assessed students in any subject with an AA-AAAS to submit information to the State justifying the need to exceed the 1.0 percent threshold. States must provide appropriate oversight of each LEA that is required to submit such a justification and must make the justification publicly available, provided that it does not reveal personally identifiable information about an individual student.

Other Submissions

Parent/Guardian of a Current Student: Down Syndrome Indiana would like to thank you for the opportunity to comment on the Indiana 1 Percent Cap Waiver Extension Request.

With the Indiana Department of Education's dedication to all students, including those with disabilities, being held to high expectations and having equitable access to educational opportunities that enrich their lives and prepare them for future success, I am sure it is frustrating for you to have to apply for an extension for the Indiana 1 Percent Cap Waiver year after year. When reading the below comments, please do keep in mind that Down Syndrome Indiana does not question your dedication to all of the students in our state but would like to voice its opinion specifically on the Indiana 1 Percent Cap Waiver Extension Request.

Having said that, Down Syndrome Indiana is concerned that the state will continue to request waivers year after year indefinitely. While it is agreed that there has been progress toward meeting the 1 percent cap on alternate assessment participation since its original waiver was submitted and approved and that IDOE is moving in the right direction, Down Syndrome Indiana would like to see a timeline that would describe when/if the state actually anticipates meeting the 1 percent cap. Also, Down Syndrome Indiana is curious how substantial progress is defined? If the state anticipates that there will always be those schools who do not comply, what will be done to address that unfortunate event?

In addition, Down Syndrome Indiana does not see a description of how the waiving of the 1% cap will actually advance student academic achievement. This is an important point that should be included.

With public comments due January 3rd and a submission date of January 7th, Down Syndrome Indiana is concerned that not enough time is given to actually incorporate comments in the waiver extension request. The comments and input provided by the public on the waiver request along with a description of how the state addressed the comments and input should be included.

Down Syndrome Indiana appreciates the many resources and links included in the waiver request. When will the 2018-2019 Public posting of 1% Justifications be posted?

Thank you again for this opportunity to comment.

IDOE Response: On a multistate and USED call on August 9, 2018, it was stated that the statute does not limit the ability of a state to apply for multiple waiver extensions, but notes the idea of states making substantial progress towards the 1 percent threshold. IDOE will continue to request a waiver extension each year until Indiana meets the 1 percent threshold, but does not plan to set benchmarks each year.

Per the [May 16, 2017 USED memo](#): If a State requests to extend a waiver for an additional year, it must demonstrate substantial progress towards achieving each component of the plan and timeline. Indiana does not have a definition of substantial progress.

The 1 percent cap is a state-wide cap on participation, not a school or corporation participation cap. It is not a compliance-based indicator, therefore if the state as a whole is below the 1 percent threshold, neither schools nor corporations will be asked to take further action.

IDOE maintains that students with significant intellectual disabilities should be held to high expectations and have equitable access to educational opportunities. The federally imposed 1 percent cap is an aspirational goal rooted in the policy of maximizing inclusion. For those students receiving instruction using content connectors (alternate standards) and participating in the alternative assessment rather than receiving

instruction using Indiana academic standards and participating in the general assessment, there are fewer graduation/diploma options available.

After the public review period ended, comments were reviewed and addressed in the final waiver extension and publicly posted on our website. The 1 percent justifications are typically posted in March of each year.

District-Level Administrator: As a small urban school district, we have a handful of students who will need the alternate assessment but because we only have 1200 students overall, we know we will exceed the cap by tenths of a percentage point. If Indiana can anticipate how many students will be assessed and know they will exceed the cap, Indiana should be proactive and request a waiver extension.

Thank you.

IDOE Response: As stated on page 3: Alternate assessment participation rates for 2018-2019 were 1.14% for ELA, Mathematics, and Science. Based on this data, IDOE anticipates exceeding the 1 Percent Cap for the 2019-2020 alternate assessment administration in ELA, Mathematics, and Science. Therefore, IDOE is submitting the required waiver extension request. This Indiana 1 Percent Cap Waiver Extension Request documents that IDOE complied with all assurances outlined in IDOE's original waiver.