



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

June 24, 2025

The Honorable Katie Jenner  
Secretary of Education  
Indiana Department of Education  
100 N. Senate Ave., 9<sup>th</sup> Floor  
Indianapolis, IN 46204

Dear Secretary Jenner:

I am writing in response to the Indiana Department of Education's (IDOE's) revised request on June 12, 2025, for a one-year waiver extension for school year (SY) 2024-2025 of section 1111(b)(2)(D)(i)(I) of the Elementary and Secondary Education Act of 1965 (ESEA) so that the State may assess with an alternate assessment based on alternate academic achievement standards (AA-AAAS) more than 1.0 percent of all students assessed in reading/language arts (R/LA), mathematics, and science. IDOE had initially made this request on December 26, 2024, because based on its data for SY 2023-2024, the State concluded that it may exceed the 1.0 percent cap on AA-AAAS participation in R/LA, mathematics, and science for SY 2024-2025.

On April 15, 2025, the Department declined to approve IDOE's initial request because it did not find that approving the waiver extension request would advance student academic achievement as required in ESEA section 8401(b)(1)(C).

While I appreciate the additional information that IDOE provided, the revised request does not meet the statutory and regulatory requirements for a waiver extension. That is, none of the new information provided in the revised waiver extension request has resolved the issue that led to the denial of the original request. The updated AA-AAAS participation rates in the revised waiver extension request still do not demonstrate that the State has made substantial progress in reducing its AA-AAAS participation rates in SY 2023-2024 when compared to SY 2022-2023. In fact, the rates slightly increased for each subject.

As a result, I am declining to exercise my authority under section 8401(b) of the ESEA to approve IDOE's revised request for a one-year waiver extension for SY 2024-2025 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 all students assessed in R/LA, mathematics, and science.

Pursuant to section 8401(b)(4)(B)(iii) of the ESEA, the State may request a hearing to present argument and any testimony in support of its waiver extension request. If IDOE requests a hearing, it may submit written argument; present oral testimony from one or more witnesses in Washington, DC or via teleconference; or both. By statute, we must conduct this hearing within 30 days after the date of IDOE's revised waiver extension request—*i.e.*, by July 11, 2025.

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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.*

Therefore, please let me know by **July 8, 2025**, whether you intend to present oral testimony. IDOE may also submit a written argument to me by **July 11, 2025**.

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 my staff at [ESEA.Assessment@ed.gov](mailto:ESEA.Assessment@ed.gov).

Sincerely



Hayley B. Sanon  
Principal Deputy Assistant Secretary  
and Acting Assistant Secretary  
Office of Elementary and Secondary Education

cc: Jennifer Spencer, Special Education Specialist  
Nancy Holsapple, Director of Special Education



INDIANA  
DEPARTMENT *of*  
EDUCATION

# Indiana's 1% Waiver Extension Request

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

**Indiana Department of Education**

100 N. Senate Ave.  
Indianapolis, IN 46204



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Introduction & Federal Requirements

Under the leadership of the Governor and Secretary of Education, Indiana has established strategic priorities to support the education of Hoosier students. The Indiana Department of Education (IDOE) is embedded in the decision-making process of case conference committees, particularly when reviewing a student’s eligibility for Indiana’s Alternate Measure (I AM), Indiana’s alternate assessment aligned with alternate academic achievement standards (AA-AAAS). The strategic priorities also play a critical role in instructional planning to enhance student outcomes, strengthen academic achievement, increase parental involvement, empower school leaders, and leverage student data to support students with significant cognitive disabilities.

The guiding principles of IDOE emphasize student-centered decision-making, open communication across departments, shared ownership of responsibilities, receptiveness to feedback, and the welcoming of innovative ideas. Under the direction of the Governor Braun and Secretary of Education each local education agency is encouraged to establish clear performance metrics, collaborate with key stakeholders, and maintain fiscal responsibility to ensure every Indiana student has the opportunity to succeed.

Indiana has prioritized providing students with an education that is personalized for all students’ needs and relevant in today’s world. The Governor and Secretary of Education have [collaborated with industry leaders](#) to ensure coursework aligns with employment, enlistment, or enlistment & service by establishing key partnerships and tangible credentials of value for Indiana students.

This waiver extension request outlines the work that was done during the 2023-2024 school year to address the needs of students who would be participating in the assessment during the 2024-2025 school year. The waiver extension request, if granted, would apply to the current assessment administration that took place during April and May 2025.



## Requirement One: Waiver Submission

*34 Code of Federal Regulations (CFR) §200.6(c)(4)(i): "...submit an alternate assessment waiver request (or extension request) at least 90 days prior to the start of the relevant subject testing windows."*

Title 1 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESEA), requires states to submit a waiver request for exceeding the one percent (1.0%) cap for the number of students who participate in the state's alternate assessment aligned with alternate academic achievement standards (AA-AAAS).

As described in 34 CFR 200.6(c)(3), states may not prohibit a local educational agency (LEA) from assessing more than one percent of its assessed students with an AA-AAAS; however, the LEA must submit information justifying the need to exceed this threshold. Section 34 of CFR 200.6(c)(4) requires states to submit a waiver to the U.S. Department of Education if it is anticipated that the state will exceed the one percent cap for any subject using the AA-AAAS.

Indiana's Alternate Measure (I AM) is the selected alternate statewide assessment for Indiana students with the most significant cognitive disabilities and assesses students using the alternate achievement standards (i.e., Content Connectors). The Indiana Department of Education (IDOE) submits this waiver extension request to the U.S. Department of Education 90 days before the alternate assessment window in fulfillment of requirement one.

*The I AM assessment window was open from Monday, March 31, through Friday, May 9, 2025. This waiver was originally submitted on December 15, 2024. This content is an updated version of the previously submitted waiver.*

## Requirement Two: Alternate Assessment Participation Data

Pursuant to 34 CFR § 200.6(c)(4)(ii), IDOE must 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 law who took the alternate assessment aligned with alternate academic achievement standards; and
- (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 law who are enrolled in grades for which the assessment is required under [§ 200.5\(a\)](#);

The following information provides historical data trends for students in Indiana who participated in I AM for English/Language Arts (ELA), Mathematics, and Science.

## 2023-2024 Overall Statewide Participation Data

**Table 1. Current and Historic Statewide Participation Rate by Content Area**

Content Area	2016-2017	2017-2018	2018-2019	2020-2021	2021-2022	2022-2023	2023-2024
ELA	1.25%	1.21%	1.14%	1.00%	1.01%	1.08%	1.09%
Mathematics	1.25%	1.21%	1.14%	1.01%	1.01%	1.08%	1.09%
Science	1.30%	1.26%	1.14%	1.00%	0.97%	1.13%	1.15%

**Table 1a. Participation Data by Content Area, School Year 2023-2024**

Subject	Number of Participating: I AM	Number of Participating: ILEARN	Total	% Participating I AM
ELA	6,400	585,590	591,990	1.09%
Mathematics	6,379	585,219	591,598	1.09%
Science	2,870	249,473	252,343	1.15%

## 2023-2024 Statewide Participation Data by Content Area

**Table 2. I AM ELA Participation: 2023-2024 School Year**

I AM ELA Participation: 2023-2024			
Group	Total Number in Grades 3-8 and High School (HS)	Number Taking I AM in Grades 3-8 & HS	Percent Taking I AM in Grades 3-8 & HS
All Students	585,590	6,400	1.09%
Hispanic or Latino	87,702	920	1.05%
American Indian/Alaskan Native	912	10	1.10%
Asian	18,700	222	1.19%
Black or African American	74,352	1,047	1.41%
Hawaiian/Pacific Islander	608	*	1.48%
White	371,703	3,814	1.03%
Two or More Races	31,612	378	1.20%
Male	299,644	4,246	1.42%
Female	285,946	2,154	0.75%

English Learner	49,320	813	1.65%
Students Receiving Free/Reduced Price Meals	269,997	3,539	1.31%

\*\*Student count was redacted in compliance with the Family Educational Records and Privacy Act (FERPA), 20 U.S.C. 1232g; 34 CFR Part 99. Data is redacted in any cells that represent fewer than 10 students. In addition, at least two cells must be redacted where any total is available to prevent any cell required for redaction from being derived.

**Table 3. I AM Mathematics Participation: 2023-2024 School Year**

I AM Mathematics Participation: 2023-2024			
Group	Total Number in Grades 3-8 and HS	Number Taking I AM in Grades 3-8 & HS	Percent Taking I AM in Grades 3-8 & HS
All Students	585,219	6,379	1.09%
Hispanic or Latino	87,601	917	1.05%
American Indian/Alaskan Native	910	10	1.10%
Asian	18,699	222	1.19%
Black or African American	74,276	1,038	1.40%
Hawaiian/Pacific Islander	607	*	1.48%
White	371,559	3,809	1.03%
Two or More Races	31,566	374	1.18%
Male	299,432	4,235	1.41%
Female	285,787	2,44	0.75%
English Learner	49,264	808	1.64%
Students Receiving Free/Reduced Price Meals	269,763	3,523	1.31%

\*\*Student count was redacted in compliance with FERPA, 20 U.S.C. 1232g; 34 CFR Part 99. Data is redacted in any cells that represent fewer than 10 students. In addition, at least two cells must be redacted where any total is available to prevent any cell required for redaction from being derived.

**Table 4. I AM Science Participation: 2023-2024 School Year**

I AM Science Participation: 2023-2024			
Group	Total Number in Grades 3-8 and HS	Number Taking I AM in Grades 3-8 & HS	Percent Taking I AM in Grades 3-8 & HS















All Students	249,473	2,870	1.15%
Hispanic or Latino	37,380	412	1.10%
American Indian/Alaskan Native	373	*	2.14%
Asian	8,196	84	1.02%
Black or African American	31,404	502	1.60%
Hawaiian/Pacific Islander	266	*	0.75%
White	158,580	1,695	1.07%
Two or More Races	13,273	167	1.26%
Male	127,787	1,913	1.50%
Female	121,686	957	0.79%
English Learner	21,469	342	1.59%
Students Receiving Free/Reduced Price Meals	114,444	1,617	1.41%

\*\*Student count was redacted in compliance with FERPA, 20 U.S.C. 1232g; 34 CFR Part 99. Data is redacted in any cells that represent fewer than 10 students. In addition, at least two cells must be redacted where any total is available to prevent any cell required for redaction from being derived.












## Data Comparison: Historic Alternate Assessment Subgroup Participation by Content Area


**Table 5. I AM ELA Participation: 2016-2017 to 2023-2024 School Year**

Student Populations	2016-2017	2017-2018	2018-2019	2020-2021	2021-2022	2022-2023	2023-2024	Difference from 2016-2017 and 2023-2024	Outcome
All Students	1.25%	1.21%	1.14%	1.00%	1.01%	1.01%	1.09%	-.16	
American Indian or Alaska Native	1.44%	1.06%	0.93%	0.95%	1.25%	1.27%	1.05%	-.39	










Asian	0.82%	0.87%	0.86%	0.71%	0.94%	0.93%	1.10%	.28	
Hawaiian or Other Pacific Islander	2.14%	2.46%	1.56%	1.28%	0.92%	0.85%	1.19%	-.95	
Black or African American	1.71%	1.57%	1.48%	1.25%	1.29%	1.32%	1.41%	-.30	
Hispanic or Latino	1.14%	1.15%	1.13%	0.95%	1.00%	1.02%	1.48%	.34	
White	1.20%	1.16%	1.09%	0.97%	0.97%	0.94%	1.03%	-.17	
Two or more Races	1.26%	1.21%	1.27%	1.17%	1.04%	0.14%	1.20%	-.06	
Male	1.61%	1.55%	1.46%	1.30%	1.34%	1.33%	1.42%	-.19	
Female	0.88%	0.84%	0.81%	0.70%	0.68%	0.68%	0.75%	-.13	
English Learner	2.55%	2.43%	1.54%	1.43%	1.56%	1.50%	1.65%	-1.13	
Students Receiving Free/Reduced Price Meals	1.62%	1.54%	1.41%	1.13%	1.18%	1.22%	1.31%	-.87	




**Table 6. I AM Mathematics Participation: 2016-2017 to 2023-2024 School Year**

Student Populations	2016-2017	2017-2018	2018-2019	2020-2021	2021-2022	2022-2023	2023-2024	Difference from 2016-2017 to 2023-2024	Outcome
All Students	1.25%	1.21%	1.14%	1.01%	1.01%	1.00%	1.09%	-.16	
American Indian or Alaska Native	1.44%	1.06%	0.92%	0.95%	1.36%	1.26%	1.05%	-.39	
Asian	0.79%	0.86%	0.86%	0.71%	0.94%	0.92%	1.10%	.31	
Hawaiian or Other Pacific Islander	2.10%	2.45%	1.77%	1.28%	0.93%	0.85%	1.19%	-.91	
Black or African American	1.69%	1.57%	1.47%	1.25%	1.28%	1.31%	1.40%	-.29	
Hispanic or Latino	1.13%	1.14%	1.12%	0.96%	0.99%	1.01%	1.48%	.35	
White	1.20%	1.16%	1.08%	0.96%	0.97%	0.94%	1.03%	-.17	
Two or more Races	1.24%	1.20%	1.26%	1.17%	1.05%	1.32%	1.18%	-.06	
Male	1.60%	1.55%	1.46%	1.29%	1.34%	1.32%	1.41%	-.19	
Female	0.88%	0.84%	0.81%	0.70%	0.68%	0.67%	0.75%	-.13	
English Learner	2.41%	2.42%	1.53%	1.43%	1.57%	1.48%	1.64%	-.77	

Students Receiving Free/Reduced Price Meals	1.60%	1.54%	1.40%	1.13%	1.17%	1.21%	1.31%	-.29	
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**Table 7. I AM Science Participation: 2016-2017 to 2023-2024 School Year**

Student Populations	2016-2017	2017-2018	2018-2019	2020-2021	2021-2022	2022-2023	2023-2024	Difference from 2016-2017 to 2023-2024	Outcome
All Students	1.30%	1.26%	1.14%	1.04%	0.97%	1.06%	1.15%	-.15	
American Indian or Alaska Native	1.35%	1.35%	0.74%	0.78%	1.36%	1.27%	1.10%	-.25	
Asian	0.75%	1.00%	0.99%	0.92%	0.71%	0.99%	2.14%	1.39	
Hawaiian or Other Pacific Islander	2.40%	1.64%	1.78%	0.50%	0.42%	1.98%	1.02%	-1.38	
Black or African American	1.74%	1.71%	1.54%	1.23%	1.33%	1.44%	1.60%	-.14	
Hispanic or Latino	1.12%	1.22%	1.09%	1.04%	0.91%	1.06%	0.75%	-.37	
White	1.26%	1.20%	1.06%	1.01%	0.93%	0.97%	1.07%	-.19	
Two or more Races	1.46%	1.09%	1.39%	1.21%	1.04%	1.25%	1.26%	-.20	
Male	1.67%	1.62%	1.45%	1.35%	1.27%	1.40%	1.50%	-.17	

Female	0.93%	0.88%	0.81%	0.74%	0.68%	0.70%	0.79%	-.14	
English Learner	2.45%	2.44%	1.48%	1.68%	1.32%	1.64%	1.59%	-.86	
Students Receiving Free/Reduced Price Meals	1.66%	1.64%	1.40%	1.17%	1.15%	1.27%	1.41%	-.25	

## Analysis of Participation Rates 2016-2017 through 2023-2024

A review of the latest cohort of students participating in I AM included a longitudinal analysis of students spanning five years. The monitoring team evaluated targeted LEAs with the largest cohort of students and the highest participation rates, as well as data from students who participated in I AM after their sophomore year due to special circumstances. It was found that many students were participating in I AM due to a recent change in the graduation pathway. Alternate diploma, LEA enrollment data, and EL status were three factors that contributed significantly to the participation rate of I AM for the 2023-2024 school year.

### Alternate Diploma

Beginning with the 2022-2023 school year, students were eligible to receive the alternate diploma.

The alternate diploma is a standards-based diploma available to students with the most significant cognitive disabilities, pursuant to Indiana Administrative Code (IAC) 7-32-93.5, who participate in the state's alternate assessment (I AM) and meet the criteria set forth in 511 IAC 6-7.1-10. The alternate diploma may not be awarded to any students aside from those identified as meeting the criteria outlined in 511 IAC 7-32-93.5 and for whom a case conference committee has determined the alternate diploma is appropriate. The criteria for Indiana's Alternate Measure (I AM) are used to determine eligibility for the alternate diploma.

The Office of Student Assessments reported that for the 2023-2024 school year, there were 166 requests by LEAs to allow select students to participate in I AM after sophomore year as a method to demonstrate eligibility for the alternate assessment.

Research into 258 individualized education programs (IEPs) of students who participated in I AM during the 2023-2024 school year revealed a trend. 26 IEPs were reviewed from the 166 requests received by the Office of Student Assessment. Data indicated that those students previously pursued other graduation pathways, moved to the LEA recently, and/or were identified as English learners.

- 22% were identified as English learners.
- 16% participated in the general assessment within the last five years.

- 10% moved into the district within the last five years.

In the review of 26 IEPs of students who participated after their sophomore year, other patterns emerged.

- 38% moved to I AM after sophomore year to receive the alternate diploma after a case conference committee found the student eligible.

2023-2024 was the first school year when every LEA in Indiana offered the alternate diploma to students. IDOE has maintained that only the most appropriate students participate in I AM; the case conference committee is the authority in determining eligibility. Additional information was provided in the request to manually move students to I AM after sophomore year. LEAs indicated students were previously pursuing the certification of completion; I AM is not required. It was reported that students were ill at the time of the assessment that took place during their sophomore year. Other students recently moved to Indiana. The field has been provided additional clarification via enhanced guidance to the field as a way to combat individuals taking this assessment unnecessarily.

During the 2024-2025 school year, there have been only 53 requests to allow students to participate in I AM after their sophomore year.

This [webpage](#) outlines the tiers of diplomas offered by IDOE. In each case, a case conference committee found the student’s needs were better met with the alternate diploma. Indiana has prioritized providing students with an education that is personalized for all students’ needs and relevant in today’s world. Tailoring diploma types to a student’s future is important to Indiana; with the latest work of Indiana’s Readiness Seals, a new opportunity exists for students to receive a direct path to success. The flexibility and variety of diploma types for students ensures the best fit for success.

Indiana’s growing number of diploma options—supported by initiatives like the Readiness Seals—allows students to pursue individualized graduation pathways that are tailored to their unique strengths, interests, and future goals. This increased flexibility ensures students are guided toward the diploma that best fits their needs and aspirations. As a result, with more appropriate and diverse pathways available, students are less likely to be placed on the alternate diploma track unless they genuinely meet the established criteria. This targeted approach supports more accurate placement decisions and promotes better long-term outcomes for all students.

**Table 8. Number of Students Receiving Alternate Diploma**

	2022-2023	2023-2024
<b>Alternate Diploma Holders</b>	303	695



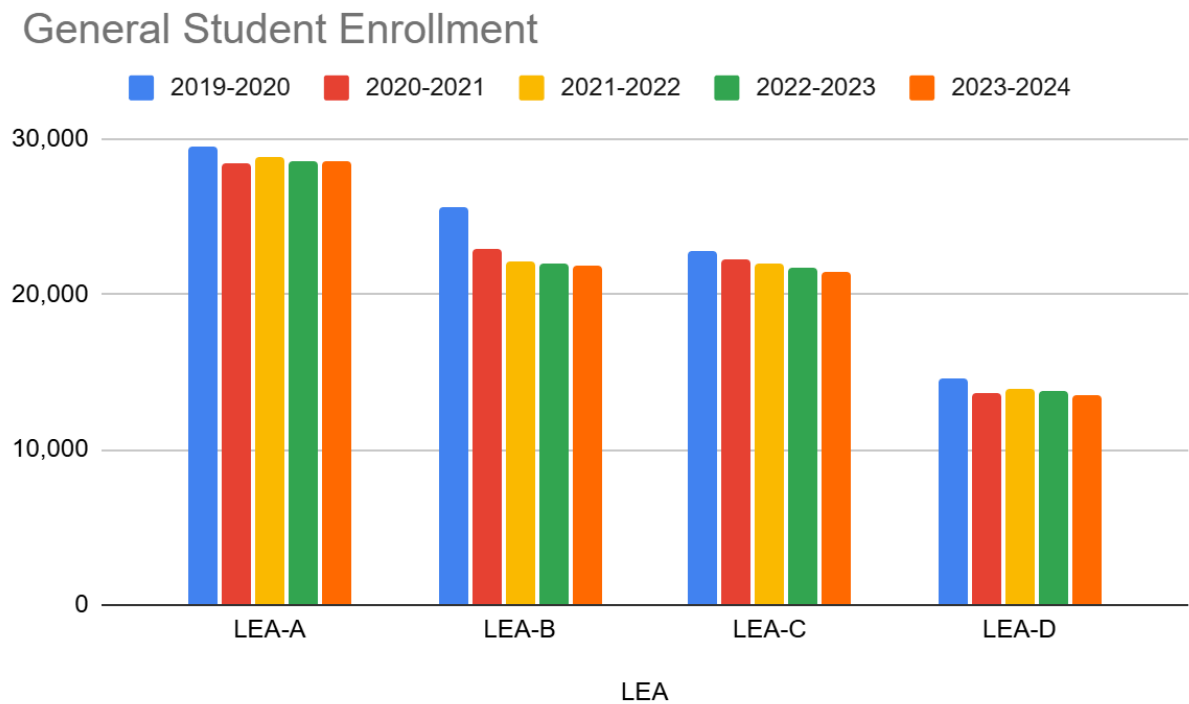
Enrollment

Enrollment has also impacted participation rates. Enrollment numbers were analyzed for five of the local education agencies with the most significant participation rates. It was found that while overall school enrollment decreased significantly, the special education enrollments were stable. Because the denominator of the participation rate decreased, the overall rate increased.

Table 9. General Student Enrollment

LEA	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	Difference
A	29,486	28,460	28,778	28,613	28,504	-982
B	25,611	22,930	22,115	22,027	21,858	-3,753
C	22,822	22,192	21,942	21,741	21,442	-1,380
D	14,642	13,674	13,940	13,787	13,524	-1,118

Table 9a. General Student Enrollment

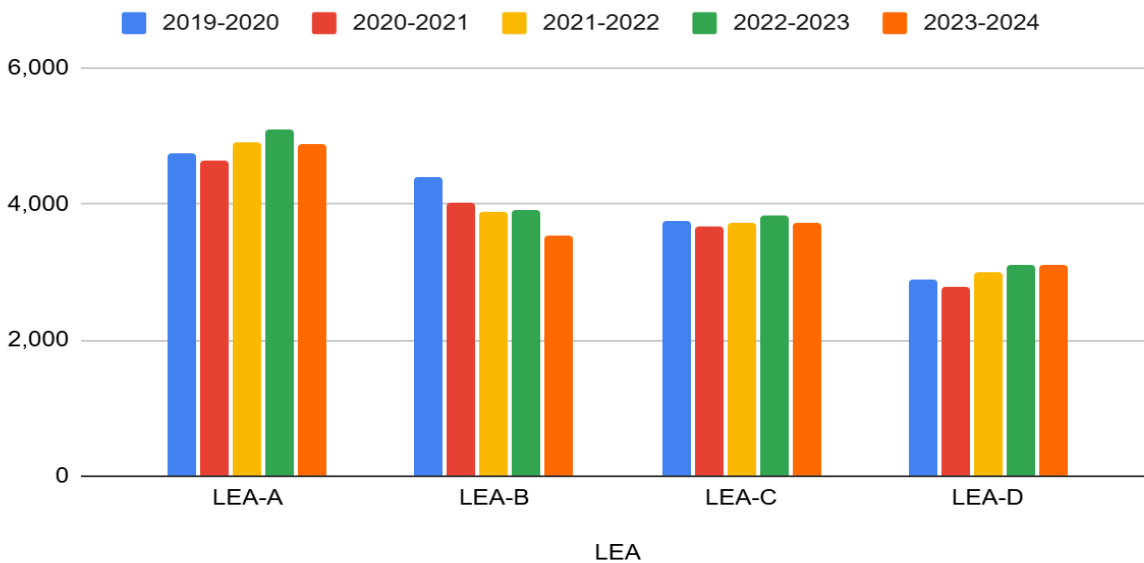


**Table 10. Special Education Student Enrollment**

LEA	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	Difference
<b>A</b>	4,741	4,648	4,894	5,101	4,882	141
<b>B</b>	4,382	4,020	3,874	3,921	3,534	-848
<b>C</b>	3,757	3,663	3,715	3,836	3,730	-27
<b>D</b>	2,886	2,792	2,983	3,091	3,113	227

**Table 10a. Special Education Enrollment**

### Special Education Enrollment



### Statewide Achievement Measuring at Least 95% of Students

Pursuant to waiver requirements under CFR 200.6(c)(4)(ii)(B), 95% of eligible students shall participate in the alternate assessment. The following table demonstrates data for achieving the 95% state-measured achievement requirement.

**Table 11. State-Measured Achievement Percentages: Grades 3-8 and 10**

Content Area	All Students Assessed	All Students Enrolled	State Measured Achievement	All Students with Disabilities Assessed	All Students with Disabilities Enrolled	State Measured Achievement
ELA	585,590	589,292	99.4%	100,893	102,508	98.4%
Math	585,219	589,184	99.3%	100,800	102,496	98.3%
Science	249,473	251,110	99.3%	41,844	42,485	98.5%

## Requirement Three: Alternate Assessment Participation Assurances

Pursuant to 34 CFR § 200.6(c)(4)(ii), IDOE must include assurances that it has verified that each LEA that anticipates assessing over one percent of its assessed students in any subject for which assessments are administered under [§ 200.2\(a\)\(1\)](#) that school year using an AA-AAAS:

(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 law taking an AA-AAAS;

Assurances and justifications were handled separately for the 2024-2025 school year.

## Assurances

LEAs that exceeded the one percent cap on alternate assessment participation during the 2023-2024 school year were required to complete the Alternate Assessment Assurance Survey in the winter of 2024 to assure IDOE that only the most appropriate students will participate in the alternate assessment in the spring of 2025. In the survey, LEAs indicated

1. If exceeding the one percent participation cap is anticipated, and
2. If local policies and procedures addressing disproportionality are adhered to.

LEAs responding received a response from IDOE. The responses were individual to the comment shared. LEAs must provide assurances for the following:

- Appropriate LEA staff (including special education teachers, general education teachers, building administrators, Corporation Test Coordinators [CTCs], School Test Coordinators [STCs], special education directors, and school psychologists) have viewed the [Alternate Assessment Participation Webinar](#) provided by IDOE. These stakeholders agree that the appropriate students will participate in the alternate assessment during the 2024-2025 school year.
  - Appropriate stakeholders (including parents of students with significant cognitive disabilities, special education teachers, general education teachers, building administrators, CTCs, STCs, special education directors, and school psychologists)

have reviewed the [criteria for determining I AM participation and](#) the flowchart, the participation [frequently asked questions](#) provided on IDOE’s [I AM webpage](#), as well as IDOE’s [Alternate Assessment ESSA 1% Cap webpage](#). Stakeholders agree that the appropriate students will participate in the alternate assessment during the 2023-2024 school year.

- Appropriate LEA staff (including special education teachers, general education teachers, building administrators, CTCs, STCs, special education directors, and school psychologists) have reviewed the 1% Disproportionality Data provided by IDOE. Stakeholders agree that any disproportionality will be addressed, and the appropriate students will participate in the alternate assessment during the 2023-2024 school year.

Assurances are publicly posted and can be found [here](#).

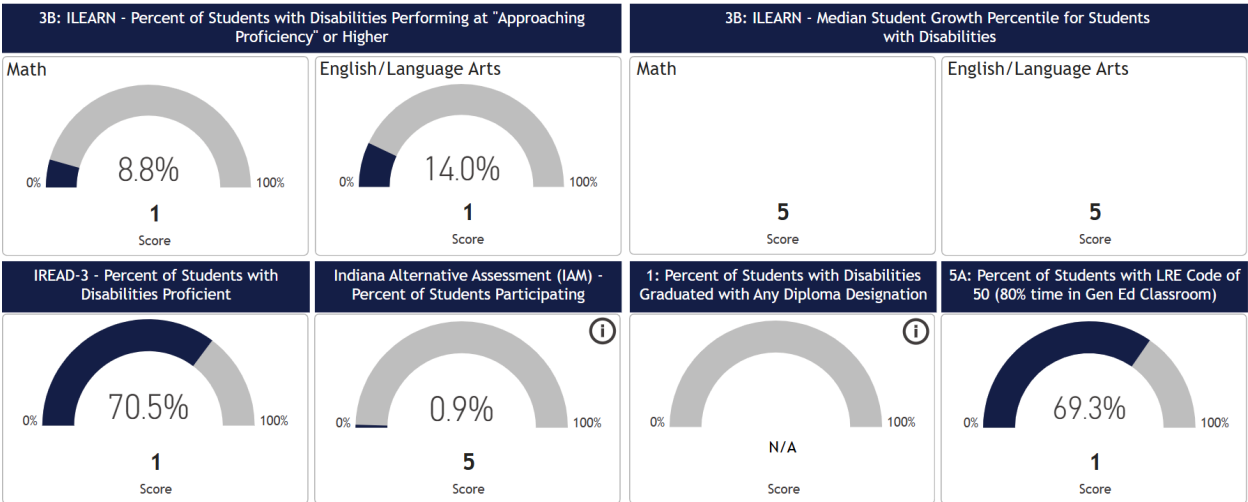
Justifications

A justification survey has been received from LEAs after the spring 2024 assessment window, requesting more information to support the final participation data. This survey required a submission of additional evidence to support the final participation rate and rationale for why the LEA exceeded the one percent I AM participation cap.

IDOE engaged in a targeted analysis that compared and contrasted the responses of each survey. Justifications were publicly posted and can be found [here](#).

Results Driven Accountability

Participation data is shared on the Results Driven Accountability (RDA) dashboard and illustrated below. The RDA dashboard and monitoring user guide can be found [here](#). Once data is publicly available for the school year on the RDA dashboard, LEAs then complete the assurances and/or justification survey to confirm data accuracy and rationale.



Disproportionality in Participation

Indiana will disaggregate disproportionality data based on participation rates from the 2023-2024 school year. IDOE utilizes a risk index to analyze this data for all student populations. Below is a list of student populations included in the analysis.

- 1. Racial/ethnic backgrounds:
  - a. American Indian or Alaska Native
  - b. Asian
  - c. Pacific Islander or Other Pacific Islander
  - d. Black or African American (not Hispanic)
  - e. Hispanic or Latino
  - f. White (not Hispanic)
  - g. Two or more races (multiracial, not Hispanic)
- 2. Identified English learner (EL): Yes or No
- 3. Socioeconomic status (as determined by free and reduced price lunch status): Yes or No
- 4. Gender: Male or Female

The state must ensure LEAs are aware of any disproportionality in the percentage of students in any one student population participating in the alternate assessment. Each LEA demonstrating disproportionality received a report of data and recommendations for best practices. This report was sent to special education directors on or around Thursday, May 1, 2025.

Disproportionality Analysis

An analysis of disproportionality demonstrated an increased number of local education agencies disproportionately identifying students to participate in the alternate assessment from previous years.

Table 12. Disproportionality in the Alternate Assessment, 2022-2024

Content Area	LEA Count 2022-2023	LEA Count 2023-2024	Difference
ELA	12	37	25
Math	12	56	44
Science	7	21	14

Table 12a. Subgroups with Most Significant Disproportionality in the Alternate Assessment

Content Area	Subgroup and LEA Count	Subgroup and LEA Count
ELA	Male, 27	Free and Reduced Lunch, 12
Math	Male, 23	Free and Reduced Lunch, 13
Science	Male, 12	Economically Disadvantaged, 7

## Requirement Four: State Plan and Timeline

34 CFR § 200.6(c)(4) requires a plan and timeline by which:

*“(A). The State will improve the implementation of its guidelines for participation in the AA-AAAS (including by reviewing and, if necessary, revising its definition of children with significant cognitive disabilities so that the State meets the cap in each subject in future school years).”*

- **Staff Training:** IDOE staff engaged in bi-monthly participation in the National Center on Education Outcomes (NCEO) Community of Practice beginning July 2023. This is an ongoing initiative.
- **Office Hours:** IDOE staff offer monthly office hours sessions, which began in August 2023..
- **I AM Question and Answer (Q&A) Sessions:** Two Q&A sessions were held before the opening of the I AM spring assessment window on March 13 and 14, 2024.
- **Additional Informational Presentations:** IDOE staff offer additional presentations for targeted training each year. In November 2024, staff presented with IN\*SOURCE, a parent advocacy group, to outline procedures for the alternate diploma for students with significant cognitive disabilities. In September and November 2024, state staff presented ELs with Significant Cognitive Disabilities, consisting of [part one](#) and [part two](#), to stakeholders in the field to inform teachers and administrators in decision-making when supporting students in this subgroup. Each of these items was created after receiving feedback from the field.

IDOE's monthly I AM office hours sessions were well attended by multiple levels of education professionals, including new teachers, test administrators, and seasoned administrators. A joint effort by IDOE's Office of Special Education and the Office of Student Assessment targeted discussions among these groups to find the best topics for the field. Feedback was considered from last year's assurances, where educators completed a brief survey on the topics most desired to support instruction and behavior of students with significant cognitive disabilities. Examples include the taxonomy of interventions, unpacking the Content Connectors, disproportionality, progress monitoring, and identifying students with significant disabilities.

Additional efforts for monitoring include desk audits and soliciting the field for public comments. Public comment was received from stakeholders (i.e., educators and families) in September 2024 and again in May of 2025. Requesting public comments ensures the waiver extension request is in the best interest of the field and stakeholders. Desk audits ensure students participating in the alternate assessment are appropriately identified in the student's IEP.

*B) The SEA 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 with an AA-AAAS to ensure that only students with the most significant cognitive disabilities take an AA-AAAS. 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 so that all students are appropriately assessed.”*



*“(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;”*

A risk index of 2.0 is used to measure significant disproportionality. The results are shared with LEAs in the same month they are collected. Where disproportionality exists, LEAs are asked to review the provided data and consider their student demographics, ensuring policies and procedures do not result in overrepresentation or underrepresentation of any subgroup.

## Alternate Assessment Participation Criteria

The criteria for participating in the alternate assessment were revised for the 2022-2023 school year and can be found on IDOE's [I AM webpage](#) and [Accountability Dashboard webpage](#). The criteria are as follows:

1. A review of the student's record indicates a disability that significantly impacts intellectual functions and adaptive behavior. Adaptive behavior is defined as essential for someone to live independently and to function safely in daily life.
2. The student requires extensive, repeated, individualized direct instruction and substantial support that is not of a temporary nature.
3. The student requires substantially adapted materials and individualized methods of accessing information in alternative ways to achieve measurable gains on the state academic content standards for the grade in which the student is enrolled.

This information and the I AM Participation Decision Flowchart for LEAs are available in both [English](#) and [Spanish](#). IDOE also developed a frequently asked questions resource for additional support in both [English](#) and [Spanish](#).

## LEA Support and Oversight

In its commitment to ensuring that only students with the most significant cognitive disabilities participate in the alternate assessment, IDOE's plan aims to provide data to LEAs regarding alternate assessment participation and preparation. In doing this, LEAs can provide sufficient training to support special education staff in allocating assessments to students appropriately.

## Universal LEA Support Efforts

Indiana's RDA determination includes alternate assessment participation as a subcomponent within the calculation. LEAs are informed of the possible points in each category, how many points their district received in those categories, and an overall percentage that correlates to a tier of technical assistance in the [guidance document](#). Alternate assessment participation data is included in the data review. Indiana resource centers will also provide support to LEAs that exceed the one percent cap. Technical assistance may include onsite visits, webinars, emails, and/or phone calls. This [presentation](#) was created to explain the calculation to stakeholders. A participation rate of less than or equal to 1.0% will yield a score of five.

- A participation rate of more than 1.0% but less than 1.02% will yield a score of three.

- A participation rate of greater than 1.02% will yield a score of one.

Additional universal efforts include IDOE’s [monthly I AM office hours](#), weekly I AM listserv newsletters, professional development, and the statewide conference [Elevating Education: Improving Outcomes for All](#), which was held in December 2024.

As previously mentioned, IDOE also meets with the parent advocacy group IN\*SOURCE annually. In the 2023-2024 school year, a session was held to discuss the alternate assessment via IDOE’s digital learning platform, the [Indiana Learning Lab](#). An IDOE intense intervention specialist also met with IN\*SOURCE in November 2024 to discuss the alternate diploma with stakeholders.

Additional efforts are listed below:

- IDOE’s Office of Student Assessment hosts general monthly Certified Test Coordinator office hours to offer tailored support for statewide assessments, including I AM.
- The Indiana Learning Lab provides various [professional learning communities](#), including a special education group, with weekly resource dissemination and discussion threads.

Targeted LEA Support Efforts

IDOE requires specific activities for LEAs exceeding the one percent cap through a targeted monitoring program. In addition to considering participation percentages for monitoring, IDOE also considers student counts, as some LEAs with small populations may have a high participation rate due to calculations. These student count parameters will be adjusted annually to address the needs of Indiana LEAs.

Participation must adhere to the three criteria outlined by IDOE, and it must be clear from the IEP that the student meets these criteria. The case conference committee (CCC) for the student ultimately makes the decision to move students to the alternate assessment, and this monitoring cannot challenge a CCC decision, but evidence and justifications can be requested by IDOE to ensure that decision-making adheres to the identified criteria.

Table 13. Monitoring Level Tiers and Required Activities

Monitoring Level	Minimum Percentage	Participation Count	Activities
Tier 1	1.1%	N/A	<b>Announced:</b> Office Hours
Tier 2	1.1%	20-99	<b>Invited:</b> Learning Lab, Office Hours
Tier 3	1.1%	100 or More	<b>Required:</b> Learning Lab, Office Hours, IEP Reviews

For the Tier 3 monitoring level, IEP reviews consist of five IEPs of students who participated in I AM selected at random by IDOE. IDOE reserves the right to perform more in-depth monitoring, as needed. A Tier 3 LEA that demonstrates significant unresolved and/or consistent concerns related to this monitoring and the application of practices may be required to participate in a one-on-one meeting with IDOE in person. The decision to move a student to the alternate assessment is made by

the CCC after a targeted review. Any LEA that exceeds the cap receives support in understanding the eligibility criteria; it is not assumed that an overage in participation is an error but rather an opportunity for more discussion. A toolkit will be developed to support LEAs and families in decision-making and ensure only the most appropriate students will be participating in the I AM.

### Components Timeline

IDOE provides annual [I AM Milestones](#) to provide a detailed timeline of events before, during, and after the annual alternate assessment. It is the responsibility of the LEA to ensure that all tasks and deadlines are monitored and completed to ensure that the assessment is administered with fidelity. This includes ensuring staff members are properly trained, accommodations are confirmed in the testing system, and all needed materials are provided.

### Targeted Monitoring Plan for 2024-2025 and Beyond

Planned monitoring activities to support the findings outlined in this waiver extension request include the release of updated guidance for the field:

- A crosswalk outlining participation criteria to assist stakeholders in making informed decisions about student placement on the alternate assessment.
- A graduation pathways toolkit that provides guidance on the alternate diploma, supporting case conference committees in making well-informed decisions.

These resources will be introduced to stakeholders through online and in-person training sessions. The materials are designed to serve as practical tools, ensuring that all parties are well-informed and that each criterion is carefully considered to support the best possible outcomes for students. The monitoring team holds the expectation that providing technical assistance to the field will significantly reduce the statewide participation rate.

## Requirement Five: Substantial Statewide Progress

As required in 34 CFR § 200.6(c)(4)(v), the state must demonstrate substantial progress toward achieving each component of the prior year's plan and timeline in the following areas:

*“(A)... improve the implementation of its guidelines for participation in the AA-AAAS. Guidance is available online through a flowchart and an FAQ for decision-making and is evaluated each year for the need to update to improve implementation and ensure student outcomes are appropriate for each student.*

*“(B) ... support and provide appropriate oversight to each LEA that the State anticipates will assess more than 1.0 percent of its assessed students with an AA-AAAS to ensure that only students with the most significant cognitive disabilities take an AA-AAAS.”*

IDOE's Office of Special Education implements targeted IEP reviews for students participating in the alternate assessment. LEAs also provide their justification and assurances that only students meeting the criteria will participate.

*“(C) ... address any disproportionality in the percentage of students taking an alternate assessment aligned with alternate academic achievement standards.”*

IDOE has accomplished substantial progress toward meeting the one percent cap for the alternate assessment since the submission and approval of the original waiver request in 2016. This advancement is evident in I AM participation data and completion of state plan and timeline activities outlined in this year’s waiver extension request. A comparison of 2016 through 2024 data confirms Indiana’s progress toward reducing the number of students participating in the alternate assessment.

IDOE’s Office of Special Education collaborated with the Office of English Learning and Migrant Education to create technical assistance for the field to guide decision-making in placement and instruction for students who are identified as ELs and students with significant cognitive disabilities. Table 13 indicates that Indiana has made consistent progress in reducing the participation rate since the beginning of monitoring, 2016-2017.

Participation Analysis

Table 14. LEAs Exceeding One Percent Cap: 2016-2017 to 2023-2024

Content Area	2016-2017	2017-2018	2018-2019	2020-2021	2021-2022	2022-2023	2023-2024	Difference from 2016 to 2023
ELA	190	186	166	146	142	147	183	-17
Mathematics	189	186	165	144	142	146	182	-7
Science	183	183	153	149	134	160	167	-16

Training and Additional Guidance

IDOE Support and Guidance for I AM

The following resources are developed to support educators and LEAs in overseeing administration and determination for participation in the alternate assessment.

**Accessibility and Accommodations Training:** IDOE provides accessibility and accommodations training overviews for statewide assessments, including the [Accessibility & Accommodations for Statewide Assessments](#). This document includes topics such as universal accessibility tools, designated accessibility tools, and accommodations available to students. Viewing this training is an annual requirement for Test Administrators (TAs) and CTCs.

**Statewide Assessment Webpages:** IDOE’s [Assessment webpage](#), [I AM webpage](#), and [Indiana Assessment Portal](#) house information, resources, training materials, and links for special education professionals supporting students with disabilities. The webpage and portal are updated throughout the school year to provide the most relevant information regarding I AM.

**CTC Pretest Workshops:** IDOE’s Office of Assessment provides pretest workshops for all statewide assessments before the opening of the testing window. For I AM testing, the Spring 2024 Pretest

Workshop contains important administration information for CTCs to prepare their corporation for testing. This workshop is held annually in the Moodle Test Coordinator Corner and began on February 7, 2025.

**PowerSchool:** IDOE's Office of Special Education has elected to use a new vendor for the management of IEPs. In the 2023-2024 school year, multiple strategic meetings have occurred to discuss the needs of the state to ensure accurate reporting and service provision for students and staff. The discussion has addressed the needs of students with significant disabilities, specifically, students participating in the alternate assessment, and how to best capture the needs of these students and record their participation in I AM. Stakeholders have been invited to trial the selected portal, PowerSchool, and share feedback. PowerSchool is expected to go live for statewide IEP implementation for the 2025-2026 school year.

**I AM TA Certification and First Year I AM TA Training:** TAs administering the I AM assessment must complete annual recertification requirements. The I AM TA Certification Course is assessment-specific and becomes available on the [Indiana Assessment Portal](#) in January. Additionally, TAs administering I AM for the first time must have completed a first-year training webinar, which will be held in February. The recording of the live training will be available on the Indiana Assessment Portal.

**Understanding I AM Webinar:** Each year, IDOE and Cambium Assessment, Inc. (CAI) release a webinar providing an overview of the assessment titled [Understanding I AM](#). The targeted audience is educators, administrators, and other school personnel involved in the administration of the alternate assessment, and this webinar is housed on the Indiana Assessment Portal. The recording was made available online in October.

**Q&A Sessions:** IDOE's two Q&A sessions address the field's frequently asked questions (FAQs) regarding the administration of I AM. Any administrator or educator can attend one of these live webinars. The 2024-2025 I AM Q&A sessions were hosted on February 3, 2025. The sessions were recorded and shared with CTCs in listservs from IDOE

**I AM Practitioner Virtual Panel:** Stakeholders in the field participated in a virtual panel to provide feedback on the through-year design of the new I AM. Individuals participated in discussions on test items, test format, accommodations, and accessibility. These meetings were held monthly.

**Office Hours:** IDOE's monthly office hours sessions cover general and specific guidance for educators. Content is based on requirements by the field and needs to be identified through the review of data. Sessions were held September 6, 2023, October 4, 2023, November 1, 2023, December 6, 2023, January 3, 2024, February 7, 2024, March 6, 2024, April 3, 2024, and May 1, 2024.

**I AM Participation Guidance:** IDOE sought input from stakeholders on the participation criteria documents, including Participation Guidance in [English](#) and Spanish and Participation FAQ in [English](#) and [Spanish](#). These documents explain participation in the alternate assessment and are posted on IDOE's [I AM webpage](#).

**Indiana Learning Lab:** IDOE partners with FiveStar, an educational technology solutions organization, to oversee the Indiana Learning Lab, a digital learning platform to support teachers and staff directly in the field. The Indiana Learning Lab empowers specific communities of practice to

initiate discussions and share resources. IDOE disseminates weekly posts regarding high-leverage practices, RDA, indicators, monitoring supports, and other relevant information to the field. The Learning Lab has been utilized to share important guidance to the field related to No Mode of Communication (NMC), an important concept for testing administrators related to students who may appear to have no observable means of communication and will participate in the alternate assessment. This online forum will continue to be used to educate the field on procedures related to the alternate assessment participation with topics such as selecting appropriate students for the alternate assessment, criteria for participation, required justifications and procedures related to the IEP, information on supports and services, and information on the state alternate achievement standards (i.e., Content Connectors).

**New Directors Training:** IDOE held New Directors Training for special education directors in July 2024 for the 2024-2025 school year. This in-person training introduces new directors to the policies and procedures related to I AM and support for students with significant cognitive disabilities.

**Accessibility and Accommodation Information for Statewide Assessments:** IDOE updates its [Accessibility and Accommodations Information for Statewide Assessments](#) annually to coincide with the new accommodations offered for statewide testing. This guidance is available on IDOE's [Assessment webpage](#). Schools may review this for more information on new and updated accommodations for the 2024-2025 school year.

**The I AM Blueprint Stakeholder Collaborative:** Indiana's Content Connectors was adopted in Spring 2024. Indiana will be moving to a through-year assessment for I AM to coincide with the general assessment, ILEARN Through-Year assessment. IDOE conducted an I AM blueprint committee on November 4, 2024, for a targeted discussion on the curriculum pacing of Content Connectors to develop a testing blueprint for the new assessment.

**Content Connectors Revisions:** Following the reduction and [streamlining of the Indiana Academic Standards](#), the Indiana Content Connectors were reviewed and adjusted accordingly. IDOE staff, consisting of content experts and special education specialists, reviewed the Content Connectors for vertical alignment and accessibility for the intended population. Standards were then reviewed by educators from the field and will be presented for public comment in the coming months before formal review from the Indiana State Board of Education. Currently, frameworks are being developed to support educators in facilitating these in instruction.

**Test Items Review:** Following a formal analysis from stakeholders consisting of assessment experts, field experts, and special education specialists, Indiana is leveraging the opportunity to develop a revised alternate assessment format to consist of a through-year design for ELA and Mathematics. Following this determination, test items are currently under review for alignment. This new, through-year format intends to better measure students' performance and needs to allow timely data that can further support areas of greatest need.

**Content Connectors Frameworks:** The Office of Special Education collaborated with the Office of Teaching and Learning to create Content Connectors Frameworks. The frameworks are intended to guide best practices in instruction and translate standards into learning opportunities for students participating in I AM. Content Connectors are Indiana's alternate standards aligned with the 2023 Indiana Academic Standards and are designed to measure the knowledge and skills of students with



significant cognitive disabilities. Alternate standards are necessary to ensure all students have access to grade-level-aligned content and to achieve educational accountability for all students.

IDOE collaborates with key stakeholders, using diverse feedback to improve the accessibility, accuracy, and usefulness of alternate assessment training resources. By ensuring that these resources contain relevant information for educators and school decision-makers and accurately reflect legislation surrounding the alternate assessment, Indiana can continue to reduce the participation rate for I AM. Resource engagement is carefully monitored, and IDOE works to incorporate feedback into improving these practices.

## Collaborative State Efforts

Below is a summary of resources and activities to support the appropriate determination of participation in the alternate assessment.

- **IDOE's Alternate Assessment Specialist and Accessibility and Accommodations Specialist:** These two specialists exist in the Office of Student Assessment to serve as liaisons between LEAs on I AM and accessibility needs. Specialists work closely with the intense intervention specialist in the Office of Special Education to oversee appropriate participation in I AM. The Office of Student Assessment also contracts with a nationally recognized accessibility expert to provide guidance and input on policies and procedures. A statewide advisory group of various special education and accommodations stakeholders meets twice a year to review policies and procedures.
- **IDOE's Intense Intervention Specialist:** This role leads efforts related to the one percent cap, participating in training by the National Center on Educational Outcomes (NCEO), monitoring participation data to create resources, and developing programming based on the tiered intervention system of supports. This specialist audits districts exceeding the one percent cap and oversees interventions.
- **IDOE's Technical Assistance Specialists:** These specialists assist the field in supporting students of specialized populations, which include students with low-incidence disabilities. These specialists collaborate with federal resource networks such as the TIES Center, the National Technical Assistance Center on Transition (NTACT), and NCEO to support students, families, and educators.
- **Multi-State Collaborative Groups:** IDOE participates in the NCEO one percent cap community of practice bi-monthly webinars and the Council of Chief State School Officers (CCSSO) State Collaborative on Assessment and Student Standards (SCASS) Assessing Special Education Students (ASES) meetings.
- **Teaming Up for Student Success (TUSS) Best Practices for Students with Disabilities Who Transitioned from Alternate Assessments to General Assessments:** Indiana has elected to participate in the TUSS study that analyzes the process of transitioning students from the alternate assessment to the general assessment and aims to find best practices for educators to increase the number of students making this transition, where appropriate. This

study has not been funded yet. The University of Minnesota/NCEO will notify IDOE when funding is available, and then the work will begin.

- **Peer Learning Groups Effective Communication of Assessment Data:** The intense interventionist has participated in a peer learning group facilitated by the University of Minnesota/NCEO to support state education agency (SEA) staff in providing assessment data to stakeholders using methods that are meaningful and accurate. Topics include considering the stakeholders' present level of understanding and using accurate terminology and strategies to enable understanding.
- **Education Peer Action Learning (PAL) 2024 Cohort:** IDOE participated in an in-depth learning opportunity to advance their knowledge base and skills in the provision of assistive technology to establish a collaboration/partnership with their respective SEA.
- **Stakeholder Feedback:** IDOE shares information, collaborates, and seeks feedback from stakeholders regarding the one percent cap on alternate assessment participation. Stakeholders include LEAs, Indiana's Council of Administrators of Special Education (ICASE), State Advisory Committee (SAC), IN\*SOURCE, IDOE's Office of Student Support and Accessibility, and IDOE's Assessment Implementation Advisory Group (AIAG). AIAG is a small group of administrators and data managers that meet monthly to discuss updates for assessments, provide feedback on procedures, and review information regarding legislative changes and research being completed.
- **National Technical Assistance Center on Transition (NTACT), Complex Support Needs Community of Practice Group:** IDOE's intense intervention specialist participated in monthly meetings facilitated by NTACT to address the needs of college students with complex support needs. Content provides information that can be applied to high school students to improve support before college and ensure the best outcomes for students with significant cognitive disabilities.
- **How Educators Can Help Students with Intellectual Disabilities Think College:** IDOE's intense intervention specialist participated in this nationwide training facilitated by the Council for Exceptional Children that provided training in December of 2023 on how to engage students with significant cognitive disabilities in the concept of postsecondary education.
- **CCSSO ASES Virtual Collaborative:** IDOE's intense intervention specialist participated in a nationwide virtual collaborative on assessment to learn from other intense intervention specialists across the country and improve monitoring practices in managing the one percent participation cap. This occurred in February of 2024.
- **Indiana Council of Administrators of Special Education (ICASE) Town Hall:** ICASE facilitated a one-day meeting in February of 2024 with special education professionals across the state to make introductions of the state staff, provide a forum for asking and answering questions, and provide the field with information on upcoming changes.
- **IEP Technical Assistance (TA) Center State Conference:** The IEP TA Center facilitated a statewide conference for Indiana's education professionals called *Elevating Education*, which was held in November 2023 and 2024. IDOE's intense intervention specialist presented with a

colleague from the Office of Special Education on unpacking the Content Connectors, which provided understanding and assistance in using these standards for instruction.

- **Three-Year Review Process for NMC Guidance:** IDOE has shared guidance within the [Indiana Assessments Policy Manual](#) regarding the three-year review process and IEP audit for students with NMC.
- **Indiana's Special Education Annual Determination:** As part of the state's general supervision system, each LEA is assigned an annual determination that includes measures of compliance, results, and data timeliness. The results measure consists of growth and proficiency on the general assessment and participation in the alternate assessment. Indiana achieved the "meets requirement" from the U.S. Department of Education following the previous SPP/APR submission.
- **IEP Data and the Test Information Distribution Engine (TIDE):** IEP data from Indiana IEP, along with the testing information platform TIDE for the I AM assessment, reinforce information regarding what students should be tested using the alternate assessment.
- **INDATA:** IDOE's intense intervention specialist is a member of the INDATA advisory council. Easterseals Crossroads partnered with IDOE and the Bureau of Rehabilitative Services to establish the Indiana Assistive Technology Act (INDATA) Project. The INDATA Project is one of 56 similar federally funded projects designed to increase access and awareness of assistive technology. Quarterly meetings include discussions on how to support students with significant cognitive disabilities through the use of technology.
- **Indiana School for the Blind and Visually Impaired, School Board:** IDOE has a Director designee serve on the board. This collaboration provides a direct connection between IDOE and the school's stakeholders, as well as extra guidance for students statewide with sensory loss.
- **Center for Deaf and Hard of Hearing (DHH) Education Roundtables:** IDOE's intense intervention specialist also participates in roundtable meetings with DHH educators and speech-language pathologists that serve students around the state.

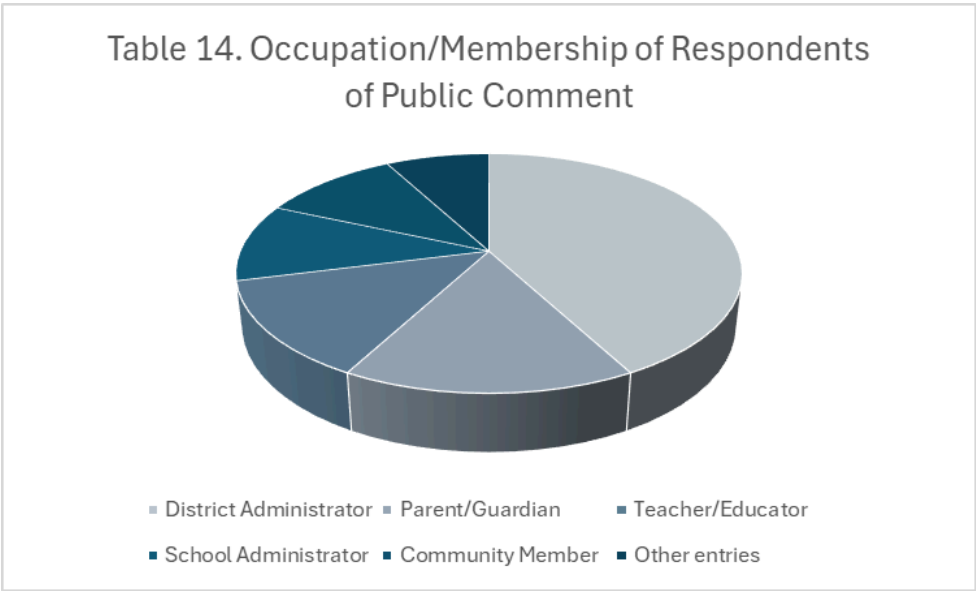
Indiana has diligently worked to improve the participation rate in the alternate assessment since the 2016-2017 school year. Through new and continuing initiatives, Indiana will continue to persist in holding LEAs accountable and projecting high expectations for students with significant cognitive disabilities.

## Appendix A: Public Comment & Response

IDOE provided direct information to stakeholders via email regarding the changes pursuant to ESEA §111(b)(2)(D) and 34 CFR 200.6(c) and (d) to the one percent cap on alternate assessment participation, a copy of the initial Indiana 1% Cap Waiver Extension Request, and guidelines for submitting comments through the online form. Due to an inaccurate link to a previous waiver, the public comment survey was updated with the last approved waiver and resubmitted in April of 2024. The updated link can be found [here](#). The responses from the subsequent public comment solicitation are also shared below.

Stakeholders included, but were not limited to, certified test coordinators and special education directors. To ensure public access, a copy of the Indiana 1% Cap Waiver Extension Request and guidelines for providing comments were posted on IDOE’s [Alternate Assessment ESSA 1% Cap webpage](#). An invitation to comment on the Indiana 1% Cap Waiver Extension Request was included in [Dr. Jenner’s Weekly Updates](#) and IDOE’s [Office of Special Education Newsletter](#). IDOE allowed two weeks for public comment, and responses can be found below.

Table 15. Occupation/Membership of Respondents of Public Comment



“Thank you for taking the time to read my concern. I work in a cooperative that services three smaller (two being rural) corporations. The LEA is in a town and this is where cooperative programs for more significant needs are housed. Additionally, the LEA has a higher population and the impression in the community is that they staff more for unique needs. I regularly hear in the community and read on community social media recommendations to parents that if your child has any struggles, they need to go to X corporation (the LEA). Parents want to have their students go where they feel there are the most resources, so we have a high number of cash transfer requests. Therefore, the LEA exceeds the 1% annually. I have worked with the DOE to ensure that it isn't a matter of how we are reporting some of the shared students' scores with their home corporations and I haven't gotten a clear answer on that and other directors have reported they have had similar experiences. Again, thank you for your time.”

“I don't agree that there should be a 1% cap on the number of students that can be assessed by IAM. Public schools don't turn students with special needs away so it is not in the corporations' control how many students fall into an eligibility category. If there happens to be a large number of students who have been labeled, how is a school or corporation supposed to explain to a parent that their student has to take the general education assessment (ILearn) because of a 1% cap??? How is it determined which student has to be moved from IAM to ILearn because of a 1% cap? Students shouldn't be penalized because of their disability. The 1% cap has the possibility of doing just that.

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*So, yes, the waiver should be extended if there aren't changes to the 1% cap. Corporations, schools, and students should not be penalized due to the number of students eligible to take the IAM assessment. Schools should not be forced to require students who are incapable of success on the ILEARN to take the general education assessment."*

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*"I am in agreement that Indiana submit this waiver. The number of young children with significant delays continues to grow and 1% is not a true reality."*

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*"I would like to advocate for a waiver extension on the number of students who can be tested using an alternate assessment on annual statewide tests. Over the past several years in our school districts, we have noticed a substantial increase in the number of students with significant disabilities who benefit from the alternate assessment vs. the regular state assessment. We receive a number of students with significant disabilities through open enrollments into the district, as well as many students who are found eligible with a significant intellectual disability and/or autism. As evaluations are completed, the number of students with higher needs has greatly increased over the past several years."*

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*"I support the waiver extension application. Thank you for your hard work and dedication to our students."*

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*"Our district is currently above the 1% cap for I AM assessments, largely due to higher poverty levels and the specialized resources available that attract families to our area. Many of our students move in with IEPs already in place that require I AM assessments. Additionally, our proximity to the Illinois border significantly impacts this trend. In Illinois, many students are required to travel long distances, often involving lengthy bus rides, to access specialized services outside their home schools. This creates a strong incentive for parents to move to Indiana, where their children can receive the necessary services within their local schools, resulting in a more accessible and inclusive educational environment."*

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*"The number of students needing to access this waiver is above the 1% cap. This is an arbitrary number set that is set with no corresponding data with each school such as residential homes in the school district, out-of-school placements by DCS, move-ins from out of state. Additionally, the a school system has no was of adjusting the number of students who live and/or move into their district who meet this criteria. Thus, the 1% cap is an unrealistic criteria since schools have no ability to control the population who truly meet this criteria. Either a student does or does not and if they do, whether that puts a school above the 1% or not, that has no bearing on what is best for the student. And, ultimately, as educators, what is best for the student is what we are challenged to provide."*

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*"While I understand the recommendation for a 1% cap, that may not represent a district's student population. Districts should be trusted to make data driven decisions while considering students' unique strengths and needs. If a district or the state of IN exceeds the 1% cap, that should be OK. If there is a pattern, then a review should occur."*

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*"IDEA gives each IEP team the authority to determine what is appropriate for each individual student. Decisions at that level are not to be influenced by programmatic capacity but rather the needs of the student. An LEA cannot say, "we don't do that here" when it comes to providing for the student a program that has been determined by the IEP team to be appropriate and calculated for educational benefit. The idea of an arbitrary 1% limit on students who have been determined to be best served in alternative programming and assessment is inconsistent with the decision rights that have been provided to the individual IEP teams. The history of establishing the 1% limit was more of an administrative assertion than a statistical finding and is lacking the*

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*precision by which slight variances could be justified as significant. Has there been any research to maintain this precise cutoff that has existed for nearly two decades?"*

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*"I am in support of the waiver. While I understand and applaud the efforts of the federal government to promote LRE, it is simply not appropriate nor ethical to relagate the number of students taking the alternate assessment to a specific percentage. First of all the definition of "most significant cognitive disabilities" is very loosely defined. Secondly, our district (including many others in Indiana) take careful consideration and deliberation over the determination for participation in alternate assessment. It is NOT a decision that is taken lightly- however, if we, as a school team have gone through the criteria and HAVE the data to substantiate the alternate assessment/alternate diploma, a case conference decision SHOULD be enough. We are supposed to make data-based decisions...NOT quota-based decisions."*

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*"We are the largest public school system in the state. We have had a major increase in students who need to take IAM that just entered school after being in ABA centers for years. This will put us over the 1%."*

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*"Our district cannot control who moves in and what they may need to support their learning needs. If we have over 1% of students move into our district who are significantly behind grade level due to their disability, we have zero control on the appropriate assessment unless we place them on a pathway that is not appropriate only to meet some standard. That is harmful to students and prohibits them from making progress."*

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*"In our small district, the overall number is low for the total student population. Of this data, our numbers as a whole are not growing much. However, the number for special education has grown significantly. With this being said, the students we are serving are requiring more and more services as the needs of each individual increase. I am an essential skills teacher who supports a greater than 1% cap for districts."*

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*"Due to the small size of our rural school district we are not able to stay below the 1% threshold for alternative testing. Our students that take the alternative assessment are of high need and for a few of them medical conditions do not make it a possibility for them to take other state standardized testing. We ensure that when the decision is made for students to take alternative testing that discussions have been held with families and that it is what is best for the student."*

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*"The 1% waiver extension is absolutely necessary. Our students deserve to take a test that is most appropriate for their academic path."*

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*"1% is an arbitrary number. When students meet criteria for alternative assessment and the case conference committee deems it appropriate, that student needs to take the alternative assessment. The process in decision making should be monitored, not some random percentage."*

*"I strongly feel the members of the CCC know the student best and what is best for him or her. We as professionals and family members should have the freedom to place on the alternative testing track because it's what is best for him or her, not because we aren't allowed as it would exceed 1%. Let's do what is right for kids".*

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*"I checked 4 items since they all applied to me at one time or another. In addition, my husband's sister had Down Syndrome and was mildly mentally retarded. She was in public school for awhile and then the School of Hope a couple years in Wabash county. Later she lived in a group home in Wabash and worked at the Sheltered Workshop. Even the thought of the "lostness" she endured in P.S. makes me cringe. To expect her to participate in such tests as you're describing would be unfair to her, to the teachers. What a complete and total joke our current legislature is turning our state's education into. (Same goes for the US Congress.) They want*



*everyone uneducated and stupid so they can undermine our democracy. Sorry for the rant but we must be very vigilant or all will be lost."*

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*"While I agree for the state of Indiana to submit a waiver request for the ESEA's cap of 1% of students with disabilities taking an alternative assessment, the state of Indiana must also put into their IEP system the programming of an OPT OUT/refusal option and develop the procedures and policy for parents to Opt Out/refuse state standardized assessments. The continued historical bullying of parent's federal rights to refuse state standardized assessments by IDOE by not developing the federally allowed policy/procedure and stating no policy exists must stop. Develop the Indiana Opt Out/Refusal of assessments policy NOW and program the option within the IEP system."*

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*"We are slightly above 1% due to the small number of students in our district. We have also had a lot of move-in students who came in with the alternate assessment option."*

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*"The 1% cap is arbitrary and forces schools and districts into recommending less-appropriate services for students."*

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*"With the addition of the alternative diploma, this will likely increase our students taking the alternative assessment. As there was not alternative assessment requirement with the CoC previously, if students were not given this but were not capable of meeting requirements associated with the general diploma we could still give them a completion "diploma". Now that this is a requirement for these students we are going to have more students even in 11+ grade who started in general assessments but through reevaluation and CCC decisions have been moved to the alternative diploma. We have a large intensive interventions population due to the makeup of our district. The number of our locally created CoC students is our 1%, giving us really no room for our Alternative Diploma students."*

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*"Based on the data within my school corporation, we will be above the 1% cap for the alternate assessment. We have had a lot of students move into the district that qualify for the alternate assessment."*

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*"I AM count should be based upon the school's SE population and NOT on a set percent across the board."*

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*"I have had the privilege to give the assessment to students in the past three years. I am thrilled there is another type of assessment for our students in life skills but the cap doesn't seem appropriate. We may have 5 students one year then have up to 10 another year who struggle already on the alternative assessment then to say we have to have a cap is worse. It breaks my heart each time I administer the test as the student struggles to do the assessment and is frustrated because they can't read or comprehend what it is asking based on their IQ then to turn around and decide who is the lowest to make the 1% cap is even worse. We don't just put students on this form of assessment. Students have IEPs that state they are life skills bound which should be enough for the students to be granted this alternative assessment if we aren't going to waive them from the standardized tests we give. They have daily struggles the way it is then to put them through this and then to say there is a cap is frustrating. I have a student who wants to be like the other kids so bad and wants to read but can't no matter how hard he tries. Then we say take this test but you may have to take the other version because we have a cap. I am not sure those who make this benchmark have ever given the alternative assessment to students in life skills or there is no way they would think this is a good idea. Thanks for allowing us to share our concerns."*

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*"I feel strongly that we need this waiver in place. Having worked with students with disabilities in the community and in schools I have found that for many, the alternate assessment is absolutely necessary and still challenging. To think that we cannot exceed 1% when we are seeing a significant increase in students with*

*autism and more significant needs is a failure on our part as a state. We must do what is best for children and an alternate assessment for some is necessary to cut down on the stress and anxiety that testing causes. It is great to have high expectations but we must also be realistic. I am 100% in favor of the waiver."*

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*"What criteria was used to determine 1% as cap? The way the 1% is calculated is misleading--it's 1% of a tested grade level, not 1% of the district's overall K-12 population. Uneven distribution of alternate testers in particular grade levels can make compliance difficult for small districts. Do we force students on alternate diploma tracks to take ILEARN/SAT simply to meet a quota? In theory, these students should then be placed into grade-level courses, not modified courses. Best practice and common sense state that assessment should align to curriculum. The new punitive measures for schools exceeding 1% seem completely misguided. Why should schools have to devote tens of thousands of dollars in retraining teachers to properly identify alternate learners when that is not the problem? The problem we have is a growing number of students with unique needs coupled with a flawed algorithm. As both a parent and an educator, I am completely baffled at the logic involved with this policy."*

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*"With the new alternative diploma that has been released, there is a graduation pathway that has been created between a certificate of completion and a general diploma. It seems that an alternative assessment correlates with this new diploma. Parents want this for their students as it is the most appropriate pathway for their students however districts are hesitant to put too many students in this cohort because of the 1% cap. We are forcing students to take a test on curriculum and enduring work that is too difficult. We push off aligning and modifying at the appropriate level for fear that we are putting too many students on the alternative assessment. We do this even when alternative assessment has been clearly identified as most appropriate. Why do we push students through at the elementary and middle school level to stay on an assessment we know ultimately we will take them off at the high school level? We have just wasted years of pushing them through material that is inappropriate and causing them frustration and dislike for learning. This 1% cap is absurd. We need a way to track that a student is performing well below grade level and use that data to support moving to an alternative assessment. Students move, demographics impact some areas more than others, and we have a system that is creating a disservice to students and school corporations. This topic is one of the most frustrating as a special education director. WE NEED TO DO WHAT IS BEST FOR KIDS! 1% is not looking at each individual. Untie our hands and let us do what benefits students. Take a survey of special education staff and parents and you will get an overwhelming response that this needs to be changed. DO BETTER INDIANA."*

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*"I am a teacher of students with cognitive disabilities. I find it troublesome that the state puts a limit on the number of students who can participate in the alternate testing. Public schools accept all children - regardless of disability. How can you put a cap on the number of students with cognitive disabilities who are tested if the school is not able to cap the number of students they accept?? Why is there a 1% limit?"*

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*"I fully believe that case conference committees spend time discussing the pros and cons of a child taking the alternate assessment. Educators, parents and other relevant professionals should be trusted by the state/federal government to make these decisions and not limit to 1%. A child is not a number. It is wrong to force a child to take a test that is too difficult and beyond their capability."*

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*"Please request a waiver extension on the number of students who can be tested using an alternate assessment. Alternative options are necessary for lots of kids. Waiver is crucial."*

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Our community now supports 9 ABA centers. These students often transition into our schools from the centers when they are ready to go to school. That combined with our excellent partnership and program with PRE-ETS, parents chose to send their students with special needs to our schools. We take great pride in providing ALL students the best quality instruction and programming. We ensure only the students with the most significant cognitive needs are given the alternate assessment and diploma, we do not take the decision to move them to an alternate diploma lightly. I am certain there are other schools in the state in the same situation as we are. It should be kids first always, which is why an extension to the 1% cap is absolutely necessary.

As the Corporation Test Coordinator and Title I Coordinator of a small rural school, I have seen a significant increase in the number of students who are and should be using an alternative assessment. One reason for this is the continued improvements in medical care allowing for children who once had significant disabilities that often excluded them from school to now be able to receive medical care that can allow them to attend school. There are other reasons this number has increased; however, educating our students with disabilities is the greatest reason for increased enrollment in students who qualify for alternative assessments.

Whether a student participates in alternate assessment is a case conference committee decision based on specific student data. Placing an arbitrary limit of 1% of a school's population being on that assessment could cause students to take assessments that are not aligned to their abilities. My school serves a 100% special education population, and we exceed the 1% cap each year.

Some years we are able to stay under the 1% cap. Other years, we go over the cap. We have a great program for Life Skills students in our district, and therefore we've had several families move into our district for the educational services we offer. Having so many new students moving into our district causes the number of students taking IAM to sometimes go over the 1% cap.

I AM count should be based upon the school's SE population and NOT on a set percent across the board. 1% is an arbitrary number; our students taking I AM are significantly impact by their disability, enough so that they require intensive support all day in the educational environment. Schools have no control of what students live within district, but we must do everything we can to provide LRE and FAPE.

When we approach the case conference discussion based on current data, there are students who need to have an alternative placement/testing. We do not take this decision lightly. It does take several sessions potentially years of data collection, student observation and large group discussions to make the decision to transition a student from diploma to certificate track. I have been teaching students with intellectual disabilities for 20 years now. The decision isn't any easier now, in most situations it is even harder because our world is SO different. I truly don't believe we should have to fit in a number/quota. Our district does an amazing job of making sure that we are doing what is best for the students. In my career, we have and will continue to be student first. When the student struggles, we provide a variety of supports and continue to collect data to support the need for the alternative assessment/services.

I think the 1% limit should be waived.

I am requesting a waiver of the 1% cap. The 1% is an inaccurate representation of my school.

1% is a totally arbitrary and unrealistic number. It penalizes school districts that do an outstanding job with special needs kids (we have parents who move to our district because of the high quality of our special education services, and this raises our percentage, BECAUSE we do a good job, we are now out of compliance.) Special needs students are not evenly distributed across the state. You are not going to have the same number of students in affluent areas where women receive good prenatal care compared to areas with high poverty and drug addiction rates. I can't think of a single example of anything that is distributed evenly across the state, so why in the world would we think special needs students are?

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For students with severe disabilities or Autism at any level, requiring standardized tests to monitor progress at grade level is unreasonable for several reasons.

First, students in these categories should focus on life skills and gaining independence during their time in school. They need to learn to manage their daily needs, prepare meals/snacks, and shop for groceries, rather than graph lines and plot slopes on a graph. They need to learn to develop relationships to the level that they can and learn to get along with others when things do not go as they had planned. Students need to be given meaningful opportunities to engage in the experiences that will help them the most when looking at the big picture- PAST high school.

Secondly, most students at this level are hands-on learners and function far below their peers. This is why they are identified with severe disabilities. Giving a high school junior an adapted assessment at grade level wastes both teacher and student time when individualized goals focus on writing their name or working on functional math and reading skills. Teachers prioritize the needs of their students ! The skills/concepts that are seen on the state mandated tests are not the skills and concepts that the students work on daily.

Finally, if you have not been in a classroom setting, working day in and day out with students with severe learning disabilities or autism, you should not make recommendations about what is best or most necessary to "monitor" their education. Our school district has a very large population of students with more severe needs from grades K- 12. IF I AM is going to remain a requirement, the percentage cap should be increased because taking administrators and teachers away from classroom to address with the state "why" the numbers were over the "set percentage" is also unproductive. MOST schools and staff will do what is BEST for the students.

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This is an unfair expectation for all schools. Decisions should always be made with the betterment of students in mind and not fearing consequences based on a law that is not attainable for many populations.

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I don't think it is fair that only the students with the most significant cognitive disabilities get to take an alternative test. Just because they don't have the most significant cognitive ability doesn't mean the test is appropriate for them. We have more than 1 percent that need an alternative option. In my opinion as a parent and a paraprofessional in the special needs department this is absolutely absurd.

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As person that works in the special education department I believe that there are more than 1 % of students that need alternative testing. I am also a parent of two special needs children. Both of my children take the alternative testing and have never gotten valuable information back from it. If there is going to alternative testing it needs to cater to the child to test their knowledge so that it can be beneficial to the child and the teachers that are teaching them.

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I find it unsupportive by the DOE to put a 1% cap on districts for alternate testing. We are always over but we are a strong district where parents move to our area for our Essential Skills programming. The students we put on IAM testing CLEARLY meet the criteria and we are always over. Please send someone to audit these kiddos and you will see we are not trying to pull one over on the state.

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I am not sure how you determine that 1% is appropriate to begin with. Where is the data to show detriment to over 1%? I cannot imagine my daughter, who has Down Syndrome, being subjected to taking the SAT and how unfair that would be. Who determined 1% is all that should take the alternate assessment? This is bizarre to me that we are saying no more than 1% of students should take an alternate assessment when there may be over 1% of students that need it in a particular district?

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Please allow the waiver extension for all students who need the help and not just a arbitrary number.

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Capping the percent of students able to take IAM at 1% does not accurately represent our schools or our districts and is not what is best for our students.

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I would like to say that the level of students needs have dramatically increased since 2020. We have seen a steady rise of Students with Disabilities being identified with significant cognitive and neurological impairments. Furthermore with the addition of the requirement of taking the alt assessment for graduation of the alt diploma it has increased the number of students taking the assessment. We previously would have challenged these students by taking the ILEARN especially through those early years but now we are trying to set them up for success later in their academic career.

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In my professional opinion, I believe a waiver extension is definitely warranted due to the noticeable increase of students with significant cognitive disabilities over the last several years. Our local schools have experienced a larger number of students with significant disabilities being found eligible through the evaluation process, along with seeing an increase in move-in students and open enrollment transfers. Our programs designed for students with the most significant cognitive disabilities have drastically increased over the years, resulting in more students needing the alternate state assessment per their learning needs and ability levels. It is very difficult to stay under the 1% cap.

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As a current administrator and previous special education teacher, I would like to request a waiver extension on the number of students who may be tested using an alternate assessment. The data shows that there is a growing number of students with significant learning disabilities, including but not limited to, Autism Spectrum Disorder and Intellectual Disabilities. I would encourage you to visit schools and speak with parents who have students that qualify for the alternative assessment. Thank you for your consideration.

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I feel that a district cannot always meet the 1% cap. There are some years there are more children born with the most significant disabilities in an area. It is out of the school district's ability to affect the number of students who are diagnosed with these disabilities. Also, when a school district does a great job with their special needs students, more parents elect to send their children to that district which in turn affects the number of students with the most significant disabilities that they may have enrolled.

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To whom it may concern,

I am a school psychologist, and I have the pleasure of working with students who have disabilities and helping guide other educators and parents in what we can do to help.

We are very cautious about which students can and cannot complete the typical state assessments, and which ones therefore need to take the IAM assessment instead. We want to make sure that we are setting high expectations for our students in order to encourage their growth. However, we work with many students that are not able to complete or even engage with the standard ILEARN assessments due to the significant impact of their disability(ies).

I understand the need to set a limit on the number of students who can take this assessment. I am an advocate for pushing our students to reach their highest potential. However, the 1% cap is unrealistic to meet, as there are many students who cannot engage with the assessments at all (for example, those with Multiple Disabilities, severe Autism Spectrum Disorders, Intellectual Disabilities, etc.). The choice to determine if a student should be allowed to take an assessment that is more suited to their capabilities should be at the discretion of the student's IEP team, and should not be swayed by potential 'caps.' And they should not need to fear repercussion for making a decision that is in the best interest of a child.

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We know that the state has set a maximum amount of I AM testers at a 1% cap, but I just would like to report that 1% is not even close to a true representation of the actual needs of our students. As a frame of reference, we are generally around 3%.

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The 1% waiver does not realistically represent the special education population and support their needs. The individuals diagnosed with cognitive and physical disabilities represent a larger than 1% population.

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Our corporation offers a continuum of services, including specialized applied skills classrooms for students with moderate to severe disabilities. Parents seeking a supportive and tailored educational environment for their high-needs children often enroll. This does impact our 1% ratio.

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We believe there is a need to ask for the waiver to the 1% cap. We follow the state criteria for determining IAM eligibility for students and consistently have a small percentage above 1% qualify. This is based on student need.

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We are seeing more students with higher acuity and lower cognitive skills returning to public schools.

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IDOE's response was shared directly with the participants in the public comment:

*The Indiana Department of Education (IDOE) appreciates your participation in the public comment period for the 2023-2024 Indiana 1% Waiver Extension Request for the U.S. Department of Education. [Title I of the Elementary and Secondary Education Act of 1965 \(ESEA\)](#) requires that:*

- *Only students with the most significant cognitive disabilities participate in an alternate assessment; and*
- *No more than 1.0% of all students assessed participate in the alternate assessment.*

*For each subject for which assessments are administered, the total number of students assessed in that subject using an alternate assessment may not exceed 1% of the total number of students in the state who are assessed in that subject. Local educational agencies (LEAs) that anticipate exceeding this cap must provide justification and assurances that they will review disproportionality data for students taking the alternate assessment.*

*A case conference committee (CCC) determination based on the [identified participation criteria for I AM](#) and the student's needs is used to determine participation in the general or alternate assessment. CCCs must be informed that the decision to participate in I AM means that the student will have modified exposure to grade-level standards, which could result in a significant impact on academic and post-secondary outcomes.*

*LEAs can calculate alternate assessment participation by dividing the total number of students participating in I AM by the total number of all tested students in the LEA, multiplied by 100. While this can be calculated at the building level for a more comprehensive understanding, IDOE only examines the SEA and LEA participation rates.*

*Technical assistance is available for LEAs to receive support in decision-making and examining both the functional and academic skills of students. LEAs may request technical assistance on IDOE's [website](#).*

## **Appendix B: Indiana Alternate Diploma**

In May 2021, the Indiana State Board of Education approved an amendment for 511 Indiana Administrative Code (IAC) 6-7.1 to establish an alternate diploma and implement corresponding changes to the existing regulatory language in 511 IAC 7.

The alternate diploma is intended for students with the most significant cognitive disabilities for whom a CCC has determined that the alternate diploma is appropriate, as indicated in the student's IEP, and

has taken the alternate assessment. To earn an Indiana alternate diploma, a student must complete the following:

- A minimum of 40 high school credits, applied units, or a combination of high school credits and applied units.
- At least one of the following activities is aligned with the student's transition goals:
  - Complete an industry-recognized certification, a one-year certificate, or a state-approved alternative;
  - Complete a project-based or work-based learning experience as determined by the CCC.
  - Earn a work ethic certificate; or
  - Participate in part-time employment or other work-related activities as determined by the CCC.
- Beginning with cohort 2023 students, develop a transition portfolio that demonstrates the work experience, credentials, or work certificates the student completed during high school.

A comprehensive understanding of the whole student, including a review of educational considerations and data obtained through the IEP process, is required to make this determination. The CCC must agree that the following criteria apply to the student:

- A review of the student's record indicates a disability that significantly impacts intellectual functions and adaptive behavior. Adaptive behavior is defined as essential for someone to live independently and to function safely in daily life.
- The student requires extensive, repeated, individualized direct instruction and substantial support that is not of a temporary nature.
- The student requires substantially adapted materials and individualized methods of accessing information in alternative ways to achieve measurable gains on the state academic content standards for the grade in which the student is enrolled.

More information regarding the alternate diploma can be found [here](#).

## Summary

Indiana is committed to adhering to the one percent participation cap for the alternate assessment, and all associated requirements have been met. IDOE has submitted this waiver request more than 90 days before the next assessment administration.

The certified data provided in this waiver extension request indicates that Indiana is making significant progress toward maintaining the one percent participation cap, with at least 95% of eligible students participating in the assessment.

Public comment has been included to ensure the request aligns with stakeholder needs and interests.

Analysis of participation rates and disproportionality indicated an increase in participation in English Learners and students pursuing the alternate diploma. The state will look into these findings, research best evidence-based practices, and provide strategic, targeted technical assistance to the field to students pursuing the alternate diploma are not inappropriately participating in the alternate

assessment. A toolkit and a crosswalk will be developed to address each area of concern. The toolkit will be shared with the field throughout the following school year to increase understanding of decision-making when a student is moved to I AM to ensure only the most appropriate students are participating.

The state will continue to monitor each LEA's progress closely to identify any other opportunities for technical assistance and ensure compliance with participation and disproportionality policies. This waiver extension request reflects Indiana's substantial progress toward meeting all components of the alternate assessment.