



State Approaches to Monitoring AA-AAAS Participation Decisions

NCEO Report 432



NCEO

National Center on
Educational Outcome:

State Approaches to Monitoring AA-AAAS Participation Decisions

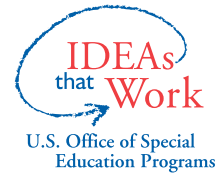
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Executive Summary

Individualized Education Program (IEP) teams determine how students with disabilities will participate in statewide assessments. Most will take the general assessment, with or without accessibility features and accommodations. A small number of students with the most significant cognitive disabilities will take an alternate assessment based on alternate academic achievement standards (AA-AAAS) because they are unable to take the general assessment even with allowable accommodations. It is imperative that only students with the most significant cognitive disabilities participate in the AA-AAAS because it has short- and long-term implications. The instruction of students taking the AA-AAAS may be reduced in depth, breadth, or complexity, and this may have implications for graduation as well as reduce post-secondary options.

This report presents the findings of a survey of states that examined the policies, practices, and procedures State Education Agencies (SEAs) used to monitor IEPs for AA-AAAS participation decision making. For each assessed subject area (i.e., reading/English language arts, mathematics, science), federal law limits the total number of students who are assessed statewide with an AA-AAAS to 1% of the total number of students assessed in the state. This threshold makes it even more important that only students who qualify for the AA-AAAS take the assessment. States that anticipate exceeding the 1% threshold may submit a request for a waiver. This waiver request must contain certain details, including assurances that the state has verified that each Local Education Agency (LEA) the state anticipates will exceed the 1% threshold in any subject is following the State's guidelines for participation in the AA-AAAS. States must monitor and support LEAs to ensure IEP teams are making appropriate AA-AAAS participation decisions.

The survey was sent to the state special education and assessment directors in the 50 regular states and the District of Columbia. Ten of the 34 states that responded to the survey reported that they do not monitor IEPs for AA-AAAS participation decision making. Of the 24 remaining states, 22 completed the entire survey. The two that did not complete the entire survey were not included in the data.

This survey found that a team usually reviews IEPs for AA-AAAS decision making. Most commonly a monitoring team comprised of SEA special education monitoring staff, but assessment specialists also sometimes participate. In most cases, states monitor a select sample of IEPs (not all IEPs). The most common sampling approach was to select which IEPs to monitor based on one or more specific factors identified by the state. When reviewing IEPs, more states reported doing a virtual review than an in-person review; however, it was common for SEAs to conduct both virtual and on-site reviews. Review processes varied across states, but the majority of respondents reported using an ongoing process to implement their reviews and indicated that the state conducted reviews throughout the year. Most IEPs reviewed were in an electronic format that was either submitted by the LEA or in a state online IEP system. However, some states reviewed paper versions of IEPs.

Many states reviewed a student's Multi-Factored Evaluation (MFE)/Evaluation Team Report (ETR), previous test type, or previous test scores. If a state determined that there was insufficient evidence to determine that a student qualified for the AA-AAAS, the state generally worked collaboratively with LEAs to review the decision-making process that was used when the decision was made. Other themes that emerged from the survey were that the process the states used (a) was of an evolving nature, (b) consisted of nuanced differences in the specific ways individual states monitored AA-AAAS participation, (c) had great variation in specific evidence or criteria a state used for monitoring, and (d) included a tiered approach to monitoring IEPs for AA-AAAS decision making, with a focus on LEAs that have been identified as needing the most support.

The primary tool states used when reviewing IEPs for AA-AAAS participation decision making was the state's AA-AAAS participation guidelines, although a checklist was also commonly used. About half the states provided public access to the tool they used.

The policies, practices, and procedures SEAs used to monitor IEPs for AA-AAAS participation decision making varied greatly across states. As with other IEP monitoring practices, reviewing IEPs for AA-AAAS participation is an evolving process, and it is anticipated that states will continue to refine their monitoring processes. States should continue to determine what works best for their specific circumstances and provides the best results, given their available resources. At a minimum, all states should have an established process for monitoring AA-AAAS participation.

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Overview

All students, including students with disabilities, must participate in state academic content assessments. Individualized Education Program (IEP) teams determine how students with disabilities participate in assessments. Most students with disabilities will participate in general assessments, with or without accessibility features and accommodations as appropriate. Accessibility features and accommodations are provided to students with disabilities based on their needs and characteristics so that they have an opportunity to show what they know without impediment of their disability. A small percentage of students with the most significant cognitive disabilities will participate in a state AA-AAAS. Students who take the AA-AAAS are unable to take the general assessment, even with allowable accommodations.

Assessment participation decisions should not be taken lightly. The AA-AAAS has different expectations for performance than the general assessment does. Students who participate in the AA-AAAS receive instruction that may be reduced in depth, breadth, or complexity compared to that of their peers who participate in the general assessment. The nature of instruction and alternate academic achievement standards have implications for a student's future. This could include whether the student gains the knowledge and skills necessary for earning a regular high school diploma, serving in the military, participating in post-secondary training, or securing employment opportunities.

Starting in 2016, federal law limits the total number of students with the most significant cognitive disabilities who are assessed statewide with a reading/English language arts, mathematics, or science AA-AAAS to 1% of the total number of students in the state who are assessed statewide in each of these same subject areas (ESEA section 1111(b)(2)(D)(i)(I)). This 1% threshold raises the importance of ensuring that appropriate students participate in the AA-AAAS, in part because of the additional requirements placed on states and districts when a state exceeds the threshold.

If a state expects to exceed the 1% threshold, it may seek a waiver from the U.S. Department of Education for one year from the requirement to not exceed 1% participation in the AA-AAAS. In order to submit a waiver, a state must provide assurances, one of which that it has verified that each LEA that the state anticipates will assess more than 1% of its assessed students in any subject using an AA-AAAS has followed the State's guidelines for participation in the AA-AAAS (34 CFR §200.6(c)(4)). A state requesting a waiver from the 1% requirement must provide details about what it will do with LEAs expected to exceed the threshold, including:

- Develop a plan for supporting and providing oversight to those LEAs,
- Develop a timeline for providing additional support and oversight to those LEAs, and

- Provide an explanation of how the state will monitor and evaluate the LEAs' training that is designed to ensure that IEP team members understand and implement the state AA-AAAS participation guidelines.

Although it is IEP teams that determine which students participate in the AA-AAAS, the state must monitor and support LEAs to help ensure IEP teams are making appropriate decisions. It is important to know how states are monitoring IEP decision making because ultimately the responsibility resides with the state for ensuring that only students who qualify for participation in the AA-AAAS take the assessment.

The National Center on Educational Outcomes (NCEO) established a 1% Community of Practice (1% CoP) in 2017 at the request of states. States wished to have a forum to discuss and share resources about the Every Student Succeeds Act's (ESSA) 1% threshold on participation in the AA-AAAS. Representatives of 48 states participate in the NCEO 1% CoP. States in the 1% CoP recognized a need to better understand the policies, practices, and procedures SEAs use to monitor IEPs for AA-AAAS decision making after participating in a series of four CoP meetings in early 2021. In response to this need, NCEO created a survey to gather information. This report summarizes the survey findings.

Method

Participants

The monitoring survey of states was sent to state directors of special education and state directors of assessment in the 50 states and the District of Columbia. In several cases, state directors delegated the task of completing the survey to other knowledgeable persons, including state agency AA-AAAS specialists and state agency assessment personnel.

Procedures

Respondents could complete the survey in one of two ways: either through an online survey or by completing a paper version of the survey and returning it via email. One paper survey was returned; all other responses were completed through the online survey. Data collection occurred from March 17 to March 31, 2021.

Materials

The survey included 14 questions. The first question asked whether the responding agency reviewed IEPs for AA-AAAS decision making. Agencies that responded “no” were sent to the end of the survey.

The remaining questions were asked only of those states that indicated they reviewed IEPs for AA-AAAS decisions. First, states were asked (a) who reviews the IEPs (e.g., office of assessment special education specialist), (b) which students’ IEPs were reviewed (e.g., all students with an IEP or a sample of students), (c) where the review took place (e.g., desk review or in person in the LEA), and (d) when the review occurred (e.g., in the spring). The survey also asked about the format of the IEP (e.g. paper or electronic). Next, the survey asked whether reviewers used a tool when reviewing IEPs (e.g., a checklist or rubric), and, if so, whether the tool was publicly available. States were asked to share a link to the tool if their tool was publicly available.

Two questions asked about the type of evidence reviewers look for in the IEP (e.g., parent consent for participation) and whether they review any other documentation (e.g., teacher questionnaire on student’s characteristics). The survey ended by asking what reviewers do if they determine there is insufficient evidence to show a student qualifies for participation in the AA-AAAS. Respondents were also provided an opportunity to share anything else about their process for monitoring IEPs. All survey questions are provided in Appendix A.

Response Rates

A total of 34 states responded to the survey, representing a 67% response rate. Responding states were: Alabama, Arizona, Arkansas, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Maryland, Massachusetts, Michigan, Missouri, Nebraska, Nevada, New Hampshire, New Jersey, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, South Carolina, South Dakota, Tennessee, Utah, Virginia, Washington, Wisconsin, and Wyoming.

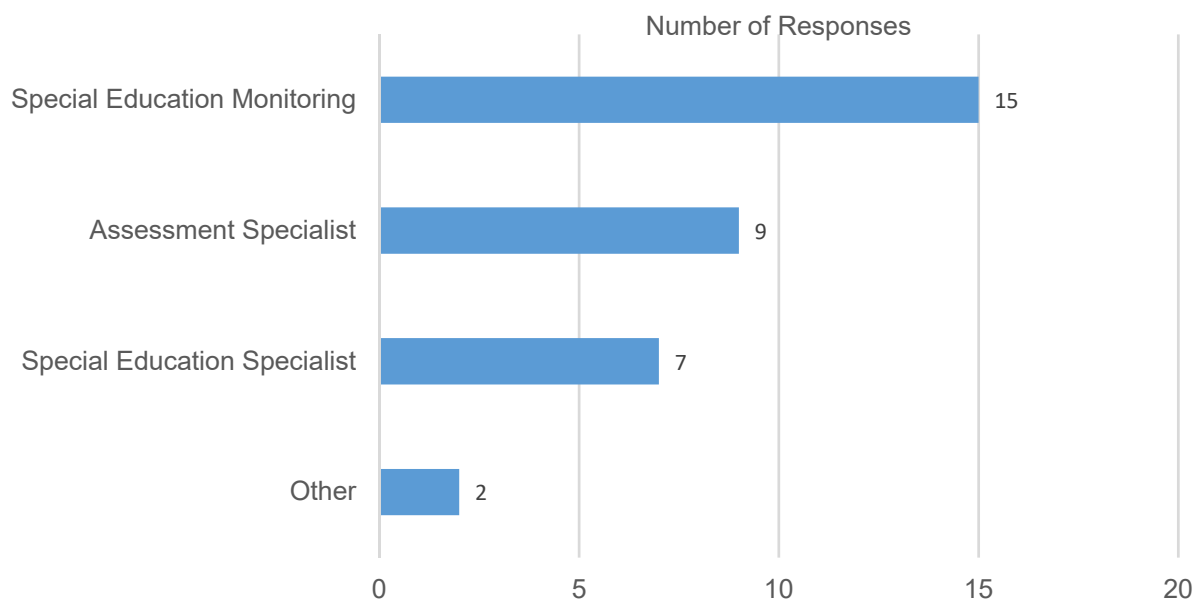
Ten states responded to the first survey question by indicating they do not review IEPs for evidence of AA-AAAS participation decision making. Thus, of the 34 responding states, 71% did conduct some type of review of IEPs. Of the 24 states that responded yes to the first question, one state only responded yes and then submitted the survey without responding to any other questions. Another state responded yes to the first question and then completed the second question before submitting the survey. Twenty-two states completed the entire survey, responding to all questions except the last open-ended question. The open-ended question received 10 responses.

Results

Data presented here represent the status of IEP monitoring practices for AA-AAAS participation decision making in the 22 states for which NCEO had complete data. States typically change and refine their monitoring practices over time (usually at the end of a monitoring cycle), so this report presents a snapshot of monitoring practices. Additionally, some states mentioned in their responses that the process they were currently following had changed due to COVID-19 and that they would again change processes post-COVID-19. Other states mentioned that they reported their present practices in the survey but are in the process of updating them. It is likely that the monitoring methods presented in this report will change over time, given states' ongoing efforts to improve their monitoring practices and the impact of COVID-19.

Figure 1 provides information on who reviewed IEPs for AA-AAAS participation decisions. Office of special education monitoring team members were identified as the most likely to review IEPs for AA-AAAS participation decisions (15 states), office of assessment special education specialists were identified by nine respondents, and office of special education assessment specialists were identified by seven.

Figure 1. Who Reviews IEPs for AA-AAAS Participation Decisions (N=22)



Note: State respondents were able to select multiple responses.

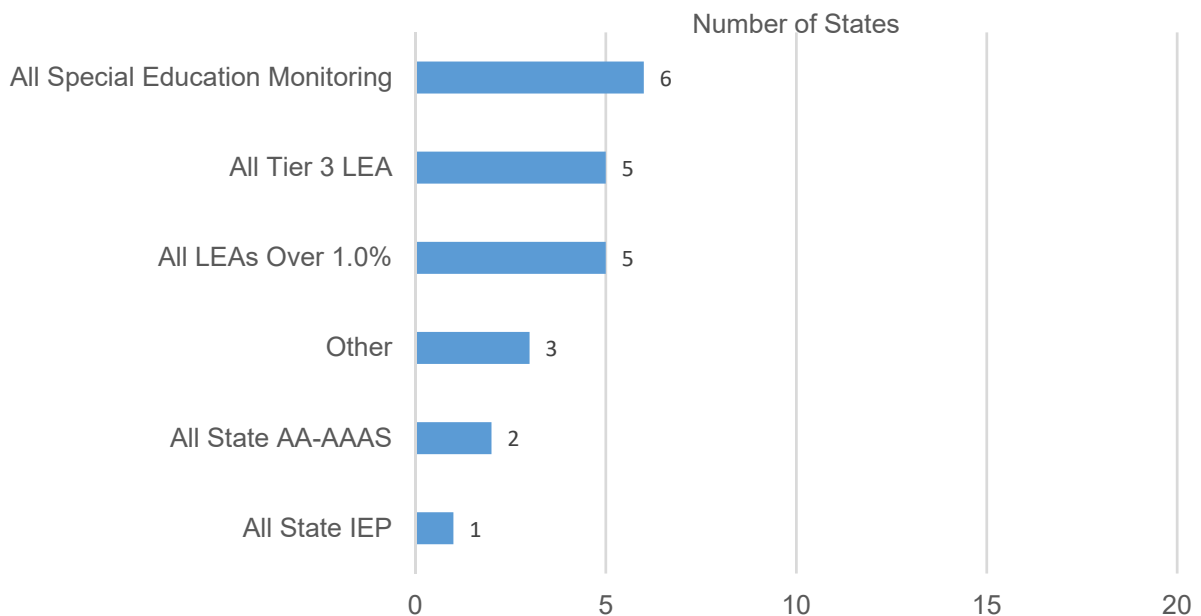
Respondents were asked to mark all options that applied, so, in some states, staff from more than one office collaborate in the monitoring process. The 22 state respondents selected 33 options, indicating the overlap in offices. In the “other” category, one state indicated that the state’s 1%

lead does the monitoring. Another state reported that their office of special education monitoring team members and office of special education instructional services staff both do the monitoring.

States were asked to indicate which group of students with IEPs were monitored when they reviewed for AA-AAAS participation decision making. Figure 2 shows that only one state indicated it monitored the alternate assessment participation decision making for all students with IEPs. Two additional states reported that they monitored the IEPs of all students statewide who have AA-AAAS documented on their IEP.

The most common focus of the review of IEPs was specifically on the IEPs of students who participated in the AA-AAAS in LEAs that were identified due to their high alternate assessment participation rates. Specifically, five states indicated that they monitored the IEPs of students who have AA-AAAS documented on their IEP in LEAs that have an alternate assessment participation rate over 1%. Another five states responded that they monitor students who have AA-AAAS documented on their IEP in LEAs that have been identified as being in “Tier 3” (e.g., falls into the highest or most needy tier of the state’s differentiated tiered framework of technical assistance). Six states monitored students who have AA-AAAS documented on their IEP in LEAs that have been targeted for special education monitoring in general.

Figure 2. Students Targeted for AA-AAAS Participation IEP Monitoring

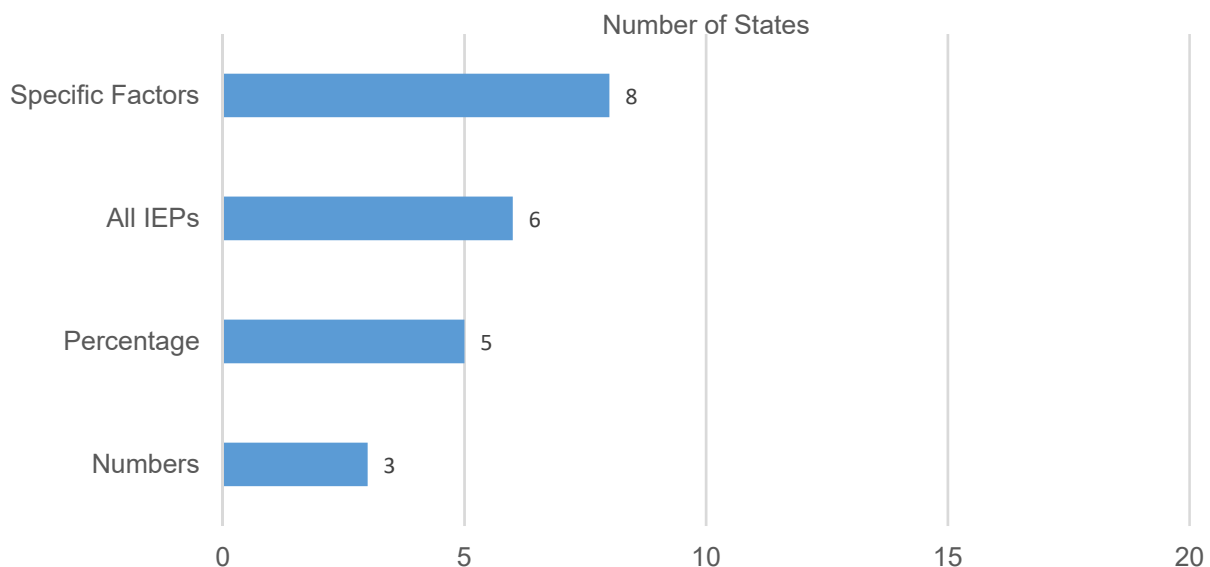


Three states reported “other” for identifying which students with IEPs they review for AA-AAAS participation decision making. One state responded that it monitors students statewide who have “AA-AAAS documented in their IEP x students who have AA-AAAS documents on their IEP in all LEAs over 1% x students who have AA-AAAS documented on their IEP in LEAs that have been targeted for special education monitoring in general.” Another state reported that some AA-AAAS participants’ IEPs are reviewed during general supervision special education monitoring and during targeted monitoring of LEAs with AA-AAAS participation rates over 1%. One state reported it monitors students in districts that consistently exceed the 1% cap in AA-AAAS administration.

States were asked whether they review all or a sample of the IEPs for the group of students whose IEPs were reviewed. Figure 3 shows that six states reviewed all the IEPs in the group while 16 states monitored a sample of the IEPs.

Sampling approaches varied from percentage-based, to numbers-based, to ones that are dependent on other specific factors. For states sampling based on a percentage, two reported they sample 10% of the group. Other percentage responses were 10-20% of the group (one state), 20% of the group (one state), and 3-5% of the district’s total special education enrollment, depending on district size (one state).

Figure 3. Sampling Approaches for AA-AAAS Participation Monitoring



Three states reported a sampling approach based on numbers. The specific responses were:

- A minimum of two IEPs from each identified LEA.

- 2–3 IEPs of AA-AAAS students.
- Approximately 300 IEPs were self-assessed by the targeted 25 districts. From the self-assessments, 63 IEPs were validated by the Bureau of Exceptional Student Education’s program specialists.

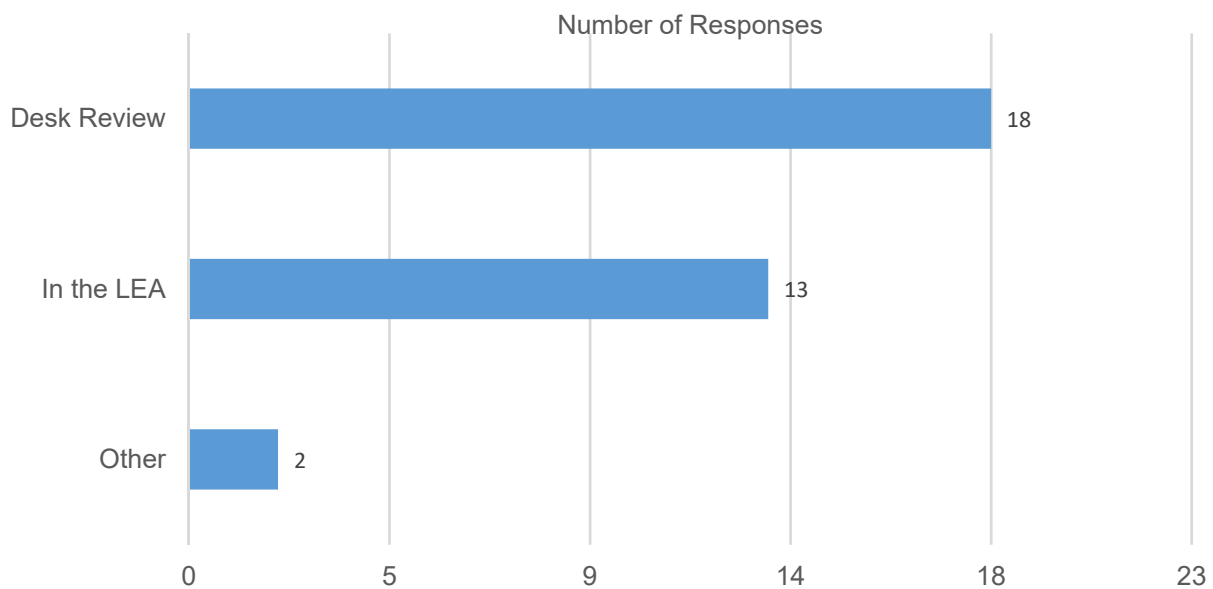
Eight responses indicated that the sampling process was dependent on one or more specific factors. The specific responses were:

- Selected students based on student information sheet data review with the district.
- Some students are chosen based on 1% justifications and others are randomly chosen.
- It depends on the number of students identified and the size of the district.
- Sample specifically looking at disability category and previous score results.
- From a sample of IEPs requested from the LEA, we then review the approximately 1% of the sample of students who are indicated for the alternate assessment.
- The sample is identified by flags (disability category, consistently high scores in alternate assessment, LEAs with a history of not following eligibility criteria).
- Sample size is dependent on the number and type of flags in the LSS (Local School System) or LEA.
 - o LSS/LEA having 1–100 students identified for Alt: 20 file reviews + 5 for any LSS/LEA in Focused/Targeted Tier
 - o LSS/LEA having 101–400 students identified for Alt: 40 file reviews + 10 for any LSS/LEA in Focused/Targeted Tier
 - o LSS/LEA having 401–1,000 students identified for Alt: 60 file reviews + 15 for any LSS/LEA in Focused Tier
 - o LSS/LEA having greater than 1,000 students identified for Alt: 80 file reviews + 20 for any LSS/LEA in Focused Tier Random sampling to include: Elementary, Middle, High School, Private and Public Day Schools
 - o The monitoring team may select additional sampling based on prior findings or areas of concern in support of targeted improvement actions. For LSS/LEA identified for Comprehensive Compliance Monitoring the Alternate Instruction/Assessment Moni-

toring sample includes any identified in the Comprehensive Compliance Monitoring Sample for comparative review.

Figure 4 displays responses to the survey question about where the review of IEPs takes place. Thirteen states responded that they do the review in person in the LEA and 18 states replied they conduct a desk review. Some states selected both LEA review and desk review. Two states selected “other.” One of these states reported it does a virtual review and the other responded it does the review both in person in the LEA and as a desk review.

Figure 4. Location of IEP Review



Note: State respondents were able to select multiple responses.

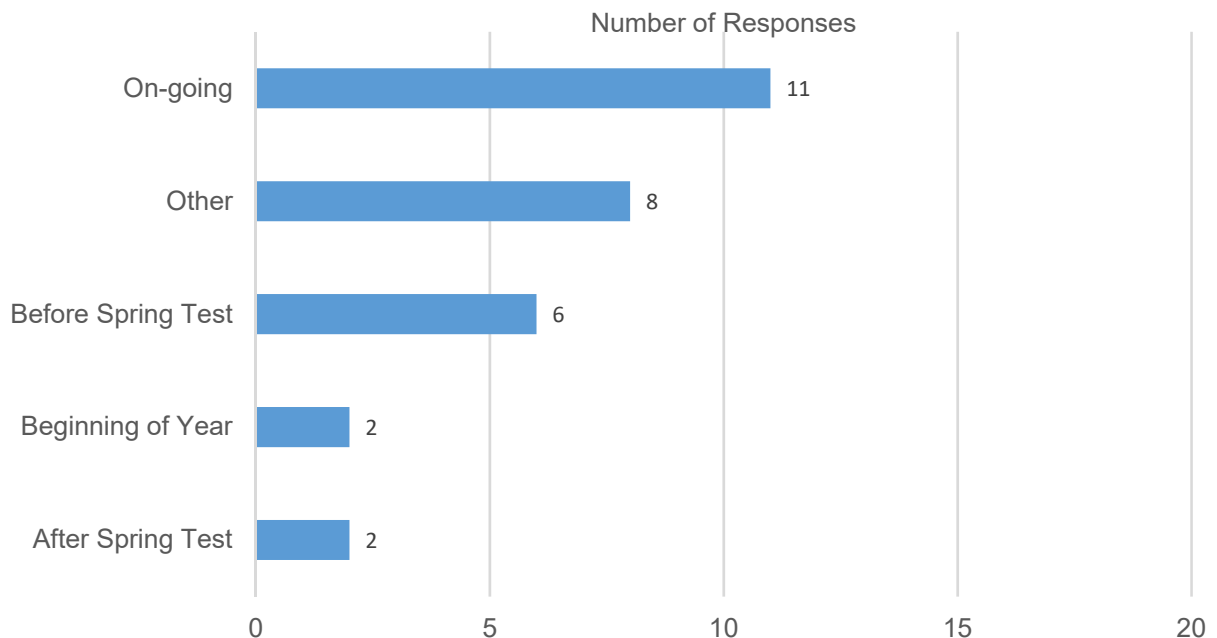
The survey also asked when the review takes place. As seen in Figure 5, 11 states reported that they review IEPs on an on-going basis. Six states reported they review before spring testing. Two states responded that monitoring takes place after spring testing and at the beginning of the school year.

Eight states reported conducting monitoring on a variety of time frames. These responses were:

- From February 18 to April 1.
- In addition to the time selected above, elevated monitoring addresses participation through differentiated timelines as a component of our special education LEA comprehensive monitoring protocol.
- During the school year monitoring cycle.

- In the fall and winter.
- When completing DLM test observations during the fall and/or spring window.
- In the spring for 1% over monitoring and throughout the year during general supervision special education monitoring.
- During the monitoring cycle which is April to September.
- As part of a five-year monitoring cycle.

Figure 5. When Review Takes Place

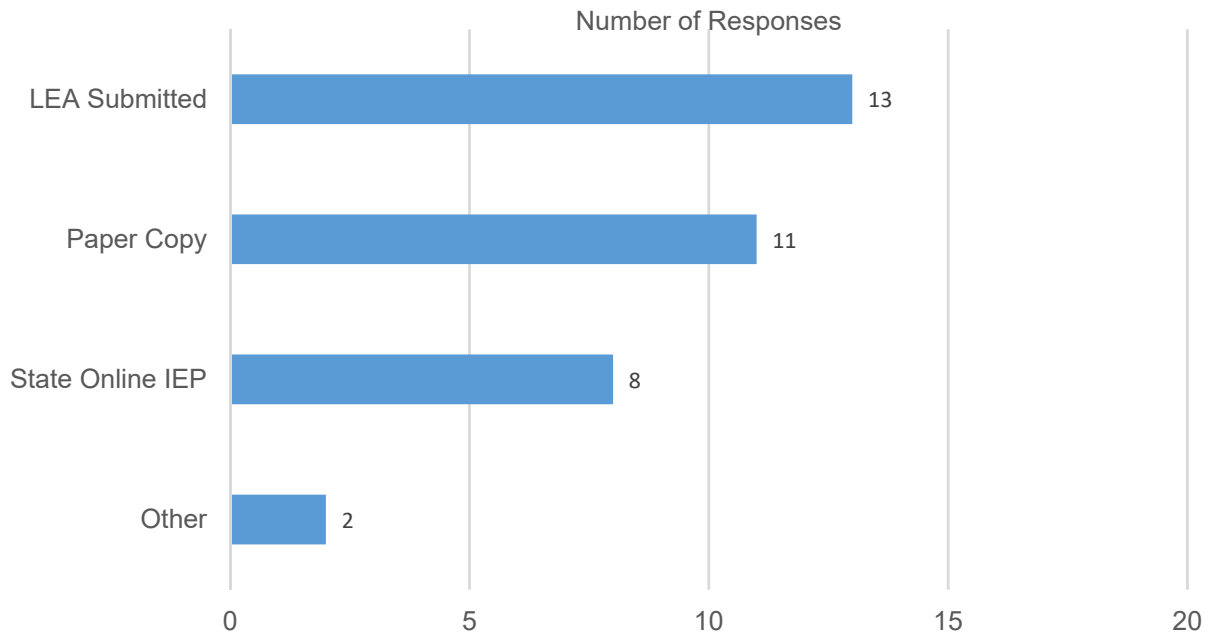


Note: State respondents were able to select multiple responses.

Figure 6 summarizes the states’ responses to a question about the format of reviewed IEPs. Thirteen states responded they review an electronic version submitted by the LEA. Eleven reported they review a paper copy. Eight states responded they use their statewide online IEP system to do reviews. One state reported it does onsite file reviews as needed and one state respondent was unsure.

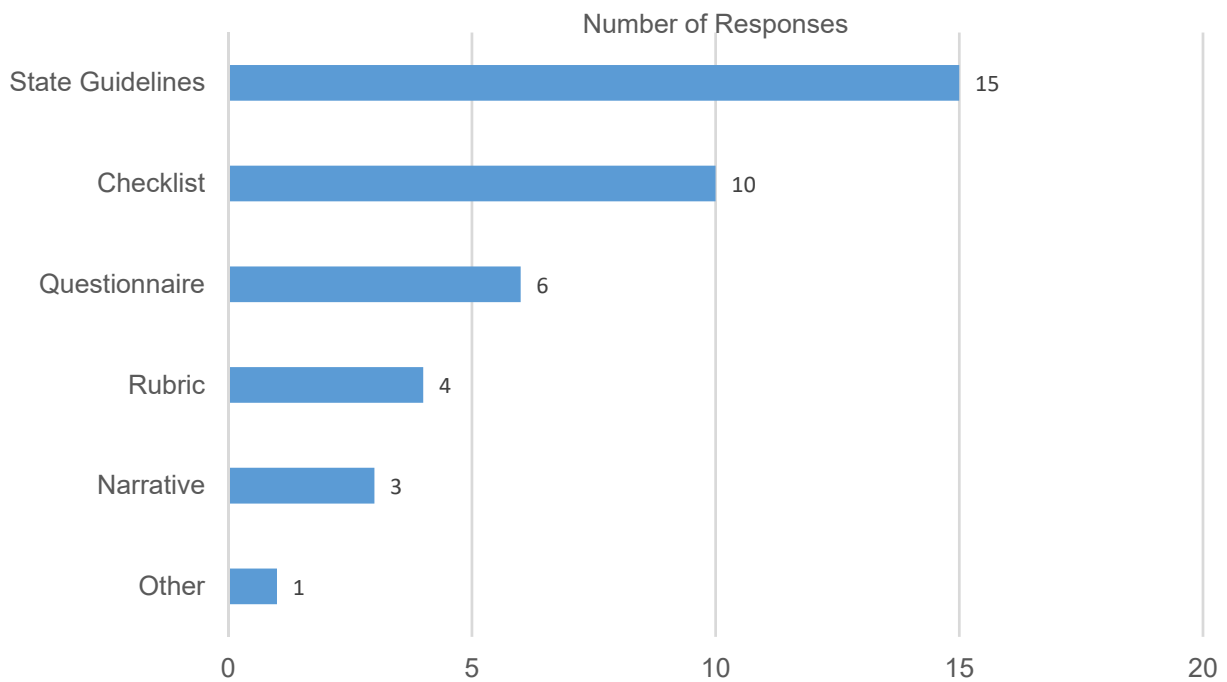
Figure 7 provides information about the types of tools states use when reviewing IEPs for AA-AAAS participation. All responding states reported that they use some type of tool. Fifteen states reported that they use the state’s AA-AAAS participation guidelines. Ten reported using a checklist. Others reported using a questionnaire (six states), rubric (four states), or a narrative review document (three states). One state responded that it uses documentation that the LEA provides.

Figure 6. Format of Reviewed IEPs



Note: State respondents were able to select multiple responses.

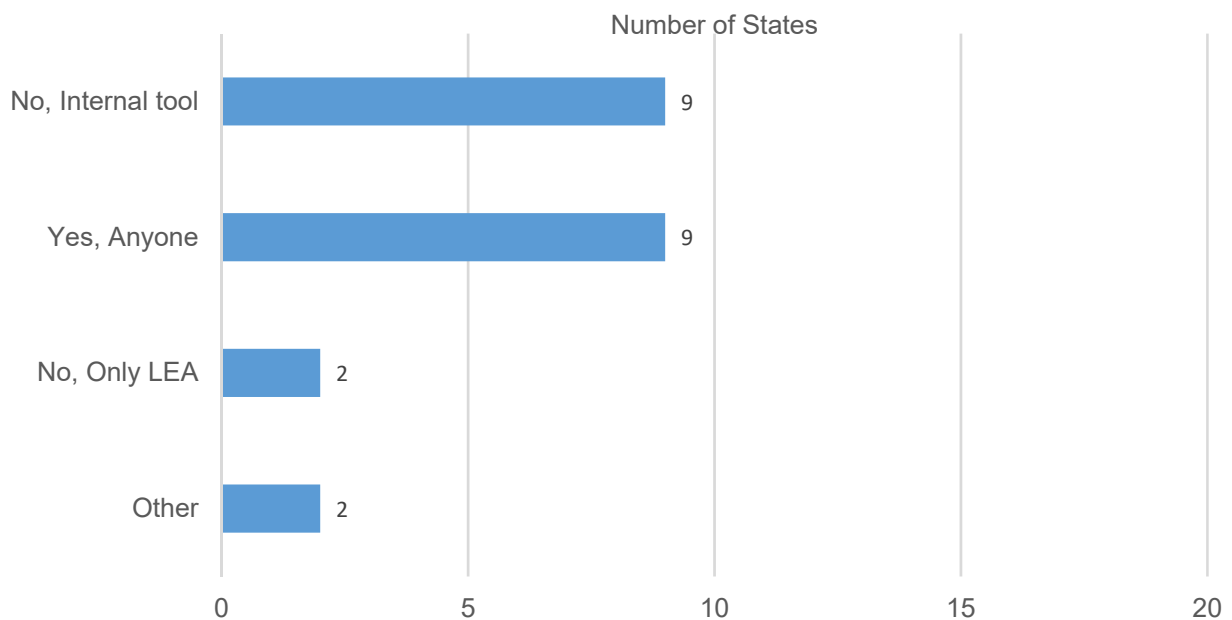
Figure 7. Tools Used to Review IEPs



Note: State respondents were able to select multiple responses.

States indicated whether the tool they use for monitoring IEPs for AA-AAAS participation decision making is publicly available. Results are shown in Figure 8. Nine states replied that anyone can access their tool, and nine states reported it is an internal tool for the reviewers only. Two states responded that only LEAs that are being monitored have access to the tool. One state reported that all LEAs have access to the tool and one state reported that its tool will be publicly available once it is compliant with the Americans with Disabilities Act (ADA). The nine states that said their tool is publicly available provided the link for the tool. These links are provided in Appendix B.

Figure 8. Public Availability of IEP Monitoring Tool



States provided information on the evidence they look for when reviewing an IEP for AA-AAAS participation decision making (see Figure 9). Twenty states reported that they looked for evidence that all elements of the state’s AA-AAAS decision-making criteria were addressed. Sixteen states responded that they look for a checked box stating the student will participate in the AA-AAAS. Fourteen states looked at the student’s present levels of performance. Thirteen states selected the following: (a) review the student’s disability category, (b) review IQ score/ cognitive assessment results, and (c) evidence of significantly modified curriculum.

Eleven states reported that there are two pieces of evidence they review: IEP team member signatures and adaptive behavior scores (summative scores). Eight states identified they review the following: (a) the date that the IEP team made the AA-AAAS participation decision, (b) parent consent for participation, and (c) adaptive behavior scores (all domains). Four states reported they review the student’s reading level. Both of the following were selected by three

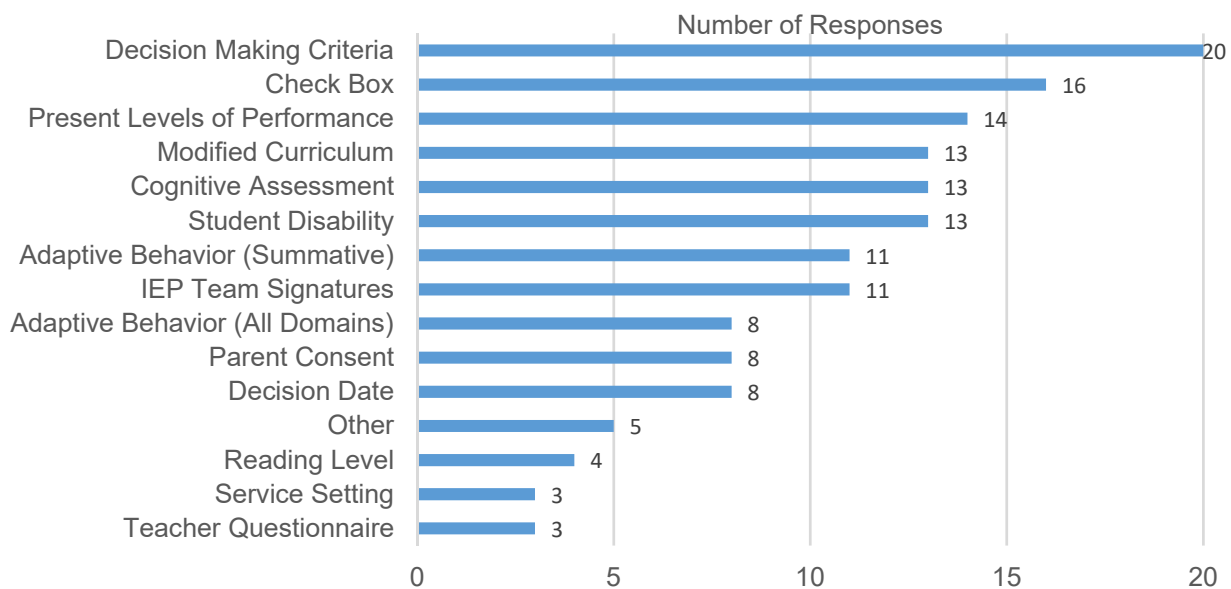
states: teacher questionnaire on student’s characteristics (e.g., Learning Characteristic Inventory [LCI], First Contact Survey, etc.), and setting of service.

Other evidence reported by single states included:

- Accommodations and supports.
- IEP goals and objectives, and IEP team agreement.
- A qualitative monitoring component (i.e., ensuring that annual IEP goals are aligned to alternate academic achievement standards of the child’s enrolled grade level).
- A description of the reason the student cannot participate in the regular assessment and why the AA-AAAS is appropriate.

One state responded that it does not look at additional information.

Figure 9. Evidence States Look for When Reviewing IEPs

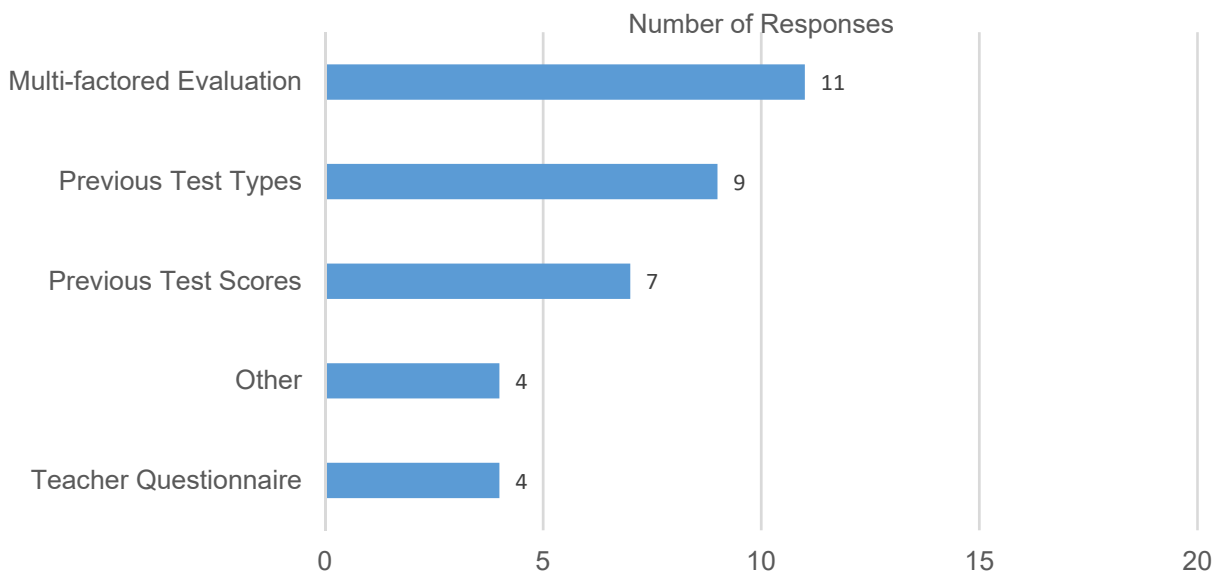


Note: State respondents were able to select multiple responses.

States were asked to report whether they look at any documentation other than the student’s IEP when checking a student’s AA-AAAS participation eligibility. As shown in Figure 10, 11 states reported they also look at the student’s Multi-Factored Evaluation/Evaluation Team Report (MFE/ETR). Nine states reported looking at previous statewide tests in which the student participated (e.g., general or alternate). Seven states responded they look at previous state test

scores. Four states selected teacher questionnaire on student’s characteristics (e.g., LCI, First Contact Survey, etc.). One state reported that if a student’s IEP shows minimal services but the student is taking the AA-AAAS, it triggers additional review of IEP meeting notes and summary of discussion in the IEP meeting summary. Another state noted that it used many of the additional documents reported in Figure 10. Two states responded that they do not look at any additional evidence beyond the student’s IEP.

Figure 10. Documentation States Examine in Addition to Reviewing the IEP



Note: State respondents were able to select multiple responses.

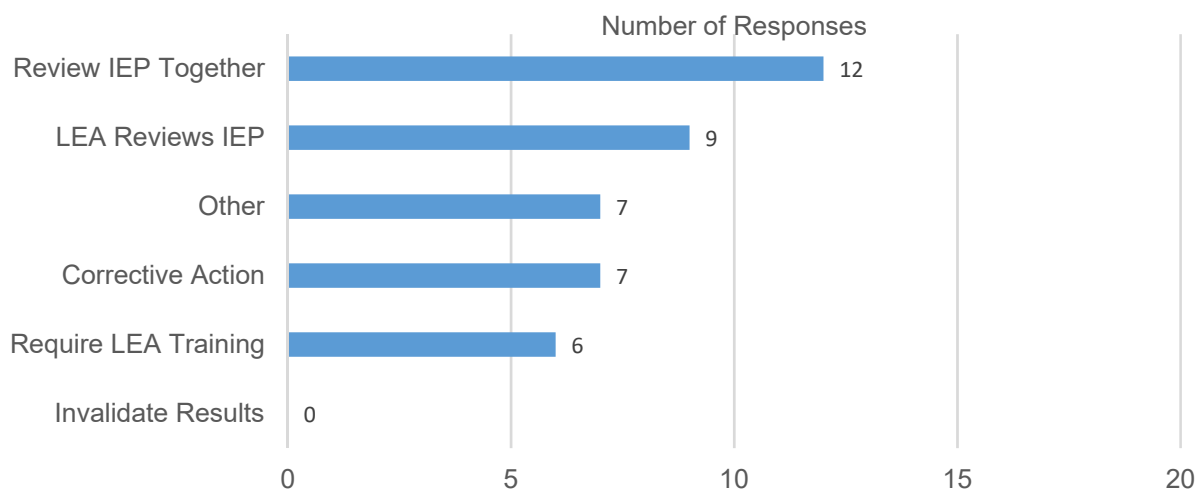
Figure 11 displays state responses to the survey question about what the state does if reviewers determine there is insufficient evidence to show that a student qualifies for participation in the AA-AAAS. The most common response (12 states) was that reviewers meet with the LEA (e.g., case manager, special education director) and review the student’s IEP together. Another nine states reported that they request the LEA (e.g., case manager, special education director) to review the student’s IEP for missing information. Seven states required the LEA to develop and implement a corrective action plan. Six states required the LEA to attend an alternate assessment participation decision-making training session. There were seven other actions that one state each reported:

- Require the IEP team to develop a new IEP.
- Meet with the LEA to provide technical assistance and collaborative support to develop a required improvement plan.
- Require the IEP to be re-done or amended to include the missing information.

- Go over our file review document and leave it with the district.
- Request that the IEP team review the assessment decision.
- Request the LEA review the student’s IEP and make corrections if deemed necessary.
- Provide targeted training and technical assistance.

No state reported that it invalidated the student’s most recent test results (test scores).

Figure 11. Actions Taken When Insufficient Evidence is Provided to Show Student Qualifies for AA-AAAS Participation



A final open-ended question asked whether there was anything else that the state would like to share about the state’s process for monitoring IEPs for AA-AAAS decision making. Four themes emerged from the 10 responses to the question.

One theme referenced the evolving nature of the process states were using to monitor IEPs for AA-AAAS decision making. Two states provided comments on this. One state noted that the process it reported in the survey was prior to COVID-19 protocols and that after COVID-19 protocols were lifted it would revise their procedures again. This state also noted that it was in the process of implementing a statewide online IEP system, which would also impact how it conducts monitoring. Another state indicated that it was in the process of updating its definition of “significant cognitive disabilities” and that once there is a new definition, the state will have to reevaluate the parameters used.

A second theme was that states wanted to provide additional information about their monitoring practices. Two of the three states that provided additional information reported that when they are monitoring for AA-AAAS decision making they only look at one section of the IEP. One

of these states elaborated that when an LEA exceeds the 1% AA-AAAS participation threshold the assessment team joins the on-site programmatic monitoring team to look specifically at the testing section of the IEP. However, another state reported the opposite. In that state the monitoring for AA-AAAS participation decision making is integrated into their system of general supervision monitoring as outlined in the state's special education rules.

A third theme that emerged (three states) was that states had additional information to share about the type of evidence or criteria they look for when monitoring. One state noted that it reviewed the following: (a) course enrollment data, (b) AA-AAAS risk ratio, (c) the current year's AA-AAAS assurances, and (4) whether there were any identified disproportionalities. Another state added that its reviewers looked for big swings in the number of students who are taking the AA-AAAS in an LEA from year to year. The third state reported that one of the risk factors it uses to select LEAs for additional monitoring activities is whether the LEA is over the 1% participation threshold for the AA-AAAS. The state gives points for each risk factor that an LEA has. LEAs over the 1% participation threshold receive additional points which increases the likelihood that it will be selected for further monitoring activities.

Theme four was that some states wanted to elaborate on their differentiated tiered framework of technical assistance for districts that exceeded 1% AA-AAAS participation. Two states reported that districts in the intensive technical assistance tier receive other interventions in addition to having IEPs monitored for AA-AAAS participation decision making. One state wrote that it requires ongoing professional learning on IEP team assessment decision making for LEAs receiving intensive technical assistance. The state also noted that it works with some of these LEAs on implementing inclusive practices. The other state reported that for its intensive technical assistance districts, the state may conduct file reviews when visiting the LEA for test observations. In addition, this state reported it reviews student information sheets in these districts. If the student information sheet data does not support the state AA-AAAS participation criteria, the state will request further files from the district to review.

Discussion

ESSA's 1% threshold on AA-AAAS participation brought a greater emphasis on ensuring that students with disabilities participate in the most appropriate assessment to meet their needs. This prompted states to implement new practices, or refine existing ones, to monitor IEP assessment participation decision making. Through the discussions of NCEO's 1% CoP it became clear that there was a wide range of approaches that states used to monitor IEPs for AA-AAAS participation decision making. The survey described in this report was conducted to gain a better understanding of the different approaches states use to monitor AA-AAAS participation decision making.

The primary finding of the survey was that the practices states use to monitor IEPs for AA-AAAS decision making vary widely. This variability could be due to a state's geographical size, the number of students with disabilities within the state, or the capacity of the state to monitor IEPs for assessment decision making.

The survey results also indicated that not all states monitor IEP team assessment participation decision making even though ESSA requires that any state submitting a 1% threshold waiver or waiver extension request must implement these practices. Ten of the 34 states that responded to the survey reported that they do not monitor IEPs for AA-AAAS participation decision making. According to AA-AAAS participation data for the 2018-2019 school year, three of the 10 states that responded they do not monitor AA-AAAS participation decision making exceeded the 1% threshold in at least one academic content area (Wu et al., 2021).

Findings also revealed that states expect to continue updating their monitoring practices. For example, some states had recently modified practices due to COVID-19 while others were planning to revise their practices.

A scenario of a typical state monitoring process can be developed based on the most common responses to the survey. This scenario shows that monitoring is most often conducted by the regular monitoring team in the special education division. Frequently, that team is joined by an assessment specialist from the special education division or a special education specialist from the assessment division.

Monitors focus on a sample of IEPs within a targeted group. They use LEA-submitted electronic versions of IEPs either throughout the year or during a specified window of time. State participation guidelines, checklists, and questionnaires are used to review IEPs. Monitors confirm that evidence exists (and is acknowledged by the IEP team) supporting the student's participation in the AA-AAAS per the state guidelines. They check to see if a student's present levels of performance and disability categories are identified and often check IEP team signatures. Monitors also review the MFE/ETR and previous student testing data.

Monitors use a constructive (not punitive) approach when they determine there is insufficient evidence for a student to participate in the AA-AAAS. This constructive approach allows monitors to work with LEA personnel to closely examine a student's eligibility to participate in the AA-AAAS. They may also ask the LEA to re-examine the IEP team decision and provide additional evidence, if needed.

Conclusion

Like other IEP monitoring practices, how a state monitors AA-AAAS participation decision making should be an evolving process as the state determines what works best for their specific circumstances and provides the best results given their resources. At a minimum, all states should have some process in place, even those states that are at or below 1% AA-AAAS participation statewide. Both states that do not presently have a process and states that want to refine their process might find it beneficial to look at the practices in other states. Furthermore, as states continue to deal with the effects of COVID-19 and the return to in-person schooling, they may want to reevaluate existing practices. Finally, other factors such as implementation of a new electronic IEP system or changes to a state's AA-AAAS participation criteria might also be reason to reevaluate a state's existing processes.

References

Wu, Y. -C., Lazarus, S. S., & Liu, K. K. (2021). 2018-2019 APR snapshot #25: *State assessment participation and performance of students receiving special education services*. National Center on Educational Outcomes. <https://nceo.info/Resources/publications/APRsnapshot/brief25>

Appendix A

Survey of State Education Agency (SEA) Individualized Education Program (IEP) Monitoring of Alternate Assessment based on Alternate Academic Achievement Standards (AA-AAAS) Participation Decision Making

Please identify your state or territory:

1. Does your State Education Agency (SEA) review IEPs for evidence of AA-AAAS participation decision making?
 - Yes
 - No. (You will be taken to the end of the survey)

2. Who reviews the IEPs for AA-AAAS participation decisions? (Mark all that apply):
 - Office of assessment special education specialist(s)
 - Office of special education assessment specialist(s)
 - Office of special education monitoring team member(s)
 - Other: _____

3. Which group of students with IEPs do you review for AA-AAAS participation decision-making?
 - Students statewide who have an IEP
 - Students statewide who have AA-AAAS documented on their IEP
 - Students who have AA-AAAS documented on their IEP in all Local Education Agencies (LEA) over 1.0%
 - Students who have AA-AAAS documented on their IEP in LEAs that have been identified as “Tier 3” or that the state considers the most in need of support for AA-AAAS participation
 - Students who have AA-AAAS documented on their IEP in LEAs that have been targeted for special education monitoring in general
 - Other: _____

4. For the group identified in question 3, do you review all IEPs or a sample?
 - All IEPs in the group
 - A sample of IEPs in the group. If a sample, define the sample in the box below (e.g., 2 IEPs, 10% of IEPs): _____

5. Where do you do the review? (Mark all that apply):
 - In the LEA
 - Desk review
 - Other: _____

6. When do you do the review? (Mark all that apply):

- In the spring, before spring testing
- After spring testing
- At the beginning of the school year
- On an on-going basis
- Other: _____

7. In what format do you review the IEP? (Mark all that apply):

- Paper copy
- Electronic version submitted by the LEA
- Statewide online IEP system
- Other: _____

8. What type of tool do you use when reviewing IEPs for AA-AAAS participation? (Mark all that apply):

- We do not use a tool (This option will skip to item 11)
- Narrative review document
- Checklist
- Rubric
- Questionnaire
- The state's AA-AAAS participation guidelines
- Other: _____

9. For the tool in question 8, is it publicly available?

- Yes, anyone can access it
- No, only LEAs that we are monitoring have access (This option will skip to item 11)
- No, it is an internal tool for the reviewers only (This option will skip to item 11)
- Other (This option will skip to item 11): _____

10. For the publicly available tool from question 8 please insert the link here: _____

11. When reviewing an IEP for AA-AAAS participation decision making, evidence we look for is (Mark all that apply):

- The date that the IEP team made the AA-AAAS participation decision
- IEP team member signatures
- Parent consent for participation
- Checked box stating student will participate in the AA-AAAS
- Student's disability category
- IQ score / Cognitive assessment results
- Adaptive behavior scores (all domains)

- Adaptive behavior scores (summative score)
- Teacher questionnaire on student's characteristics (e.g., Learning Characteristic Inventory [LCI], First Contact Survey, etc.)
- All elements of the State's AA-AAAS decision-making criteria
- Setting of service
- Evidence of significantly modified curriculum
- Present levels of performance
- Reading level
- Other: _____

12. In addition to reviewing the IEP, when checking a student's AA-AAAS participation eligibility, we also look at (Mark all that apply):

- Teacher questionnaire on student's characteristics (e.g., Learning Characteristic Inventory [LCI], First Contact Survey, etc.)
- Previous statewide test types (i.e., general or alternate)
- Previous state test scores
- Multi-Factored Evaluation (MFE)/Evaluation Team Report (ETR)
- Other: _____

13. After reviewing the IEP, if the reviewers determine there is insufficient evidence to show the student qualifies for participation in the AA-AAAS, we (Mark all that apply):

- Request the LEA (e.g., case manager, special education director, etc.) to review the student's IEP for missing information
- Meet with the LEA (e.g., case manager, special education director, etc.) and review the student's IEP together
- Invalidate the student's most recent test results (test scores)
- Require the LEA to attend an alternate assessment participation decision-making training
- Require the LEA to do a corrective action plan
- Other: _____

14. Is there anything else about your process for monitoring IEPs for AA-AAAS participation decision making you would like to share?

Appendix B

Publicly Available AA-AAAS Participation Monitoring Tools

Arizona

<https://www.azed.gov/sites/default/files/2020/10/Alternate%20Assessment%20Eligibility-Rev%20July%202021.pdf>

Delaware

<https://www.doe.k12.de.us/cms/lib/DE01922744/Centricity/Domain/527/Alternate%20Assessment%20Compliance%20Monitoring%20Rubric.pdf>

Florida

<http://www.fldoe.org/core/fileparse.php/7673/urlt/AA-AAAS-ISSA-2020LEAGuide.pdf>

Indiana

<https://www.doe.in.gov/sites/default/files/assessment/indiana-participation-guidance-updated-091219.pdf>

Nebraska

<https://cdn.education.ne.gov/wp-content/uploads/2019/08/Alternate-Assessment-Criteria-2019.pdf>

Ohio

http://education.ohio.gov/getattachment/Topics/Testing/Ohios-Alternate-Assessment-for-Students-with-Sign/AASCDDecisionmakingTool_Final_Accessible-pdf.aspx.pdf.aspx?lang=en-US

South Carolina

<https://sc-alt.portal.cambiumast.com/resources/overview-, -a-, amp; -faqs/participation-guidance-for-iep-teams>

South Dakota

<https://doe.sd.gov/assessment/alternate.aspx>

Washington

<https://www.k12.wa.us/sites/default/files/public/specialed/pubdocs/iepreviewform.docx>

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