



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

March 3, 2026

The Honorable Glenn Maleyko
State Superintendent
Michigan Department of Education
608 W. Allegan Street, P.O. Box 30008
Lansing, MI 48909

Dear Superintendent Maleyko:

I am writing in response to the Michigan Department of Education's (MDE's) request on January 2, 2026, for a waiver of section 1111(b)(2)(D)(i)(I) of the Elementary and Secondary Education Act of 1965 (ESEA), which stipulates that a State may not assess more than 1.0 percent of all students in the grades assessed using an alternate assessment aligned with alternate academic achievement standards (AA-AAAS). Michigan requested this waiver because, based on State data for school year (SY) 2024-2025, MDE concluded that it may exceed the 1.0 percent cap on AA-AAAS participation in reading/language arts (R/LA), mathematics, and science.

After reviewing MDE's waiver request, I am granting, pursuant to my authority under section 8401(b) of the ESEA, for SY 2025-2026, a one-year waiver of section 1111(b)(2)(D)(i)(I) of the ESEA so that Michigan may assess with an AA-AAAS more than 1.0 percent of the total number of students in the State who are assessed in R/LA and mathematics.

However, I am declining to exercise my authority under section 8401(b) of the ESEA, for the 2025-2026 school year, a one-year waiver of section 1111(b)(2)(D)(i)(I) of the ESEA in science. I am declining the request for science because MDE did not meet the 95 percent assessment participation requirement in 34 CFR § 200.6(c)(4)(ii) in science for students with disabilities during the 2024-2025 school year.

If the data reported by MDE are erroneous and the State can demonstrate that it has assessed at least 95 percent of students with disabilities in science during the 2024-2025 school year, MDE may revise its waiver request, consistent with section 8401(b)(4)(B)(ii) of the ESEA, to meet the requirements under 8401(b)(1)(C) and (F) and 34 CFR § 200.6(c)(4)(ii). The revised science waiver request must be submitted no later than 60 days from the date of this letter.

As part of this waiver in R/LA and mathematics, MDE assured that it:

- Will continue to meet all other requirements of section 1111 of the ESEA and implement regulations with respect to all State-determined academic standards and assessments, including reporting student achievement and school performance, disaggregated by subgroups, to parents and the public.
- Had assessed in SY 2024-2025 at least 95 percent of all students and all students with disabilities who are enrolled in grades for which the R/LA and mathematics assessments are required.

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

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

- Will require that a local educational agency (LEA) submit information justifying the need of the LEA to assess more than 1.0 percent of its assessed students in any such subject with an AA-AAAS.
- Will provide appropriate oversight of an LEA that is required to submit such information to the State.
- Will verify that each LEA that is required to submit such information to the State is following all State guidelines in 34 CFR § 200.6(d) – excluding (d)(6) and will address any subgroup disproportionality in the percentage of students taking an AA-AAAS.
- Will implement, consistent with the plan submitted in MDE’s waiver request, system improvements and will monitor future administrations of the AA-AAAS to avoid exceeding the 1.0 percent cap.

In recognition of the State’s progress, the Department is amending the existing grant condition on MDE’s Title I, Part A grant award regarding AA-AAAS participation. MDE is no longer required to participate in regular, joint monitoring calls with the Department’s Office of Elementary and Secondary Education and Office of Special Education Programs. However, because MDE’s participation rates remain well above the 1.0 percent cap, the current Title I, Part A grant condition for non-compliance with section 1111(b)(2)(D)(i)(I) of the ESEA remain in place. To remove the condition MDE must:

- By 60 days from the date of this letter, submit an updated plan for reducing the rate of AA-AAAS participation in future years to comply with the 1.0 percent requirement. This plan should include information on the State’s progress on the previously submitted plan. Please submit this plan by email to the Department at ESEA.Assessment@ed.gov.
- Submit evidence that the plan and timeline are made publicly available on the State’s website when the plan is provided to the Department.
- Demonstrate substantial progress in reducing the percentage of students tested on the alternate assessments in the 2025-2026 school year as validated by the State *EDFacts* assessment participation data submission.

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

I appreciate your work to improve Michigan’s schools and provide a high-quality education for your students. If you have any questions, please contact my staff at ESEA.Assessment@ed.gov.

Sincerely,

/s/

Kirsten Baesler
Assistant Secretary
Office of Elementary & Secondary Education

cc: Andrew Middlestead, MDE Director, Office of Educational Assessment and Accountability



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

GRETCHEN WHITMER
GOVERNOR

GLENN M. MALEYKO, Ph.D.
STATE SUPERINTENDENT

January 5, 2026

Office of Elementary and Secondary Education Assessment Team
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202
ESEA.Assessment@ed.gov

Dear Office of Elementary and Secondary Education Assessment Team,

The federal Every Student Succeeds Act (ESSA) caps the percentage of students who can take the alternate assessment at 1% of the total students tested. The ESSA also allows states that may exceed the 1% cap to apply for a one-year waiver. This document serves as the formal request of the Michigan Department of Education (MDE) for a waiver approval through spring 2026. The waiver approval will allow MDE and local education agencies (LEAs) to continue ensuring appropriate assessment selection for students with disabilities and further reduce participation numbers for Michigan's alternate assessment to meet the 1% cap requirement.

ESSA 1% Cap on Alternate Assessment Use Waiver History

Michigan applied for and was granted the initial waiver on May 14, 2018. In 2019, 2021, and 2022, MDE applied for and was granted an extension to the initial waiver by the U.S. Department of Education (USED). Michigan's 2020 waiver request was rescinded when USED waived assessment requirements due to the COVID-19 pandemic and subsequent school closures. In 2023, 2024, and 2025, Michigan applied for a waiver, but these waivers were denied due to Michigan not making adequate progress in reducing the rate of alternate assessments and/or not meeting the requirements to test 95% or more of all students and 95% or more of students with disabilities. Additionally, the waiver denial received on March 13, 2024, placed a condition on Michigan's Title 1, Part A funds. This condition was escalated to a high-risk status on April 8, 2025, requiring that Michigan participate in joint monitoring calls with USED, including the federal offices of Elementary and Secondary Education and Special Education Programs. As part of the initial condition requirements placed on Title 1, Part A funds, Michigan developed a plan to comply with the 1% alternate assessment cap required by ESSA. This plan was provided to Assistant Secretary Adam Schott of the Office of Elementary and Secondary Education on May 10, 2024, and is publicly available on MDE's website at [Michigan Compliance Plan for Reducing Over Use of Alternate Assessments](#).

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Michigan implemented this plan during the 2024-25 academic year and is continuing the work and making progress in reducing the alternate assessment rate. In spring 2025, for the first time in three years, Michigan reduced its alternate assessment rate from 1.8% in all subjects to 1.6% in mathematics and science, and to 1.5% in English language arts (ELA). This represents approximately 1,400 more students with disabilities who have moved to higher instructional standards for their education and assessment of their learning.

While these two-tenths and three-tenths reductions represent meaningful progress at reducing the alternate assessment rate in Michigan and are likely to contribute to meaningful educational benefits for these 1,400 students as they progress through the education system, MDE still anticipates exceeding the 1% cap in 2026. This new waiver request includes the actions delineated in the compliance plan submitted to USED in May 2024, with updates on implementation progress, as well as new, enhanced, and continuing activities planned for the 2025-26 academic year.

A review of our data, participation rates, and student demographics suggests that reducing our alternate assessment rate further will require discerning students with milder intellectual impairments from those with more significant intellectual impairments. Furthermore, students with disabilities in grades 4-8 who begin working toward general grade-level standards for instruction are 20% more likely to earn a high school diploma and 10% more likely to enroll in post-secondary coursework compared to their otherwise similar peers who continue to work towards alternate content standards for instruction and assessment (Cullum & Trevino, 2021). Historically, Michigan's reductions in alternate standards rates have come from students with higher incidence/milder disabilities receiving more appropriate assessment and greater access to general grade-level instruction. To continue to make further gains, Michigan is providing increased monitoring and evaluation of the separate criteria needed to determine that a student has the most significant cognitive disability. Michigan is also clarifying primary instructional standards and a student's level of needed support for demonstrating learning and generalizing across settings.

Following guidelines from the American Association for Intellectual and Developmental Disabilities (AAIDD) and the American Psychiatric Association (APA), as well as considering high-leverage practices identified in most other states, the necessary four criteria are:

- Substantial impairment to cognitive functioning,
- Substantial impairment to adaptive functioning across the conceptual, social, and practical domains of life,
- Extensive support needs, and
- Majority of instruction/goals rooted in alternate achievement standards.

Building on these improved and clarified criteria for appropriate use of alternate standards-based assessments, Michigan is engaging in the following new, enhanced, or continued activities:

New Activities

Beginning in fall 2025, Michigan engaged in the following new activities to address the overuse of alternate assessments:

- Require all districts with alternate assessment rates of 2% or more to attend a training with MDE regarding the criteria needed for a student to qualify for alternate standards-based assessments. MDE will create the agendas and facilitate the meetings, which will be offered several times throughout the 2025-26 academic year.
- In partnership with Michigan's Center for Educational Performance and Information (CEPI), Michigan will add a new code in the Michigan Student Information System (MSDS) to allow districts to report which students meet criteria for having the most significant cognitive disabilities and begin collecting this information in the fall of 2025. The MSDS collection manual and guidance documents list the four criteria necessary for a student to meet this definition.
- Develop an assessment monitoring activity to systematically evaluate the efficacy of MDE's initiatives, thereby informing data-driven decisions regarding the continuation, enhancement, or introduction of targeted activities.
- Begin to phase in alternate assessment exclusionary criteria over the next 2 years, requiring extra scrutiny of students assigned to alternate assessments when their type of disability is not compatible with a student having the most significant cognitive disability. This would include such disability types as Specific Learning Disability, Speech and Language Impairment, and Emotional Impairment. In applying these exclusionary criteria, Michigan is following best practices used in other states, such as Ohio and Utah. If school districts wanted to register students with these types of disability categories for the alternate assessment, they would need to demonstrate using criterion-relevant data that reveal the student does, in fact, meet all the requirements for alternate assessments. For the 2026 testing cycle, these disability categories will continue to trigger warning messages during the test registration period, and an email response message from MDE to the district staff regarding such inappropriate cases. Additionally, registering a student with one of the prohibiting types of disabilities will begin to trigger warnings in the state student information system, when the new code for most significant cognitive disability is used inappropriately.

Enhanced Activities

Michigan is doing the following during the 2025-26 school year:

- Refine the range of tiers used to determine which districts require the most support. Districts receiving Tier 3 directed support will now include all districts

with alternate assessment rates of 2% or more (a change from 2.5 %); and districts receiving targeted support (i.e., Tier 2 districts) will now include all districts with alternate assessment rates of 1.3% to 1.9% (a change from 1.3% to 2.4%).

- Release lists of flagged student cases based on the spring 2025 testing cycle to districts and intermediate school districts (ISD) one month earlier than last year (October vs. November), allowing districts with high alternate assessment participation rates to take timely action during the current academic year, rather than the following academic year.
- Gather representative special education stakeholder feedback beginning in fall 2025 — including parents, teachers, education administrators, advocates, and advisory groups — regarding our alternate assessment system to identify if and what modifications or innovative practices may be warranted to make the assessment more relevant to today's students.
- Revise the interactive decision-making tool and look for ways to incorporate criterion-relevant data and accurately interpret it to determine if each of the four criteria is met.
- Improve the action plan sections of the online justification forms, allowing districts with high rates of alternate assessment participation the ability to more easily organize their monitoring and evaluation activities around each of the four necessary criteria a student must meet to qualify for alternate assessments.
- Change ISD determinations issued by the MDE Office of Special Education to better emphasize the importance of 95% or more participation rates among students with disabilities in some statewide, end of year assessments, either regular or alternate assessment.
- Update MDE's decision-making flow chart resource, entitled, [Should My Student Take the Alternate Assessment](#), to explicitly state the exclusionary types of disabilities (Specific Learning Disability, Speech Impairment, Emotional Impairment). The flowchart now also links to the [Rubric for Assigning Students to Alternate Standards for instruction and assessment](#), to offer more in-depth guidance when needed.

Continuing Activities

Michigan will continue the following during the 2025-26 school year:

- Convene an internal cross-office and ongoing action planning team and a guiding team consisting of senior leadership and including leadership from both the Office of Special Education and the Office of Educational Assessments and Accountability to develop, implement, and monitor the publicly listed planned activities to bring Michigan into compliance with the alternate assessment requirements with support from multiple and relevant offices within MDE. These teams continue to facilitate and monitor the work surrounding alternate assessment participation and maintain its priority status within the department.

- Continue a multi-tiered system of support, with universal, targeted, and directed feedback and activities within the justification form review and feedback process for districts that assign more than 1% of their students to alternate assessments based on alternate achievement standards.
- Provide targeted technical assistance to districts on increasing access to the general education curriculum and instruction for students transitioning from the alternate assessment. Michigan estimates that at least 6,800 enrolled students currently working toward alternate standards will benefit from this technical assistance.
- Provide test preregistration warnings to LEAs in the MDE Secure Site when student cases may not meet one or more of the required criteria to qualify for an alternate assessment. To ensure proper identification of students taking the alternate assessment, MDE staff will contact, via individual phone calls and emails, the 10 local school districts identified during the pre-registration process with the most warnings for inappropriate assignment of students to take the alternate assessments.
- Provide targeted and directed feedback to ISDs and districts that submitted flagged student case review summaries, which explains whether each eligibility criterion for alternate assessments was met or not met.
- Continue collecting justification forms, as required in ESSA, in the Michigan Special Education Catamaran system for each district that assigns more than 1% of students to be assessed based on alternate standards. Constant contact messages will also continue to be sent to districts and ISD on a quarterly basis to serve as reminders of expectations and requirements related to the alternate assessment participation rates. Justification forms were updated June 2025 to be more effective.

2026 MDE Plan for Reducing High Rates of Alternate Assessment Use

As with past waiver plans, Michigan will once again implement a tiered system of support based on the rates of alternate assessment use overall and relative risk ratios for subgroups of students within a district that points out when a historically underserved group of students is assigned to alternate standards at a much higher rate than other students. To reach more districts and further reduce Michigan's alternate assessment rates, the threshold for Tiers 2 and 3 was reduced by five tenths of a percent compared to the previous academic year. For the 2026 testing cycle, the tiers will be based on the following criteria:

Tier 1: Districts with alternate assessment rates of 1.1% to 1.2% and with no subgroup of students that is 2.5 or more times more likely to be assigned to alternate assessments than other students for 2 of the last 3 years. These districts will receive basic and universal support.

Tier 2: Districts with alternate assessment rates of 1.3% to 1.9% or with a subgroup of students that is 2.5 or more times more likely to be assigned to alternate

assessments than other students for 2 of the last 3 years and an overall alternate assessment rate of less than 1.3%. These districts will receive targeted support.

Tier 3: Districts with alternate assessment rates of 2.0% or more or with a subgroup of students that is 2.5 or more times more likely to be assigned to alternate assessments than other students for 2 of the last 3 years and an overall alternate assessment rate of 1.3% to 1.9%. These districts will receive directed support.

Targeted Activities for Districts in Each Tier

Tier 1 support will include universal guidance around the appropriate use of alternate standards for instruction and assessments and the decision-making flowchart as a resource. Additionally, the MDE rubric for interpreting data around each of the 4 required criteria for alternate assessments, along with a guidance video, will be available for these districts.

Tier 2 districts must complete an action plan. This will include:

- Training for all relevant staff around the four criteria necessary for the appropriate use of alternate standards and assessments.
- Providing parental notification about the implications that working towards alternate content expectations and taking alternate assessments have on the student's ability to make progress toward a high school diploma.
- Reviewing all their flagged students with the rubric using criterion-relevant data.
- Summarizing the above data on the High-Risk Summary Form for each flagged student record and submitting it in Catamaran. The High-Risk Summary will be shared with the local ISD who will provide targeted feedback.
- Summarizing student educational benefit reviews conducted by IEP Teams for students who continue to meet all four required criteria for the use of alternate assessments but are also surpassing the alternate educational standards to which they are assigned.
- Monitoring of actions taken by Tier 2 districts will be done primarily by the ISD, using universal and targeted guidance resources provided by MDE.

Tier 3 districts must complete an action plan. This will include:

- Training led by MDE around the four necessary criteria for the appropriate use of alternate standards and assessments. Districts in this tier must have relevant staff and leadership attend a required meeting, led by MDE staff, focusing on appropriately identifying students who meet the definition of the most significant cognitive disability.
- Providing parental notification about the implications that working towards alternate content expectations and taking alternate assessments have on the student's ability to make progress toward a high school diploma.

- Reviewing all their flagged students with the rubric using criterion-relevant data.
- Summarizing the above data on the High-Risk Summary Form for each flagged student record and submitting it in Catamaran. MDE will provide directed feedback on all flagged student cases. The districts must verify that the students meet all four required criteria for eligibility for alternate assessment participation, or take corrective action, re-assigning the student to the appropriate assessment, when any of the required criteria are not met.
- Summarizing student educational benefit reviews conducted by IEP Teams for students who continue to meet all four required criteria for the use of alternate assessments but are also surpassing the alternate educational standards to which they are assigned.

Monitoring of actions taken by Tier 3 districts, primarily by MDE, using universal and targeted guidance resources and directed feedback provided by MDE.

Additionally, Tier 2 and Tier 3 districts flagged with disproportionately high rates of alternate assessment assignment for a historically underserved group of students must review the students in the subgroup of the flagged category using the decision-making rubric. The districts must verify that the students meet all four required criteria for eligibility for alternate assessment participation or take corrective action by reassigning the students to the appropriate assessment, when any of the required criteria are not met.

Public Comment on Plan

MDE communicated to the public its intent to request a waiver approval to exceed the 1% cap on alternate assessment participation for the 2026 assessment cycle and that MDE will implement this update to the initial compliance plan that MDE submitted to USED on May 10, 2024. The state superintendent of public instruction sent a memorandum to local and ISD superintendents, public-school academy (PSA) directors, ISD and LEA/PSA special education directors, and the statewide education associations, to seek public comment on the waiver request.

MDE gathered public comments through an online questionnaire which was open November 6, 2025, through November 29, 2025. Michigan collected public comment in response to the need for a waiver to test more than 1% of students using alternate assessments, the tiered approach to monitor and evaluate appropriate use of alternate assessments, the plan of activities involving flagged student case reviews, pre-registration warnings for high-risk student cases during test registration, the review for disproportionality, and the plan for providing targeted and directed guidance and feedback on the eligibility of high-risk student cases for the use of alternate assessments.

Below are the public comment request prompts, followed by the corresponding comments for each prompt. Overall Michigan received 18 comments. Among them several commenters stated their perspective, and collectively encompassed a variety

of stakeholder groups, ranging from parents, student advocates, educational administrators, teachers, school support staff. One advocacy group, the Autism Alliance of Michigan (AAoM), sent in a formal letter for public comment. The AAoM's comments are listed at the end of each prompt. Following all prompts and comments, you will find a summary response from MDE addressing the feedback received. Please note that, aside from specific names of individuals or locations, the comments have been transcribed as submitted.

Prompt 1:

Please share your comments regarding MDE applying again this year for a waiver to the ESSA 1% cap on alternate assessments.

Prompt 1 Comments:

1. In my experience as a parent, I do not see any reason why this Waiver should be approved. The over use of alternate assessments has been extremely harmful to my child's educational attainment and created many more hurdles in the way to for working toward a diploma and living an independent and economically viable life. The efforts by MDE seem to be misguided, or ineptly applied. The extensive use of multiple tiers of Mi-Access, for what is supposed to be 1% of the population, have created real harms and barriers. Please try to do better by students. It seems more like MDE has created a legalized pathway to segregation for any child with a disability who stands out or who seems to learn differently, to be written off by their educators, denied a diploma, denied a pathway to earning one, by those whose jobs exist to educate all students.
2. Michigan Department of Education is not doing enough to attempt to reduce the number of students taking the alternate assessment. The number of students taking it is consistently higher than in other states and leads to lower expectations of our special education students, lower special education graduation rates, and long term it leads to these students being more dependent on the state for support because they were held to a lower standard early on. In addition many of these students are put in segregated settings for more hours of the day, teaching them and their general education peers that they are different, "lesser than" individuals because they should not learn side by side in an inclusive setting.
3. I work as an advocate for families of students with disabilities, and am a fierce advocate for inclusion (education in the least restrictive environment). Last week, while attending an IEP meeting with a parent, the school team said that because the student was participating in General Education classrooms 50% or more of their day, they were not allowed to take the Mi-ACCESS assessments. The student in questions has cerebral palsy, a seizure disorder, multiple physical impairments that impacts their mobility, autism, and significant cognitive delays. The student is in 5th grade, but is a beginning reader and does not understand the mathematical concept of greater than/less than when provided single digit numbers. They recently moved to a new district, and their

previous district had them taking the Mi-ACCESS. However, their new district had been cited for being over the 1% threshold, and were told by the state that one of the data points they should use when determining the appropriate assessment is where the students spend the majority of their day. Therefore, they are refusing to allow the student to take the Mi-ACCESS and instead insist that the student take the M-STEP. The rationale for taking the M-STEP being based upon the amount of time a student spends in Gen Ed, is not legally compliant with IDEA and the student's right to be educated in the LRE. The student is able to make progress, and has made progress on their IEP goals, while attending the gen ed classrooms with modifications to their curricular expectations, and special designed instruction both in General Education and Special Education classrooms. The family wants their child included as much as possible in the Gen Ed setting as research shows that students, even with the most significant cognitive impairments, make greater gains socially, emotionally and academically when included with their same-aged typical peers. As a former special education teacher for 15 years, I do understand the need to safeguard against placing students in the alternative content standards without adequate data, and having exhausted all other interventions and specialized designed instruction efforts to ensure the student has had every opportunity to participate and make progress in the standard curriculum. However, making arbitrary caps that punish students for being included in the general education setting with modifications by forcing them to take wholly inappropriate assessments, is not logical. I do believe that the states revisions to the alternative assessment decision making has been helpful in alleviating this problem, and caused teams to look more carefully at ensuring all efforts are exhausted before moving to a non-diploma track. I have seen greater transparency from teams across the state the past few years when talking to families about placing students in more restrictive learning environments, and have suggested to families they wait and see before allow the school to move their child to the alternative curriculum, as it is difficult to get back on diploma track once they are taken off. This is a complicated issue for certain, as I have been on the end of receiving a student and family at the high school level that was on the alternative curriculum and did not know it, and we (as the high school team) had to inform the family of this at 9th grade, when this conversation should have happened the second they diverged from the standard curriculum. Nonetheless, caps do not solve the problem. Rather professional development, and accountability to teams on appropriate decision making would. What will happen if we insist on assessing students inappropriately is, schools scores may lower, students will not be properly assessed and we won't know how effective programs that serve the cognitively impaired are in teaching the alternative content standards, and many students/families will simply not attend for testing. The latter causing schools to not make their 95% attendance requirement. I support this waiver request! And would be happy to support the state and districts in further developing processes and protocols for determining appropriate assessments for individual

students. It is my opinion that the 1% cap on alternative assessments is not compliant with IDEA.

4. With the increase in significant cognitive disabilities the students are struggling with the accommodations that allows for general education curriculum to become accessible.
5. The overuse of alternate assessments is contributing to the lower graduation rates of students with disabilities because it takes them off the graduation track to earn a high school diploma. Alternate assessment participation in our state has remained unchanged for three consecutive years (2021-2022, 2022-2023, and 2023-2024). Michigan also administers one of the highest rates of alternate assessments of any state in the nation. Michigan's ongoing lack of progress results in thousands of students with disabilities being funneled to an assessment with much lower expectations, less exposure to the general education academic content standards, and limited access to satisfy requirements for a regular high school diploma. Students with marginalized identities are also disproportionately impacted by this.
6. no. Michigan does not deserve to receive a waiver. They have barely improved and still educate far too many students based on a certificate track; dooming many students to a second class future, all in the name of more alternate tests than are needed.
7. The Michigan department of education should not apply for or be granted a waiver again, just like in recent years of the waiver being rejected. Michigan's education leaders have flaunted the law for years at the expense of vulnerable students and those with low income, who at first glance may not be as easy to educate. The U.S. department of education has been pretty feeble and inept in allowing such a high degree of discrimination against students with disabilities to continue, and Michigan as a state, is one of the worst offenders in the country. If ESSA will not actually be enforced, then there is little reason for even having a U.S education department, or even maintaining the waiver facade. The waiver process is a joke. Michigan's educational leaders should be spared the effort of pretending that they are interested in a free and appropriate education for all students.
8. We understand the need for Michigan to apply again for the ESSA 1% alternate assessment waiver, particularly as the state continues working toward consistent and appropriate identification of students with the most significant cognitive disabilities. However, there remain challenges that must be addressed to ensure the waiver process is meaningful and that progress toward the 1% expectation is attainable. One concern is that the current tiered participation rate system is arbitrary and does not accurately reflect the context of center-based programs, which inherently serve higher concentrations of students with significant cognitive disabilities. Without considering adjusted rates for center-based districts, or returning the participation rates back to resident districts, the existing model creates unintentional consequences, including discouraging local districts from operating or expanding center-based programs. This undermines options for

students and creates capacity issues for existing centers that are already at or near limits. Additionally, districts still do not receive information on the assessment type taken for flagged students within the new Catamaran report. By not having quick access to the assessment type, it is difficult to validate or correct data used in determining their placement above the 1% threshold.

9. I am in favor of the MDE applying for a waiver to ESSA 1% cap on Mi-Access. This is a necessity. I have a cross-categorical classroom in my building that contains students with CI certification. Last year, even though are only exposed to curriculum on their level- essential elements- these students were still forced to take the test. To show growth annually on a general education test is not reality for these kids. The students that did take the M-STEP from the program were at the bottom of the scores in the grade level, leading me to ask the question- what is the point? The benchmarks for a special education student to take the test are unreachable for these students. The testing only makes for a day of confusion and frustration for them, and it's sad to see them go through this. At my building we reach kids where they are at, and this assessment is an affront to everything we do in differentiated education for our CI students.
10. Applying for the waiver is in the best interest of the students. Requiring students to take a state assessment that does not align with their goals and objectives is difficult for them.
11. For small schools it is often statistically difficult to go under the 1% rule. One extra student in a grade that we test can move me from .8% to 1.1% and the net year when that student move into the 9th grade, which we don't test I can fall way under. Schools should not be limited by a percentage that was arbitrarily chosen but look at on a case by case basis to see if they are using the decision making tree appropriately.
12. I agree that the state needs to apply for the waiver. I think that along we applying for the waiver we need to review the assessments we give as a state. I believe there will continue to be a need for the waiver if we continue to give the SAT/PSAT suit of tests.
13. I fully support it.
14. There should be a waiver to exceed the 1% cap as this decision is individualized based on the student's IEP.
15. It's ridiculous we must ask for a waiver each year when ESSA is quite clear on the 1% cap. Instead of continuing to apply for denied waivers each year, how about working with ISDs to make certain their schools meet the required 1% - period.
16. "AAoM COMMENTS on Michigan's plan to request another waiver to exceed the 1% cap:

While AAoM recognizes that the ESSA 1% cap does not function as a prohibition, Michigan's persistent and unusually high alternate assessment (AA) participation rates—unchanged for three consecutive years (2021–22 through 2023–24)—indicate systemic failures in ensuring appropriate assessment decision-making.

Despite multiple years of universal and targeted, district-directed activities, Michigan continues to test one of the highest proportions of students via alternate assessments nationally.

Michigan MI-Access Participation Rates by School Year and Subject			
School Year	ELA	Math	Science
2017-2018	2.2	2.2	2.0
2018-2019	2.1	2.0	1.9
2020-2021	1.7	1.7	1.8
2021-2022	1.8	1.8	1.8
2022-2023	1.9	1.8	1.8
2023-2024	1.8	1.8	1.8
2024-2025	1.5	1.6	1.6

Source: US Dept. of Education responses to Michigan waiver requests.

Percentages represent the statewide percent of total tested students taking MI-Access.

These persistent rates have significant long-term consequences. Thousands of Michigan students with disabilities—many of whom do not meet the four criteria for having a “most significant cognitive disability”—continue to be diverted into an assessment system that:

- Substantially lowers academic expectations,
- Reduces access to Michigan’s grade-level academic content standards, and
- Limits the opportunity to meet requirements for a regular high school diploma.

Many states were below the 1% cap when the provision took effect in 2017-2018, and several states initially over the cap have since been able to bring their AA rates into compliance. Those states, including some that were significantly above the cap in earlier years, have successfully reduced participation rates through stronger state oversight, clearer tools, and more transparent data reporting. Michigan has the capacity to do the same. We strongly urge MDE to take more decisive action in the coming year to finally meet the requirements of ESSA and improve outcomes for students.

The table below lays out the history of alternate assessment administration (known as the MI-ACCESS) in Michigan since the 1% cap requirement took effect in the 2017-2018 school year.

Historical MI-Access Participation and Waiver Decisions: Michigan							
YEAR	ELA		MATH		SCIENCE		Waiver to exceed 1% cap
	# accessed	%	# accessed	%	# accessed	%	
2017-2018	16,958	2.2	16,688	2.2	6,746	2.0	Approved
2018-2019	15,661	2.1	15,425	2.0	6,299	1.9	Approved
2020-2021	8,991	1.7	8,711	1.7	3,665	1.8	Approved
2021-2022	12,802	1.8	12,590	1.8	5,421	1.8	Approved
2022-2023	13,082	1.9	12,887	1.8	5,482	1.8	Denied
2023-2024	12,757	1.8	12,616	1.8	5,461	1.8	Denied
2024-2025	10,961	1.5	11,365	1.6	4,753	1.6	Denied
2025-2026	TBD						<i>pending</i>

Source: State Requests for Waivers of ESEA Provisions for SSA-Administered Programs.

Despite slight improvements in overall MI-Access participation rates during the 2024–2025 school year, persistent and troubling disparities remain. Data continue to show that African American students and students who are Economically Disadvantaged are disproportionately assigned to Michigan’s alternate assessment. These patterns—consistently higher participation rates than their white and non-economically disadvantaged peers—raise significant

concerns about equity, access to the general education curriculum, and alignment with federal requirements under ESSA and IDEA.

The continued overuse of alternate assessment for these student groups limits exposure to grade-level academic standards and reduces opportunities to earn a regular high school diploma. Even as statewide aggregate participation inches closer to compliance with the federal 1% cap, the distribution of who is taking MI-Access reveals a systemic issue: students with intersecting marginalized identities are more likely to be routed into a more restrictive and less rigorous assessment pathway.

This disparate impact underscores the need for targeted oversight, strengthened eligibility guidance, professional development for IEP teams, and clear public reporting designed to ensure that alternate assessment decisions are truly individualized and not shaped by bias, placement patterns, or resource gaps."

Prompt 2:

Please share your comments regarding MDE's plan for reducing the use of alternate assessments and balancing high expectations for students with support needs of students with disabilities.

1. I will believe it when I see it actually work. The efforts sound good. They allow MDE leaders to pay lip-service to actually caring about students. But in practices, MDE only seems willing to work on mitigating a poorly designed system that has made it considerable harder for my child to get access to a diploma-oriented education. But as long as we can keep more levels of MI-Access than any state or school would ever need, then MDE leadership can feel good about itself and the work it achieves. That is just the uncaring, and self-centered way that MDE leadership acts. They are heartless and their actions promote real discrimination against many students with disabilities, who are denied access to a diploma-track education. They should be held liable for damages for the thousands of students over the year's that have been harmed in the name of preserving 3 separate tiers of Mi-Access. How on earth could a standard for 1% of the population ever need 3 separate tests that students need to be filed into? Why should my child have to prove himself at every subject and every level for an entire year before he is even given a chance at working toward something more in line with what his neurotypical peers are receiving by default?
2. The intention of MDE's plan is right and good, however the implementation does not support the intention. Schools are still not being held accountable enough for putting too many students on the alternate assessment. In addition, the fact that there are three versions of the alternate assessment gives an inaccurate impression that some students who score well on the assessment testing higher learners should stay on it, when they should be

moved to the general education assessment. Michigan is the only state in the country with three tests. While it may have been an innovative idea years ago, it is not meeting the current needs of our students. Too many resources are being poured into these tests when they should be spent on putting in place resources for our students to have more success and support in the general education setting. My family worked tirelessly from the time my son with ASD was diagnosed at 2, giving him intensive treatment and early education. In fact I myself am a therapist, understanding the power of early intervention on changing the brain, allowing kids with disabilities to be successful once they are in school. But because my son was still delayed and different enough at a young age, our school fought to segregate and teach him alternate standards. We fought back. My son still needs adult support, but he is doing algebra and learning about cellular respiration in 8th grade, passing his classes and alongside his gen Ed peers. How many of Michigan's students are being kept from further success in life because MDE is not doing enough to push appropriate testing and support for these students? Too many.

3. I think the state's plan looks good on paper, but as you will see in my response to #1 it is imperfect when the counsel provided by the state to districts also is in conflict with IDEA. We need further fine tuning on how we work with districts that need support in examining why their numbers of students taking Mi-ACCESS are so high. It may be that you need more qualified people with knowledge and experience working in special education to work with schools who have been flagged for. Again, call me if you want help with this!
4. The goal is to provide students with even the most significant disabilities support to access the general education curriculum in the LRE.
5. The issue of current AA participation can be traced back to the three separate assessments. It is highly likely that many students placed on the MI-ACCESS Functional Independence assessment (used for about half of all students with disabilities on alternate assessments) should be taking Michigan's regular assessment instead. To date, none of the waiver requests from the Michigan Department of Education to exceed the ESSA 1% cap on alternate assessments have provided a breakdown of participation by disability category, race/ethnicity, or AA type. Without publicly available, disaggregated data, it is difficult to assess which students are being inappropriately placed on alternate assessments, and why. It is also critical that MDE step up its activities aimed at parents. The current materials and processes are overly complex and exclude many families from meaningful participation in decisions about graduation paths. Documented understanding from parents, tools/examples modeled for them, and accessible information (e.g., plain language) is essential.
6. The plan just sounds like smoke and mirrors. The Michigan department of education seems to be saying to the public: 'Pay no attention to the test makers behind the curtain.' They take no responsibility and show no remorse as they insist that we funnel more students into, not 1... not 2... but 3... 3(!)

completely separate alternate tests designed for 1% of the population. Who ever heard of such a ridiculous idea! Yet this is the line that they sell and expect everyone to just accept as status quo and unchangeable. It needs to change and MDE needs to take responsibility and do better for its students.

7. This waiver plan sounds good but does little to nothing to address the underlying bloat of alternate testing. Who on earth would be so gullible, so naive as to buy the lie that 1% of students need to be broken out into 3 separate levels, who each need their own special alternate test based on their own special set of alternate standards. Whoever heard of such a silly thing. Only in Michigan. I would like to meet the charlatans who keep selling that lie. Only educational leaders in Michigan are so foolish as to buy that.
8. We appreciate the state's continued work to ensure that alternate assessment decisions are individualized and aligned to high expectations for all students. To strengthen this work, I recommend several improvements: Update the MI-Access TA training video and the interactive decision-making tool. Both resources are outdated and need enhancements to better reflect current guidance, instructional expectations, and examples that help IEP teams make more accurate, defensible decisions. Remove Functional Independence as an alternative assessment option within the decision-making process. This criterion unintentionally inflates participation in MI-Access. Eliminating it would more accurately represent the population intended for alternate assessment and would likely bring the state closer to the 1% participation cap. The current spreadsheet required as part of the justification process is overly cumbersome. Consider developing a smarter, more automated system that improves the efficiency of the review process.
9. Careful monitoring is needed to assure that those students taking the MI-Access are appropriately identified.
10. As I mentioned above, everything we do in teaching and learning should yield a measure to show growth. To do that, however, we must assess students with the proper tools. We would never measure the progress an adult has made on a test that doesn't accurately measure what they learned! This needs to be fixed so that our kids are fairly assessed with against the curriculum that connects with the IEP.
11. While I do agree that we need to hold high expectations for students with disabilities, I also believe there are students who do not fall into the CI eligibility but would still benefit from an alternative assessment. There are other ways to assess a student that does not involve them taking an online assessment that covers a fast array of standards that will not serve them in lifelong goals later in life. If anything, MDE should be looking at MORE alternative assessments that can be used for our students with disabilities.
12. Forcing students with cognitive impairments to take a test that will provide no useful measurement of data is not only a waste of time but harmful to the student's relationship with the school but also the school's relationship with the family of these students. You have a high expectation by giving them a test

that is actually appropriate to them and can give you a measurement of what they can actually achieve.

13. While I agree that we need to have high expectations for all students I disagree with the assessments we are asking students to complete. Students who are cognitively impaired and working well below grade level should not be subjected to the SAT/PSAT assessments. Even with accommodations these students have not learned this concept and therefore are unable to successfully take that assessment. The state's definition of most significantly cognitively impaired versus the local districts' definition does not match. If students have a higher reading ability than their math ability we are then forcing a child to take an assessment in math concepts they have not been exposed to.
14. See below.
15. The high expectations are needed, but the 1% is an arbitrary number.
16. The plan is time-consuming and obviously has not been working or we wouldn't be asking for a waiver - yet again. Stop focusing on what we cannot do and hold districts and ISDs accountable if they exceed the 1%. Withhold IDEA funding for the percentage any district exceeds the 1% cap. If you are at 2%, 1% of funding withheld, testing at 1.4% - then .4% of funding withheld.
17. I do not understand why a student who is receiving a modified curriculum and therefore going to be receiving a certificate of completion versus a diploma would need to go through the stress of taking a test that tells them and their families nothing. I am so sad for my students with significant cognitive impairments that they will have to endure the stress of this and I am not looking forward to dealing with the fallout as the behaviors intensify during MSTEP time.
18. AAoM COMMENTS on MDE's 2026 plan to reduce alternate assessment use and promote high expectations:

AAoM appreciates that the 2026 plan lowers Tier 2 and 3 thresholds by 0.5% and adds clearer requirements for student-level case reviews.

However, the current plan again fails to address the primary driver of Michigan's unusually high AA participation rate: the continued use of three separate MI-Access assessments—Functional Independence (FI), Supported Independence (SI), and Participation (P).

A. Lack of transparency about participation patterns across MI-Access levels (FI, SI, and P)

AAoM has repeatedly urged MDE to publicly report disaggregated data, including:

- Participation rates for MI-Access FI, SI, and P individually
- Participation rates by disability category

- Participation rates by student subgroup (race/ethnicity, EL status, socioeconomic status, gender, etc.)
- Patterns that may reveal disproportionate assignment.

No waiver request to date has provided transparency for disaggregated AA participation by disability category, making it impossible for the public to evaluate whether MI-Access FI is being used as a "default" pathway for students with disabilities—including autistic students—whose needs could be met within the general assessment system with accommodations.

Evidence strongly suggests that a substantial portion of students assigned to MI-Access Functional Independence (which accounts for roughly half of all AA participants) should in fact be participating in Michigan's regular assessments with accommodations.

B. Parent information and consent tools must be standardized statewide

Given the profound impact AA decisions have on diploma access and curriculum pathways, MDE—not local districts—should author and require:

- standardized consent forms
- clear and accessible parent information, and
- explicit documentation of parent understanding

C. Decision-making tools remain overly technical and inaccessible for families

Parents continue to report that the new decision-making rubric is overly technical, unclear, and intimidating. Tools intended to support parents' meaningful participation in decision-making must be:

- co-developed with disability and parent organizations,
- written in plain language, and
- accompanied by modeled examples, videos, and real-world scenarios.

Prompt 3:

Please share any other comments or thoughts regarding the waiver to test more than 1% of students using alternate standards for instruction and assessment.

1. Parents and educators do not make decisions in a vacuum. The State is establishing and framing the choices that are presented. When those frames steer and funnel people to think about separation, to thinking about lower standards, to limit educator's perceptions of a student's capabilities and thereby limit his or her access to a quality education and chance to work toward a diploma, then those systems cause and perpetuate real harms. I will continue to fight for my child and his educational rights, but many others are not as fortunate, and I feel that many problems have popped up simply because of the framing to educational options. Success and opportunity among those with disabilities should not be limited to the lucky and the few; the

systems should encourage and promote that success that sets students up better for independent living. And the 3-tier system of MI-Access is a deeply flawed system that harms students by limiting and sub-categorizing the instruction they receive, and educator's perception of what students can do. Reform the Mi-Access system, and you will begin to see things really turn around in Michigan. And for students like my son with a disability, those types of real reforms, can make all the difference in the world.

2. It is unfortunate that parents are kept in the dark on this issue. What are you doing to help parents understand what their options are? If parents truly understood their children's potential and were made aware of what Michigan is doing, and the quality lacking compared to other states, they would not be happy. Why are you not asking for parent feedback on this issue? I hope you decide to put students first rather than your own insistence on doing what's always been done. When we know better, we can do better. Please, please do better.
3. I would like to be a part of the solution to this issue. Please think of me if you need people to serve on a statewide team or support schools who are being flagged for inappropriately placing students, as there should never be criteria that excludes a student from their appropriate assessment based upon where they are educated (LRE).
4. At this time, there is an increase in the number of students entering the district with cognitive disabilities that have limited achievement capacity and create a high level of frustration in learning and completing the high-stakes assessments.
5. MDE should develop a statewide Alternate Assessment Advisory Group that consists of educators, ISDs, and Michigan advocacy organizations. The Special Education Advisory Committee (SEAC) does provide input on alternate assessments, but does not adequately provide the input, structure, and space for advocacy from a variety of stakeholders that is necessary for this issue. Collaboration with Michigan Alliance for Families is another resource that could assist MDE in addressing the overuse of AA (e.g., webinars, videos, walking parents through decision-making). Finally, incorporating strategies from the Autism Alliance submitted a Blueprint for Alternate Assessment Cap Compliance would help create meaningful change for students with disabilities in Michigan. The Blueprint was submitted to the Department in November 2024, followed with public comment on the state's waiver requests, and outlined steps the state department can take to address this issue. I urge the Department to act with urgency to move students who have been inappropriately placed by addressing the issues that allow these patterned inequities to persist.
6. Until Michigan addresses the bloat in alternate assessments, too many students are going to be labeled, sorted, and written off as unable to learn and not worthy working toward a diploma... not worthy of a future. And Michigan will continue to fall behind the times.

7. Students in Michigan deserve better than this. Students with disabilities and whose parents don't have a lot of money deserve a better education than what they are given. Inventing more alternate tests and more alternate standards than what is needed for just 1% of the students is not evidence based. It's just an excuse to leave more students behind. This is the type bias George W. Bush called "the soft bigotry of low expectations." It's the bias he sought to remedy with educational law and reform. Do better Michigan. Do better.
8. There are several opportunities for improving the waiver implementation, monitoring, and data submission processes: All activities, submissions, and monitoring should occur directly in Catamaran, rather than routing through ISDs as intermediaries. Maintaining ISDs as the middle point is time-intensive and diverts resources that could otherwise be used to directly support districts in making sound assessment participation decisions. Continue strengthening the review process in Catamaran to promote consistency statewide and allow MDE to more efficiently identify patterns, technical assistance needs, and potential areas of disproportionality. Last, is also encouraged that the department create an FAQ (or some other form of additional TA) to address common questions, such as "what do I do if a student doesn't meet criteria as having the MSCD but is unable to benefit from or demonstrate learning of the general content standards. This is not uncommon for a student to have a cognitive disability AND also have extensive support needs. Districts are in need of practical guidance and assistance on how to support this subset of students.
9. I have had the experience of determining the use of the MI-Access for several years. It is definitely of concern as it is very important to make sure that those students who have severe cognitive handicaps have opportunity to demonstrate their abilities. The M-Step can be a very intense and traumatic experience for those students who are truly unable to perform successfully using this assessment. The MI-Access provides another assessment avenue that should be available to those who qualify regardless of the 1% cap.
10. The M-STEP is already a challenge for our general education students, I cannot imagine how anyone can justify this for CI certified students. Let's do what's right for kids!
11. If there is an option to get a waiver, then it means that ESSA is aware that not everyone will "Fit into a box". It appears that it is more of a best practice, rather than a requirement. MDE should apply for the waiver every year.
12. Schools with higher levels of poverty are going to see more students with cognitive impairments to say otherwise is not based in reality.
13. The waiver helps support those students who really need to be taking an alternate assessment. If we really want to fix our state assessment issue then we need to look at the actual assessments we are requiring students to take.
14. The 1% figure is an arbitrary number with no inherent statistical value. 2% is equivalent to 2 standard deviations below the mean, which is statistically significant and has historically been equated to designation of "Impaired" along the bell curve. In Michigan, the development of the Functional Independence

version of MI-ACCESS is often deemed developmentally appropriate for students falling within the mild range of cognitive impairment (Standard scores between 55-70).

The Supported Independence version of MI-ACCESS is often deemed developmentally appropriate for those falling within the moderate range of cognitive impairment (Standard scores between 40-55), while the Participating version of MI-ACCESS is often deemed developmentally appropriate for those falling within the severe range of cognitive impairment (Standard scores below 40).

We are currently spending a significant amount of staff and administrative time denying students access to developmentally appropriate assessments, just to indicate that 1% or less of our students are taking the alternative assessment.

I don't understand why the three versions of the alternative assessment were developed in the first place, if we are being instructed not to use them in order to hit an arbitrarily selected percentile of 1%. It seems like a waste of time to me.

15. Data shows 1.2% of Michigan students have the most significant cognitive disabilities, yet 1.8% were taking the test in 2023. Maybe it's more important to get information to districts like this presentation reports: <https://gomasa.org/wp-content/uploads/D4-S24-MI-Access-MSTC-Clinic-D4.pdf>. So much time and effort is going into applying for the waiver. Let's make it happen in a different way - what we are doing obviously isn't working since we must apply for waivers every year. Time to hold districts accountable.
16. I don't even think that districts should need to apply for a waiver. I think that if a regulatory agency suspects that a district is misusing the alternative assessments by giving it to too many students, then that particular district needs that regulatory agency to step in and ensure that there is not an evil administrator somewhere putting all of his students through alternative testing instead of the MSTEP.
17. AAoM COMMENTS related to the waiver and MDE's systemic responsibilities:

A. Establish an Alternate Assessment Advisory Group:

AAoM again urges MDE to convene a statewide Alternate Assessment Advisory Group that includes disability and advocacy organizations (AAoM, The Arc of Michigan), Michigan Alliance for Families, Disability Rights Michigan, ISDs, and local educators. This group should review existing tools, identify weaknesses, and recommendations for improvement.

There is no public evidence that such a group exists. This recommendation has been made repeatedly in AAoM public comments yet remains unaddressed.

MDE's reliance on the broader Special Education Advisory Committee (SEAC), the federally-mandated IDEA advisory body, to provide input on alternate assessments is not an adequate substitute. The scope for SEAC is broad, it operates under an agenda controlled by the Office of Special Education, and is not an advocacy-focused committee. As such, SEAC lacks the stakeholder-driven structure needed to provide meaningful input from parents, advocates, and community organizations.

The absence of a dedicated advisory group represents a significant gap in transparency, stakeholder engagement, and systems-level accountability. Without such a body, parents, advocates, and disability organizations do not have a structured, consistent forum to influence alternate assessment policies, eligibility criteria, data reporting, or resource development.

B. Strengthen MDE's collaboration and investment in parent-facing organizations

AAoM encourages MDE to enhance its collaboration with Michigan Alliance for Families (MAF) by supporting the development and dissemination of robust, accessible, and parent-focused resources explaining alternate assessments and the process for determining student participation.

Currently MAF primarily provides links to MDE materials. The 2026 MAF calendar of events includes no events specifically focused on assessment participation decisions.

AAoM recommends that MDE invest in resources such as webinars, podcasts, short videos, and modeled decision-making scenarios demonstrating the use of the decision flowchart, "Should My Student Take the Alternate Assessment?," to promote informed and meaningful parent participation while navigating high-stakes decisions regarding alternate assessments.

C. Incorporate AAoM's 2024 Blueprint for Alternate Assessment Cap Compliance

The AAoM Blueprint for Alternate Assessment Cap Compliance (submitted November 1, 2024) provides implementable strategies for reducing over-reliance on alternate assessments and ensuring that students with disabilities have access to high-quality, inclusive education aligned with grade-level standards. To date, these recommendations have not been acknowledged or reflected in Michigan's ESSA 1% Cap Waiver plans.

Integrating the AA Cap Compliance Blueprint into MDE's planning would represent a meaningful step toward structural reform, federal compliance, and equitable outcomes—particularly for autistic students and others

disproportionately impacted by current practices. We hope the MDE will consider including these recommendations in its 2025-2026 waiver request. Michigan's continued over-reliance on alternate assessments limits the educational trajectories of thousands of students with disabilities every year. AAoM urges MDE to adopt more ambitious reforms that align with federal law and uphold high expectations and equitable access for all students.

AAoM welcomes the opportunity to collaborate with MDE in advancing meaningful improvements in alternate assessment policy and practice that support both compliance and student outcomes.

Response to Public Comment:

MDE received 18 distinct responses from our request for public comment. MDE acknowledges both the concerns raised and support for the waiver and thanks all of those willing to provide public comment on the Waiver plan. Below, are MDE's responses to some of the recurring themes in the public comment:

1. The Michigan Department of Education's combined efforts from members of both the Office of Special Education (OSE) and the Office of Educational Assessment and Accountability (OEAA) are beginning to collect more stakeholder feedback about Michigan's alternate assessment system. Staff have met with the Advisory Committee for the OEAA, who, in their meeting notes from 11-20-25, pg. 10, have "called for broader stakeholder engagement", recommending "gathering feedback through multiple channels—surveys, conversations, and possibly a statewide roadshow." And in this waiver plan, MDE stated it plans to reach out to the following stakeholder groups to gather ideas around our alternate assessment system: parents, special education teachers/administrators, advisory groups, advocates, and assessment administrators. Comments from this waiver regarding the alternate assessment system in Michigan will also be integrated into that overall feedback.
2. Several public commentators in recent years, including this one, have also called for developing an Assessment of Students with Disabilities Advisory Committee. MDE will consider the development of this stakeholder assessment advisory committee further, after collecting stakeholder input on the alternate assessment system, to allow such conversations to continue over time.
3. Some of the requested additional publicly available data cited such as participation rates by disability type and by Level of Mi-Access assessment have been shared at conferences in the past few years and are available by MDE upon request.
4. The 1% as a cap is in the federal statute and is not up to Michigan to change. The 1% threshold is informed and shaped over the years, primarily during the development of the No Child Left Behind Law, the predecessor to the current ESSA law. This threshold represents a compromise on what portion of population may have the most significant cognitive disability, between 3 and

2.5 standard deviations below typical age-level cognitive abilities. Additionally, data reviewed by McGrew & Evans (2004) suggest that the 1% threshold helps to minimize false positives when trying to use cognitive measures to predict which students have the most significant level of impairment and would not likely be able to work with general age-appropriate academic content.

5. Several public commentators called for a more automated, easy to use decision making tool regarding what assessments and educational standards to work toward for students with disabilities. At MDE, work is currently being done to update the online Interactive Decision-Making Tool to align with the current rubric, but to do so in a way that is easy for districts and schools to use and for parents to understand. This tool is expected to be available by the end of the 2025-2026 school year.
6. Several public commentators called for more informed parent consent and more clear resources for parents of students with disabilities, regarding assessments and instructional standards. While parental consent for alternate assessments varies from district to district, MDE's current waiver plan this year and the previous year, required that ISDs work with Tier 3 districts to help standardize the parental informed consent process. Several good models are beginning to emerge from this process and are helping to establish better practices in the parent consent process. Additionally, parent resources, such as the [Family Matters](#) resource, supported by the MDE, Office of Special Education, are periodically updated. MDE is in the early stages of updating or creating a fact sheet resource for parents around the appropriate use of assessments, modifications, and accommodations for students in instruction and assessment.

Waiver Requirements

ESSA stipulates several requirements for the waiver to exceed the 1% cap. MDE's response to each requirement is found below. Please note the data provided is information from the most recent testing window (Spring 2025) in which state assessments were administered.

Requirement 1:

Submit the waiver request at least 90 days before the testing window starts for the relevant subject.

The testing window for all state summative assessments in Michigan begins April 6, 2026. Specifically, the seven-week testing window for MI-Access (the state summative alternate assessment based on alternate academic achievement standards) is from April 6, 2026, through May 22, 2026. The waiver request is being made 90 days prior to this testing window.

Requirement 2 (A):

Provide state-level data from the current or previous year that shows the number and % in each subgroup who took the alternate assessment in the subject area.

As shown in Tables 1-3 below, the rate of alternate assessment for Spring 2025 is 1.5% for English language arts (ELA), and 1.6% for math and science. This demonstrates a reduction in alternate assessment rates by three tenths for ELA and two tenths for math and science, when compared to the rates of 1.8% that Michigan held for three previous years.

Table 1: 2024–25 **English Language Arts (Grades 3-8 and 11)** Participation in Alternate Assessment, MI-Access, by Content Area and Demographic Sub-Group

Demographic Sub-group	Number of Students Tested Using an Alternate Assessment	Total Number of Students Tested	% of Students Tested Using an Alternate Assessment
All Students	10,961	708,112	1.5%
Students with Disabilities	10,961	102,885	10.7%
Male	7,341	362,415	2.0%
Female	3,620	345,697	1.0%
English Learner	804	51,925	1.5%
Economically Disadvantaged	7,306	368,752	2.0%
Native American	74	4,015	1.8%
Asian	360	27,085	1.3%
African American	2,977	126,457	2.4%
Hispanic	994	66,063	1.5%
Pacific Islander			
White	5,973	445,176	1.3%

Demographic Sub-group	Number of Students Tested Using an Alternate Assessment	Total Number of Students Tested	% of Students Tested Using an Alternate Assessment
<i>Multi-Racial</i>	575	38,745	1.5%

Table 2: 2024–25 **Mathematics (Grades 3-8 and 11)** Participation in Alternate Assessment, MI-Access, by Content Area and Demographic Sub-Group

Demographic Sub-group	Number of Students Tested Using an Alternate Assessment	Total Number of Students Tested	% of Students Tested Using an Alternate Assessment
All Students	11,365	710,136	1.6%
Students with Disabilities	11,365	103,180	11.0%
Male	7,596	363,542	2.1%
Female	3,769	346,594	1.1%
English Learner	838	53,879	1.6%
Economically Disadvantaged	7,604	369,907	2.1%
Native American	86	4,038	2.1%
Asian	366	27,571	1.3%
African American	3,136	126,626	2.5%
Hispanic	1,033	66,808	1.5%
Pacific Islander			
White	6,136	445,763	1.4%
Multi-Racial	599	38,750	1.5%

Table 3: 2024–25 **Science (Grades 5, 8, and 11)** Participation in Alternate Assessment, MI-Access, by Content Area and Demographic Sub-Group

Demographic Sub-group	Number of Students Tested Using an Alternate Assessment	Total Number of Students Tested	% of Students Tested Using an Alternate Assessment
All Students	4,753	302,344	1.6%
Students with Disabilities	4,753	41,061	11.6%
Male	3,148	154,637	2.0%
Female	1,605	147,707	1.1%
English Learner	299	21,049	1.4%
Economically Disadvantaged	3,143	150,023	2.1%
Native American			
Asian	147	11,709	1.3%
African American	1,257	52,383	2.4%
Hispanic	392	28,211	1.4%
Pacific Islander			
White	2,673	192,329	1.4%
Multi-Racial	255	15,743	1.6%

Requirement 2 (B):

Provide state-level data from the current or previous year that shows the overall assessment participation rate for all students and for students with disabilities.

In the spring 2022, due to ongoing absences, remote learning options, and instability in enrollments during the COVID-19 pandemic, Michigan had approximately 25,000 fewer students enrolled and tested in Spring 2022 than anticipated. For Spring 2023 and 2024, the student enrollment and testing counts increased and were more in line with expected long-term demographic trends. In 2025, compared to the spring of 2024, the overall number of students tested was up by roughly 3,000 students in 2025 for ELA and math, and by about 6,000 students for science. Among students

with disabilities, there were roughly 2,000 more students who tested in ELA and math, and about 1,000 more students in science.

Overall, for math, ELA, and science Michigan had more than 95% of all students participate in statewide summative assessments, and more than 95% of students with disabilities participated in math and ELA as well; however, for science, the participation rate among students with disabilities fell slightly short of 95% (see Tables 4-6 below). MDE OSE continues to make available a parent-friendly webinar and fact sheet on the importance of all students participating in statewide summative assessments. MDE OSE also meets with various parent groups where staff emphasize IDEA as a civil rights law, including statewide assessment participation. MDE sends out quarterly memos to all school administrators with a reminder of participation expectations.

Table 4: 2024–25 **English Language Arts (Grades 3-8 and 11)** Students Participating in State Summative Assessment (M-STEP, MME, MI-Access), Overall and for Students with Disabilities by Content Area

Demographic Sub-group	Number of Students with Valid Tests	Number of Students Expected to Test	% of Students Participating in State Tests
All Students	708,112	723,933*	97.8%
Students with Disabilities	102,885	106,443	96.7%

Table 5: 2024–25 **Mathematics (Grades 3-8 and 11)** Students Participating in State Summative Assessment (M-STEP, MME, MI-Access), Overall and for Students with Disabilities by Content Area

Demographic Sub-group	Number of Students with Valid Tests	Number of Students Expected to Test	% of Students Participating in State Tests
All Students	710,136	723,933*	98.0%
Students with Disabilities	103,180	106,443	97.0%

Table 6: 2024–25 **Science (Grades 5, 8, and 11)** Students Participating in State Summative Assessment (M-STEP, MME, MI-Access), Overall and for Students with Disabilities by Content Area

Demographic Sub-group	Number of Students with Valid Tests	Number of Students Expected to Test	% of Students Participating in State Tests
All Students	302,344	312,802*	96.6%
Students with Disabilities	41,061	43,225	94.9%

***Note:** The number of students expected to test is based on public enrollment counts in tested grades during the Spring 2025 student counts and data collection window. *EDFacts* tables with enrollments based on a combination of Fall enrollment and unique enrollment updates at the time of test registration, including other accountability and Federal reporting criteria, were not yet available in time for the waiver. The two-count windows generally provide similar counts and participation rates.

Requirement 3 (A):

Provide assurance that districts over 1% participation in the alternate assessment followed the state’s participation guidelines.

For the 2025–26 academic year, MDE will continue to use justification forms collected in the Special Education Compliance Monitoring System, Catamaran, as the mechanism to collect individual LEA and ISD responses and justifications for exceeding the 1% cap. Justification forms are also the mechanism for LEAs and ISD to provide plans for continuous improvement in preparing IEP teams to determine appropriate assessment selection for students with disabilities by following the state’s participation guidelines and federal requirements. MDE will also continue to develop and provide technical assistance through guidance documents, training, and other resources, specific to alternate assessment selection.

Many LEAs have provided training to staff regarding the state guidelines for participation in the alternate assessment. Timely and targeted guidance includes:

- Warnings in the test registration system for students with disability types and other student data not congruent with either the student having the most significant cognitive disabilities or receiving a majority of instruction based on alternate content expectations.
- Flagged high-risk cases for ISD to review with districts with high rates of alternate assessment use.
- Clarifying each of the required criteria needed for a student to meet the definition of a student with the most significant cognitive disabilities and an emphasis on using sound, valid, and reliable criterion-relevant indicators for

each aspect of the definition of a student with the most significant cognitive disabilities.

- Clarifying the requirements around primary instruction and educational goals being based on alternate content expectations.
- Having districts with high rates of alternate assessment develop parent information and consent forms to use in the IEP process. The parent information and consent forms ensure that parents and all IEP Team members understand the required criteria to be eligible for alternate assessments and discuss the strong association between the use of alternate content expectations aligned with educational goals and the potential impact on the student's ability to earn credits toward a high school diploma.
- Providing Tier 3 districts direct technical assistance in understanding the state participation guidelines by the part-time contractor hired by MDE OSE.

Requirement 3 (B):

Provide assurance that any disproportionality in students taking the alternate assessment will be addressed.

Michigan examined disproportionality participation rates on its state alternate assessment (MI-Access) based on the most recently completed test cycle (Spring 2025) for statewide summative assessments. Disproportionality was examined for the following demographics:

1. Gender
 - a. Male
 - b. Female
2. Economic Disadvantage (based on poverty risk factors such as free/reduced lunch eligibility, homelessness, migrant status, and direct certification for government food assistance)
 - a. Disadvantaged
 - b. Not Disadvantaged
3. Racial/Ethnic Groups
 - a. Native American
 - b. Asian
 - c. African American or Black
 - d. Pacific Islander
 - e. Hispanic
 - f. White
 - g. Two or More Races
4. English Language Learners Status
 - a. Participating in an English learner program
 - b. Not participating in an English learner program

To determine whether substantive disproportionality affected any subgroups of students, Michigan used a relative risk ratio method to analyze the rate of

participation in alternate assessments. For other federal reporting (e.g., in the Annual Performance Report), Michigan uses multiple years of data and a threshold risk ratio of 2.5 for each demographic subgroup. For assessments, this threshold means students in one demographic are participating in the alternate assessment 2.5 times more often than students who are not in the same demographic. A relative risk ratio of 1.0 means students in one demographic participate in the alternate assessment at the same rate as students who are not in the same demographic.

As depicted in Tables 7 through 12, the sub-group of students with the highest relative risk ratio was male students, in the subject of ELA, who, had a relative risk of 2.0. In other subjects, male students, economically disadvantaged students, and African American students were more likely to be assigned to alternate assessments, but none reach the elevated risk threshold of 2.0. In the past, students from economically disadvantaged households were more than twice as likely to be assigned to alternate assessments, but their level of risk for mis-assignment has declined and remained below the elevated risk threshold of 2.0 for the past 2 testing cycles.

Table 7: Simple Groups Disproportionate Alternate Assessment Participation by Demography (SY 2024-25) for English Language Arts

Simple Groups	Group Rate Comparison (In-group vs. not)	Risk Ratio
Gender (Male vs Female)	2.0% vs. 1.0%	2.00*
Economic Disadvantaged	2.0% vs. 1.1%	1.82
English Language Learner	1.5% vs. 1.5%	1.00

***Note:** Risk ratios between 2 and 2.4 are considered elevated risk and risk ratios \geq 2.5 are considered disproportionately high representation among students taking the alternate assessment.

Table 8: Multi Groups Disproportionate Alternate Assessment Participation by Demography (SY 2024-25) for English Language Arts

Multi-Groups: Race/Ethnicity	Group Rate Comparison (In-group vs not)	Risk Ratio
Native American	1.8% vs. 1.5%	1.16
Asian	1.3% vs. 1.6%	0.84

African American	2.4% vs. 1.4%	1.75
Hispanic	1.5% vs. 1.6%	0.97
Pacific Islander	1.4% vs. 1.5%	0.90
White	1.3% vs. 1.9%	0.69
Two or More Races	1.5% vs. 1.6%	0.97

Table 9: Simple Groups Disproportionate Alternate Assessment Participation by Demography (SY 2024-25) for Math

Simple Groups	Group Rate Comparison (In-group vs. not)	Risk Ratio
Gender (Male vs Female)	2.1% vs. 1.1%	1.91
Economic Disadvantaged	2.1% vs. 1.1%	1.91
English Language Learner	1.6% vs. 1.6%	1.00

Table 10: Multi-Groups Disproportionate Alternate Assessment Participation by Demography (SY 2024-25) for Math

Multi-Groups: Race/Ethnicity	Group Rate Comparison (In-group vs. not)	Risk Ratio
Native American	2.1% vs. 1.6%	1.31
Asian	1.3% vs. 1.6%	0.81
African American	2.5% vs. 1.4%	1.77
Hispanic	1.5% vs. 1.6%	0.93
Pacific Islander	1.6% vs. 1.6%	1.00
White	1.4% vs. 2.0%	0.71
Two or More Races	1.5% vs. 1.6%	0.94

Table 11: Simple Groups Disproportionate Alternate Assessment Participation by Demography (SY 2024-25) for Science

Simple Groups	Group Rate Comparison (In-group vs. not)	Risk Ratio
Gender (Male vs Female)	2.0% vs. 1.1%	1.82
Economic Disadvantaged	2.1% vs. 1.1%	1.91
English Language Learner	1.4% vs. 1.6%	0.88

Table 12: Multi-Groups Disproportionate Alternate Assessment Participation by Demography (SY 2024-25) for Science

Multi-Groups: Race/Ethnicity	Group Rate Comparison (In-group vs not)	Risk Ratio
Native American	1.6% vs. 1.6%	1.02
Asian	1.3% vs. 1.6%	.82
African American	2.4% vs. 1.4%	1.72
Hispanic	1.4% vs. 1.6%	0.88
Pacific Islander	0.8% vs. 1.6%	0.51
White	1.4% vs. 1.9%	0.74
Two or More Races	1.6% vs. 1.6%	1.02

Additionally, for each LEA, Michigan examined the Spring 2025 data as well as the two most recent years of alternate assessment administrations for participation in mathematics and ELA. Districts that tested the same sub-group of students 2.5 or more times as often as students who were not in that sub-group, for two or more years, were flagged for more targeted support and review as part of the justification form and review process. In all, there were 17 districts with disproportionate use of alternate assessments spread across 10 ISDs. Findings have been shared with ISDs and districts as part of targeted guidance and ISD staff will be trained to identify and support districts with substantively high disproportionate use of alternate assessments. For districts to be included in the disproportionality analyses and identification process, two minimum N-sizes were employed for each year of data:

1. Districts with 30 or more total students tested using the alternate assessment were examined for over-assignment.

2. Districts with at least 10 students from any demographic subgroup tested using the alternate assessment were evaluated for over-assignment of that subgroup.

Requirement 4 (A):

Submit a plan and timeline by which the state will improve the implementation of its participation guidelines, including if necessary, revising its definition of “students with the most significant cognitive disabilities” in future academic years.

The Michigan Department of Education will do each of the following:

- Continue to use the November 2024 updated Rubric for Assigning Students to Alternate Standards for Instruction and Assessment requiring the review of relevant data around each of the 4 required criteria for being eligible for the use of alternate assessments. The rubric clarifies and reduces ambiguity in decision-making by scaling the magnitude of the student’s current functioning and supports, along a continuum from no impairment or support needs to the most significant impairment or support needs. It can be found at [Rubric for Assigning Students to Alternate Standards for Instruction and Assessments](#).
- Implement the new “Interactive Decision-Making Tool” that supports the rubric outlined in the next bullet.
- Continue to use and provide clarity and training on the decision flow chart “Should My Student Take the Alternate Assessment?” that was updated in August 2025. The flow chart is a guidance document that supports the identification of students who qualify for alternate assessments. This guidance document improves on past versions by explicitly clarifying the four necessary criteria to be eligible for alternate assessments as well as exclusion criteria for students who should not take alternate assessments (including specific types of disabilities that are not compatible with the most significant levels of cognitive impairment). This resource is available at: [Should My Student Take the Alternate Assessment?](#)
- Continue expecting ISDs and districts with Tier 2 and 3 alternate assessment rates with more than 1% of students using alternate assessments in early fall to begin completion of justification form activities. ISDs and districts with Tier 2 or 3 alternate assessment rates will receive lists of students at high risk for misassignment to alternate standards in October 2025. ISDs and districts will be required to use the updated rubric and complete a high-risk summary to document the review of criterion-relevant data to determine if each student assigned to alternate assessments meets all four of the required criteria.
- Begin directly collecting student data that identifies which students have the most significant cognitive disabilities and who may appropriately take alternate assessments. Beginning in fall 2025, districts have an option to use a new code in MSDS for this purpose.
- Continue the practice that when test pre-ID and registration begins; test administrators will receive pre-registration warnings in the MDE Secure Site

when student cases may not meet one or more of the required criteria to qualify for an alternate assessment.

- Begin gathering representative stakeholder feedback from special education and disability stakeholder groups, including parents, special education teachers/administrators, advisory groups, advocates, and assessment administrators, regarding views and priorities for innovations in alternate assessment systems, including adaptive assessments, and identify desired modifications, if any, that may be warranted to make it relevant to today's students.
- Continue the practice of providing targeted technical assistance to LEAs to increase access to general education curriculum and instruction for students transitioning from the alternate assessment. Michigan estimates that, at least 6,800 enrolled students, currently working toward alternate standards will benefit from technical assistance.

Requirement 4 (B):

Submit a plan and timeline by which the state will take additional steps to support and provide appropriate oversight to each LEA that the state anticipates will assess more than 1% with the alternate assessment.

Planned Activities

Each ISD must revise and implement monitoring procedures and evaluation methods to align with state guidelines for participation in the alternate assessment.

MDE will continue to use a multi-tiered system of support in 2025-26 with the following updated criteria in response to USED's increased emphasis on verification of alternate assessment appropriateness. To reach more districts and further reduce Michigan's alternate assessment rates, the threshold for Tier 2 was reduced by five-tenths of a percent, and by five-tenths of a percent for Tier 3, compared to the previous academic year.

All districts with alternate assessment rates exceeding 1% will complete justification forms and receive universal, general guidance on inclusion criteria for alternate achievement standards in assessment and instruction. For districts with small student populations (less than 300 tested students) or where fewer than five students taking alternate assessments puts them over 1%, they will be assigned to Tier 1 supports. Otherwise, districts with alternate assessment rates between 1.1 and 1.2% and that have not disproportionately over-assigned any demographic subgroup of students to alternate assessments, the universal supports and guidance will be the primary form of support provided.

Districts with either alternate assessment rates between 1.3% to 1.9% and that have disproportionately over-assigned some sub-group of students to take alternate assessments but with overall rates less than 1.3%, will receive Tier 2 support. These

districts will be asked to review with the ISD the IEPs of students who have disability types, general educational instruction levels, or alternate assessment performance statuses that may not be compatible with a designation as a student with the most significant cognitive disability. For Tier 2 districts, flagged student cases will require a review and confirmation of appropriate, evidence-based diagnostic criteria used for determining whether the student meets all four criteria for the appropriate use of alternate standards in assessments and instruction. This includes three criteria for accurately identifying students with the most significant cognitive disability (substantial intellectual impairment, substantial impairment in adaptive functioning, and extensive support needs) and includes a 4th criterion that the student is also receiving a majority of instruction and summative curriculum based on alternate content expectations. Staff and parents will review the rubric to help interpret criterion-relevant data to determine if each criterion is met. When all criteria are met, the student is eligible for MI-Access. When any one of the criteria is not met, the students may not take MI-Access.

Furthermore, Tier 2 districts will have to conduct an educational benefit review for all students who continue to meet all four criteria, but are surpassing the alternate standards, to help ensure that high expectations and rigorous instruction are equitably made available for all students with disabilities. The results of the educational benefit review will need to be reviewed by the ISD for approval. Lastly, for districts in this tier, a standard parent information and consent form about the use of alternate standards and assessments will need to be developed and used in future IEP planning meetings.

Districts with either alternate assessment rates of 2% or higher, or who have both disproportionately over-assigned a demographic subgroup of students to alternate assessments and have overall alternate assessment rates greater than 1.2%, will receive Tier 3 support. These districts will be asked to review with the ISD the IEPs of students who have disability types, general educational instruction levels, or alternate assessment performance statuses that may not be compatible with a designation as a student with the most significant disability. Districts in this tier must review flagged student cases using the Rubric for Assigning Students to Alternate Standards for instruction and assessment along with criterion-relevant data. Districts will be required to attend a meeting, led by MDE staff, focusing on appropriately identifying students who meet the definition of most significant cognitive disability. Districts will be required to review their flagged student cases and will be given an opportunity to apply the rubric to one or more. For all flagged student cases from Tier 3 districts, a summary of this review will be turned into MDE to provide directed feedback. When all four criteria are met, the student is eligible for MI-Access. When any one of the criteria is not met, the student may not take MI-Access. Additionally, districts will have to conduct an educational benefit review for all students who continue to meet all four criteria, but are surpassing the alternate standards, to help ensure that high expectations and rigorous instruction are equitably made available for all students with disabilities. The results of the educational benefit review will need to be submitted to MDE for review. Lastly, for districts in this tier, a standard

parent information and consent form about the use of alternate content expectations and assessments will need to be developed and used in future IEP planning meetings.

Timeline

- Tier 1 districts will review their justification forms and provide general guidance for training and requirements by the end of March 2026.
- Tier 2 districts in October 2025 began reviewing flagged student cases and began reviewing the student's IEP records using the rubric. Summaries must be shared with the ISD for eight cases from up to four districts by April 1, 2026. Flagged student cases must be reviewed and approved by the ISD.
- Tier 3 districts will review flagged student cases beginning in October 2025 and must review the student's IEP records using the rubric. Summaries must be shared with MDE for eight cases from up to four districts per ISD, by April 1, 2026. If a Tier 3 district has fewer than eight flagged cases, then all available cases must be reviewed and summarized. MDE will provide directed feedback by the end of May 2026, and all remaining flagged cases will be reviewed, with summaries submitted to MDE by the end of June 2026. MDE will provide directed guidance to the ISD on these remaining cases by the end of August 2026.

MDE believes the steps taken with the implementation of our plan in the past two to three years have resulted in the reduction in participation we experienced in 2025. MDE is confident that the refinement of that plan will continue that trend in the coming year and beyond.

Sincerely,

/s/

Glenn M. Maleyko, Ph.D.
State Superintendent

Links regarding public comment:

[Public Comment Notice Memo 2024 Alternate Assessment One % Cap Waiver Request, November 21, 2024](#)

[Spotlight on Student Assessment Announcement for Public Comment on the Waiver, Pg 12, December 5, 2024](#)