



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

February 26, 2026

The Honorable Lindel Fields
Superintendent of Public Instruction
Oklahoma State Department of Education
2500 North Lincoln Boulevard
Oklahoma City, OK 73105-4599

Dear Superintendent Fields:

I am writing in response to the Oklahoma State Department of Education's (OSDE's) request on December 22, 2025, 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). Oklahoma requested this waiver extension because, based on State data for school year (SY) 2024-2025, OSDE 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 OSDE's waiver extension request, I am granting, pursuant to my authority under section 8401(b) of the ESEA, for school year 2025-2026, a one-year extension of the waiver of section 1111(b)(2)(D)(i)(I) of the ESEA so that the State may assess more than 1.0 percent of the total number of students in the State who are assessed in R/LA, mathematics and science using an AA-AAAS.

As part of this waiver extension, OSDE 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.
- 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 OSDE's waiver extension request, system improvements and will monitor future administrations of the AA-AAAS to avoid exceeding the 1.0 percent cap.

400 MARYLAND AVE., SW, WASHINGTON, DC 20202
<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.

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 AAAAAS, provided that such information does not reveal personally identifiable information about an individual student. I also encourage you to publish your State's plan, timeline, and progress in reducing the percentage of students taking the AA-AAAS.

Given the workplan submitted by OSDE, I expect to continue to see positive results of this plan in the 2025-2026 school year and beyond. OSDE has reduced the number and percentage of students assessed on an AA-AAAS between the 2017-2018 and 2024-2025 school years. Thank you for your continued efforts in achieving such progress. Future requests for a waiver extension will continue to expect both continued progress implementing your plan and progress in reducing the current percentage of students taking the AA-AAAS in all tested subjects.

I appreciate your work to improve Oklahoma'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 and Secondary Education

cc: Catherine Boomer, OSDE Executive Director of Assessments



December 19, 2025

Oklahoma State Department of Education (OSDE)

Public Notice and Comment Period

Waiver Request Pursuant to 34 C.F.R. §200.6(c)(4)

The Every Student Succeeds Act (ESSA) amended a provision of Title 1 of the Elementary and Secondary Education Act of 1965 related to students participating in alternate assessments of each State Education Agency's (SEA's) statewide assessment. The ESSA requires SEAs to submit waiver requests to the U.S. Department of Education if they have more than 1.0 percent of their student testing population participating in the alternate assessment in any subject area. OSDE anticipates Oklahoma will exceed the 1.0 percent cap based on preliminary data.

Oklahoma was granted a waiver for the 2024-2025 school year. The Oklahoma State Department of Education (OSDE) is requesting from the Secretary for the United States Department of Education an extension of the waiver of the 1.0 percent cap in ESEA section 1111(b)(2)(D)(i)(I) on the number of students who participate in alternate assessments aligned with alternate academic achievement standards (AA-AAAS) for the 2025-2026 school year for subject areas math, ELA, and science.

Oklahoma LEAs best understand how to identify the most appropriate assessment for students with disabilities. Our LEAs submit Justification Statements, provide assurances from superintendents, and utilize OSDE-provided resources. OSDE-SES continues to address this area of need by providing supports and exploring new methods to reach the 1.0 percent cap.

OSDE sought comments on this waiver extension request. Any individual or organization was able to submit written comments on the proposed waiver pursuant to 34 C.F.R. §200.6(c)(4). OSDE provided statewide notice by sending a memo through the Special Education listserv and posting the waiver application on the Oklahoma State Department of Education, Special Education Services (OSDE-SES) webpage. Comments and questions were submitted to Sherri Coats, Program Director, Special Education Services, using the following email: abby.johnson@sde.ok.gov. Public comments were submitted no later than 5:00 pm Monday, December 1, 2025. Comments and Submission Form are included in Attachments 1 & 2. After receiving the public comments, OSDE reviewed the public comments and will use the comments to inform training about the 1.0% monitoring of districts moving forward.

Section 1: Waiver Request

Requirement 1 – (§200.6(c)(4)(i)): Submit the waiver request at least 90 days before the testing window starts for the relevant subject.

OSDE Response	Supporting Evidence
<p>OSDE-SES indicated the dates of its alternate assessment testing window and confirmed that the waiver request was being submitted 90 days prior to the beginning of the testing window.</p>	<p>The Oklahoma Alternate Assessment Program’s (OAAP) operational window is March 24, 2026, through May 14, 2026. OSDE will submit a waiver request to the U.S. Department of Education for the subject areas of math, ELA, and science prior to Wednesday, December 24, 2025.</p> <ul style="list-style-type: none"> • Date that is 90 days prior to the start date for the OAAP: December 24, 2025. • OAAP Year-End Operational Window (required) is March 24, 2026, through May 14, 2026. • Instructionally Embedded (IE) assessments are for instructional purposes and are optional for LEAs. The IE window is September 9, 2025, through February 20, 2026. • The OAAP testing schedule is disseminated through the Special Education Listserv and is posted to the OAAP webpage. • A memo detailing the testing schedule was sent to the LEAs through the Special Education Listserv on August 27, 2025. (see attachment 3)

Requirement 2 (A) - (§200.6(c)(4)(ii)(A)): Provide State-level data from the current or previous year that shows the number and percent in each subgroup who took the alternate assessment in the subject area.

2024-2025 Oklahoma Student Participation in ELA by Subgroup

Subgroup	Number participating in statewide assessment (ELA) 2025	Number participating in the OAAP (ELA) 2025	Percent participating in the OAAP (ELA) 2025
All students	351065	4777	1.36%
Black	26904	596	2.22%
White	153112	1957	1.28%
Hispanic	74370	973	1.31%
Economically disadvantaged	217878	3872	1.78%
English Learner	39166	580	1.48%
Homeless	9371	174	1.86%
Asian	8646	141	1.63%
Hawaiian/Pacific Islander	1705	36	2.11%
Two or More Races	49308	665	1.35%
American Indian/Alaskan Native	37018	428	1.16%
Male	180204	3166	1.76%
Female	170859	1630	0.95%

2024-2025 Oklahoma Student Participation in Math by Subgroup

Subgroup	Number participating in statewide assessment (Math) 2025	Number participating in the OAAP (Math) 2024	Percent participating in the OAAP (Math) 2024
All students	350870	4776	1.36%
Black	26888	596	2.22%
White	153018	1959	1.28%
Hispanic	74312	974	1.31%
Economically disadvantaged	217684	3872	1.78%
English Learner	39134	581	1.48%
Homeless	9352	174	1.86%
Asian	8648	141	1.63%
Hawaiian/Pacific Islander	1701	36	2.12%
Two or More Races	49302	663	1.34%
American Indian/Alaskan Native	36999	427	1.15%
Male	180086	3166	1.76%
Female	170782	1630	0.95%

2024-2025 Oklahoma Student Participation in Science by Subgroup

Subgroup	Number participating in statewide assessment (Science) 2025	Number participating in the OAAP (Science) 2025	Percent participating in the OAAP (Science) 2025
All students	150127	1925	1.28%
Black	11325	230	2.03%
White	66322	845	1.27%
Hispanic	31780	379	1.19%
Economically disadvantaged	90106	1548	1.72%
English Learner	15460	212	1.37%
Homeless	3869	72	1.86%
Asian	3608	52	1.44%
Hawaiian/Pacific Islander	678	14	2.06%
Two or More Races	20494	223	1.09%
American Indian/Alaskan Native	15919	187	1.17%
Male	76984	1250	1.62%
Female	73141	680	0.93%

Requirement 2 (B) - (§200.6(c)(4)(ii)(B)): Provide State-level data from the current or previous year on the overall assessment participation rate for all students and for students with disabilities.

Group	All Students Grades 3-8 and High School ELA	Students with Disabilities Grades 3-8 and High School ELA
Students Assessed	351065	68016
Students Enrolled	354926	69163
Assessment Participation Rate	98.91%	98.34%
Group	All Students Grades 3-8 and High School Math	Students with Disabilities Grades 3-8 and High School Math
Students Assessed	350870	67963
Students Enrolled	354841	69137
Assessment Participation Rate	98.88%	98.30%
Group	All Students Grades 3-8 and High School Science	Students with Disabilities Grades 3-8 and High School Science
Students Assessed	150127	27225
Students Enrolled	152786	27912
Assessment Participation Rate	98.26%	97.54%

Requirement 3 (A) – (§200.6(c)(4)(iii)(A)): Provide assurance that districts over 1.0 percent participation in the alternate assessment followed the state’s participation guidelines.

OSDE Response	Supporting Evidence
<p>OSDE-SES has assured that it has verified that each district with more than 1.0 percent participation in the OAAP followed the state’s guidelines for participation.</p>	<p>Each LEA that is over 1.0% provides a written assurance to address the following:</p> <ul style="list-style-type: none"> • IEP teams followed the state’s Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments • IEP teams are correctly identifying students with the most significant cognitive disabilities based on the evidence in the Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments • IEP teams are informing parents/guardians of the implications associated with their child being assessed on the alternate assessment (Parent Brochure) • IEP teams have completed the Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments in our online IEP platform. (see attachment 4) <p>Assurance statements regarding the responsibility of IEP teams to follow the AA-AAAS participation requirements are gathered annually from all LEA Superintendents as part of their Assurances and LEA Agreements prior to the start of each new fiscal year. LEAs must complete Assurances before they can submit their LEA agreement. OSDE makes no payments until assurances and agreements are approved. The OSDE-SES utilizes an online grants management system to gather the assurance statements. (See attachment 5)</p>

Requirement 3 (B) – (§200.6(c)(4)(iii)(B)): Provide assurance that any disproportionality in students taking the alternate assessment will be addressed.

OSDE Response	Supporting Evidence
<p>Oklahoma has assured that it has verified that each LEA with more than 1.0 percent participation in the OAAP will address any disproportionality in participation in the alternate assessment.</p>	<p>OSDE continues to address disproportionality in the percentage of students in any subgroup taking the alternate assessment through the steps addressed below:</p> <ul style="list-style-type: none"> • Calculating and analyzing participation rates among subgroups at the state and district levels; • Identifying subgroups over-represented in the DLM participation counts; • Reviewing district justifications and data to identify unusual patterns and high participation rates across subgroups; • Districts that fall into tiers 1 through 3 for the first time (explained in more detail in Requirement 4 [B]) will respond to additional questions addressing disproportionality when they complete their Toolkit. <p>The OSDE annually examines finalized state assessment participation data for disproportionality between the OAAP and OSTP student participation for subgroups listed in 2(A), as well as Native Americans and male students. The two additional subgroups were chosen due to having historically experienced disproportionality in Oklahoma. The disproportionality rate for OAAP participation is set at 3.0%. Districts are asked whether disproportionality exists in the <i>Justification for Exceeding 1.0 Percent OAAP Participation</i> survey.</p>

Requirement 4 (A) – (§200.6(c)(4)(iv)(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 school years.

OSDE Response	Supporting Evidence
<p>Oklahoma includes the following plan and timeline for improving its guidelines, including its definition of students with the most significant cognitive disabilities.</p>	<p>The OSDE-SES worked in conjunction with three groups of stakeholders during the 2017-18 school year to develop a state definition of “students with the most significant cognitive disabilities.” The definition has been included in the required professional development module regarding the Oklahoma Alternate Assessment Program (OAAP) participation criteria. This module is available in the statewide online IEP system. In addition, LEAs may access the State definition on the OSDE-SES website by going to special education, then assessment. (see attachment 6)</p> <p>2024-2025 Plan and Timeline for Improving Our Participation Guidelines:</p> <ul style="list-style-type: none"> • Our OAAP Program Manager participates in the bi-monthly NCEO 1.0% calls to increase knowledge on how to move Oklahoma forward in lowering our percentage. • Spring 2024 began the implementation of a state-defined alternate diploma in compliance with ESSA requirements.

- The 2024 [Special Education Services Policies and Procedures Manual](#) provided IEP Teams with guidance on the alternate diploma pathway for students receiving instruction on alternate academic achievement standards and participating in the OAAP.
- The [OAAP Parent Brochure](#) has been updated to reflect the shift from a standard diploma to an alternate diploma for students participating in the alternate assessment.
- A bi-monthly OAAP Memo is sent out via listserv and posted on the electronic IEP system homepage under the SES Info Hub tab to inform district test coordinators, special education directors, and teachers of any relevant information and upcoming training related to students with the most significant cognitive disabilities.
- OSDE requires all new test administrators for the alternate assessment to complete a module provided by our testing vendor, DLM, titled “Who are Students with the Most Significant Cognitive Disabilities?”. This module focuses on the characteristics that distinguish students with significant cognitive disabilities who take an alternate assessment based on alternate achievement standards from other students with disabilities.

- The transition to a state-defined alternate diploma and roll out of a tiered monitoring process have presented valuable learning opportunities for our LEAs. As a result of these initiatives, we have observed a continued decline in our OAAP data. OSDE will reevaluate our implementation plan following the 2024-2025 school year to ensure we continue to make progress toward being under 1 percent.
- October 2024: During the state-wide bi-weekly Special Education Directors call, the SDE reviewed progress in reducing alternate assessment participation over time and emphasized the importance of responding to the public comment period.

2025-2026 Plan and Timeline for Improving Our Participation Guidelines:

- The 2024 [Special Education Services Policies and Procedures Manual](#) provides IEP Teams with guidance on the alternate diploma pathway for students receiving instruction on alternate academic achievement standards and participating in the OAAP.
- The [OAAP Parent Brochure](#) has been updated to reflect the shift from a standard diploma to an alternate diploma for students participating in the alternate assessment.
- The Special Education Criteria Checklist has a new required parental consent to participate in the alternate assessment in alignment with Oklahoma Statute and 34 C.F.R. § 300.9(a)(1) The parent

understands that the granting of consent is voluntary on the part of the parent and may be revoked at any time. (see attachment 4)

- A bimonthly OAAP Memo is sent out via listserv and posted on the electronic IEP system homepage under the SES Info Hub tab to inform district test coordinators, special education directors, and teachers of any relevant information and upcoming training related to students with the most significant cognitive disabilities.
- OSDE requires all new test administrators for the alternate assessment to complete a module provided by our testing vendor, DLM, titled “Who are Students with the Most Significant Cognitive Disabilities?”. This module focuses on the characteristics that distinguish students with significant cognitive disabilities who take an alternate assessment based on alternate achievement standards from other students with disabilities.
- The Oklahoma state-defined alternate diploma and the rollout of a tiered monitoring process, along with the review of the student confidential records (issuance of noncompliance reports with corrective action plans for all tiers), have presented valuable learning opportunities for our LEAs. OSDE will reevaluate our implementation plan following the 2025-2026 school year to ensure we continue to make progress toward being under 1 percent.

Requirement 4 (B) – (§200.6(c)(4)(iv)(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 1.0 percent with the alternate assessment.

OSDE Response	Supporting Evidence
<p>Oklahoma provided a plan and timeline for additional steps it will take to support and provide appropriate oversight of districts expected to assess more than 1.0 percent.</p>	<p>LEAs anticipating exceeding the 1.0 percent cap are annually required to complete the online survey <i>Justification for Exceeding 1.0 Percent OAAP Participation</i> (see attachment 7). The survey is disseminated by the Office of Special Education Services and the Office of Assessments. The survey addresses an LEA’s projected AA-AAAS participation percentage, the previous year’s AA-AAAS disproportionality information, and best practices for determining the appropriate year-end assessment for students with disabilities. The survey closes three weeks prior to the opening of the OAAP operational window. The results of the most recent survey, based on anticipated data, are available on the OAAP webpage.</p> <ul style="list-style-type: none"> • 2024-2025: The Special Education Office and the Office of Assessment identified the need to monitor a sampling of 2-3 files for each LEA that has exceeded the 1% cap. The OSDE then issued a report of the findings with corrective action plans (CAP). The LEAs then worked to ensure the student-level files that were identified were all brought into compliance with IDEA and the OSDE-SES expectation of students participating in the alternate assessment. The LEAs then were required to apply this standard to all files not in the sample to achieve systemic compliance.

The requirements for LEAs to complete at each tier are listed below.

Tier 1:

- The special education director will participate in the virtual training provided by the OSDE-SES. The presentation materials will be provided to the district special education director for staff training.
- Submit an assurance statement ensuring the LEA follows State guidelines when identifying students eligible for the alternate assessment.
- OSDE-SES will audit district student-level files for students identified as receiving instruction through the alternate academic achievement standards. A report of the findings will be provided to the district. The district will make the required corrections to ensure the student is on the appropriate academic path. (see attachment 8)

Tier 2:

- The special education director will participate in the virtual training provided by the OSDE-SES. The presentation materials will be provided to the district special education director for staff training.
- Complete the OAAP Toolkit to assist the district in identifying the root cause of the high percentage of students participating in the alternate assessment. The district will also develop a plan for improvement and the special education director's plan for monitoring files for appropriate documentation for participation in the alternate assessment. (see attachment 9)
- OSDE-SES will audit district student-level files for students identified as receiving instruction through

the alternate academic achievement standards. A report of the findings will be provided to the district. The district will make the required corrections to ensure the student is on the appropriate academic path. (see attachment 8)

Tier 3:

- The special education director will participate in the virtual training provided by the OSDE-SES. The presentation materials will be provided to the district special education director for staff training.
- Complete the OAAP Toolkit to assist the district in identifying the root cause of the high percentage of students participating in the alternate assessment. The district will also develop a plan for improvement and the special education director's plan for monitoring files for appropriate documentation for participation in the alternate assessment. (see attachment 9)
- The LEA will conduct self-monitoring twice during the school year and submit the findings to the OSDE-SES. The self-monitoring will detail the findings, steps taken to correct noncompliance, and continued monitoring of district files.
- OSDE-SES will audit district student-level files for students identified as receiving instruction through the alternate academic achievement standards. A report of the findings will be provided to the district. The district will make the required corrections to ensure the student is on the appropriate academic path. (see attachment 8)

Requirement 4 (C) – (§200.6(c)(4)(iv)(C)): Submit a plan and timeline by which the State will address any disproportionality in the percentage of students taking the alternate assessment.

OSDE Response	Supporting Evidence
<p>Oklahoma provided a plan and timeline for addressing any disproportionality.</p>	<p>All LEAs anticipating exceeding the 1.0 percent cap are required to complete the <i>Justification for Exceeding 1.0 Percent OAAP Participation</i> survey. Secondly, after the year-end assessment data is finalized, OSDE-SES analyzes all LEAs for a discrepancy in disproportionality.</p> <ul style="list-style-type: none"> • Districts will be notified if disproportionality exists in their district. (see attachment 7) • Districts will be asked to reflect on their disproportionality by answering the following questions: <ul style="list-style-type: none"> -What subgroups in your district have the largest discrepancy between participants of the general assessment and the alternate assessment? -When looking at subgroup discrepancies, what hypotheses can be found? -What problem-solving actions will the district take to address the identified hypotheses? <p>OSDE will provide training, if requested, to assist the districts in identifying the cause of the disproportionality and addressing the cause.</p>

Requirement 5 – (§200.6(c)(4)(v)): Demonstrate substantial progress toward each component of the prior year’s plan and timeline, which was required under Requirement 4 (C).

School Year	State Total	Subject	OAAP Student Count	Total Students Tested	OAAP Percentage
2025	State Total	Math	4776	350870	1.36%
2025	State Total	Reading	4777	351065	1.36%
2025	State Total	Science	1925	150127	1.28%
2024	State Total	Math	4734	350281	1.35%
2024	State Total	Reading	4734	350598	1.35%
2024	State Total	Science	1945	150150	1.30%
2023	State Total	Math	5059	349624	1.45%
2023	State Total	Reading	5062	349916	1.45%
2023	State Total	Science	2054	148707	1.38%
2022	State Total	Math	5248	355523	1.48%
2022	State Total	Reading	5250	355551	1.48%
2022	State Total	Science	2146	150176	1.43%
2021	State Total	Math	5095	326829	1.56%

2021	State Total	Reading	5097	327355	1.56%
2021	State Total	Science	2114	137639	1.54%
2020	State Total	Math	N/A	N/A	N/A
2020	State Total	Reading	N/A	N/A	N/A
2020	State Total	Science	N/A	N/A	N/A
2019	State Total	Math	5779	350827	1.65%
2019	State Total	Reading	5797	351088	1.65%
2019	State Total	Science	2336	144474	1.62%
2018	State Total	Math	5747	345792	1.66%
2018	State Total	Reading	5759	345476	1.67%
2018	State Total	Science	2293	144879	1.58%
2017	State Total	Math	5840	346763	1.68%
2017	State Total	Reading	5852	346316	1.69%
2017	State Total	Science	2167	128009	1.69%

OSDE Response	Supporting Evidence
<p>Oklahoma demonstrated some progress toward its prior year’s plan and timeline and has made revisions to the plan to ensure substantial progress in subsequent years.</p>	<p>OSDE saw a reduction in the number of students participating in the alternate assessment in science for the third year in a row, reducing the participation rate from 1.30% to 1.28%. This represents 221 fewer students participating in the alternate assessment in science since 2022.</p> <p>Oklahoma’s overall OAAP participation trajectory has been downward since 2017 from 1.68% and 1.69% participation rates in math and reading respectively to the 2025 rates of 1.36% in math and reading. While Oklahoma experienced a slight uptick in 2025 alternate assessment participation rates with reading and math increasing .01%, this change is not statistically significant.</p> <p>The 2025 Oklahoma legislative session produced a change that now requires signed parental consent for an eligible student to participate in the OAAP. As demonstrated by the revised OAAP checklist (see Attachment 4), a parent must provide signed consent to participate in the alternate assessment. This requirement has spurred deeper conversations as IEP teams are making determinations that a student will or will not participate in the alternate assessment. It is anticipated that more thoughtful dialogue will minimize the number of students who have been inappropriately identified for participation in the alternate assessment.</p> <p>Oklahoma remains committed to decreasing participation rates in 2026 and beyond. As evidenced by the revised plan submitted in requirement 4, Oklahoma will work with districts in a more targeted way to ensure IEP teams are appropriately identifying students who will participate in the alternate assessment and assisting LEA administrators in self-monitoring and ensuring only students who meet participation requirements are identified for participation in the alternate assessments. OSDE will be providing the professional development to ensure the districts have a strong understanding of the appropriate student population for participation in the alternate assessment.</p>

Attachments

	A	B	C	E	F	G	H	I
1	Timestamp	Email Address	First and Last Name	Please select your role.*	Please list the district you work for or are involved with,	What suggestions would you like to share with OSDE to assist IEP teams with the decision to place a student on alternate assessment?	Do you have any comments, questions, or concerns about the monitoring process explained in the waiver for districts that are over 1%? Do you have any comments, questions, or concerns about the monitoring process explained in the waiver for districts that are over 1%?	Please list any other comments, questions, or concerns you have regarding the plan of improvement addressed in the waiver.
2	10/31/2025 17:41:00	jmunderhill@checotah.k12.ok.us	Janie Underhill	School district employee	Checotah	I would suggest that OSDE consider providing IEP teams with greater flexibility within the criteria for determining eligibility for alternate assessment. In particular, some students, especially in the lower grades, may not fully meet the established cognitive and adaptive criteria but still experience significant challenges that make participation in standardized assessments extremely difficult. These challenges can include sensory sensitivities, communication barriers, or emotional and behavioral dysregulation that arise during testing situations. Allowing a bit more "wiggle room" within the decision-making framework would help teams make more individualized determinations that account for the whole child and ensure that assessment methods are both appropriate and equitable.	No.	None.
3	11/2/2025 10:02:29	nknotts@cleora.net	Nicole Knotts	School district employee	Cleora	As a small district, we will always be monitored since even having one child on the OAAP will put us over the threshold. We know that we have the same students year after year. We end up spending many hours completing the monitoring process each year when our time could be better spent educating these students.	No	An exemption would seem appropriate for those small districts that have followed the rubrics, appropriately identified students who require the OAAP, and have those same students year after year. We have done our monitoring, plans of improvement, and due diligence, so there seems to be no need to repeat this process over and over.
4	11/3/2025 9:46:26	krichardson@reydon.k12.ok.us	Keisha Richardson	School district employee	Reydon Public Schools	Offer virtual or regional "file review workshops" where teams analyze anonymized IEPs using the OAAP Rubric for Determining Eligibility to increase consistent decision-making across districts.	I appreciate the tiered monitoring system and corrective action plans for districts over 1%. However, clearer timelines, examples of compliant IEP documentation, and more supportive follow-up would help districts improve practices. Small districts especially need flexibility and clearer expectations for what applies to them. Providing districts with comparison data and feedback would make the process more transparent and meaningful.	N/A
5	11/3/2025 13:43:12	czimmerman@apacheps.org	Carolyn Zimmerman	School district employee	Boone-Apache Public Schools		I do not	
6	11/4/2025 9:01:58	cbames@thomas.k12.ok.us	Crystal Bames	School district employee	Thomas-Fay-Custer Unified Schools	The cap should be removed.	Schools should not be penalized because a student has a disability. There should not be a cap in place. In smaller school districts, it's possible to have several students in one grade who require OAAP testing, and then go several years without any students who need it.	
7	11/4/2025 11:43:11	mwilliams@crescentok.com	Monica Williams	School district employee	Crescent	I feel teams should consider the child's disability along with their instructional level. I believe that IQ should also be a factor when considering alternate assessment for kids who are struggling.	The monitoring process will be difficult to complete as the information that was used to determine if a student requires alternate assessment will not change from year to year. I believe that when determining if a student qualifies for alternate assessment initially, teams will have used the proper placement guidelines. As long as teams use professional development and toolkits that are designed to support IEP teams in making appropriate and legally compliant decisions, monitoring tools should result in the same decision they made when initially placing the student.	In our small, rural school district, we rarely go over the 1%. We have other students in our district that we feel could be placed on alternative assessments but reserve the placement for our more severe population

10/31/25, 12:50 PM

Public Comment Feedback Form for the 25-26 1% Extension Waiver Request

Public Comment Feedback Form for the 25-26 1% Extension Waiver Request

The Every Student Succeeds Act (ESSA) requires states to apply for a waiver if they assess more than 1% of their testing population with the alternate assessment. One of the requirements of the waiver states the waiver must be posted for public comment.

The draft waiver extension request is available for public comment from **November 1 - December 1, 2025**. The waiver can be accessed using the following link: will insert when posted

Please complete this form to share any comments, concerns, or questions you may have regarding Oklahoma's plan to address our alternate assessment participation rates.

We appreciate you taking the time to provide constructive feedback.

* Indicates required question

1. Email *

2. First and Last Name *

3. Email Address

4. Please select your role.* *

Mark only one oval.

School district employee

Parent

Community Member

5. Please list the district you work for or are involved with. *

6. What suggestions would you like to share with OSDE to assist IEP teams with the decision to place a student on alternate assessment?

7. Do you have any comments, questions, or concerns about the monitoring process explained in the waiver for districts that are over 1%? Do you have any comments, questions, or concerns about the monitoring process explained in the waiver for districts that are over 1%?

10/31/25, 12:50 PM

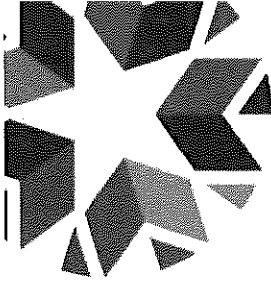
Public Comment Feedback Form for the 25-26 1% Extension Waiver Request

8. Please list any other comments, questions, or concerns you have regarding the plan of improvement addressed in the waiver.

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Google Forms



TESTING WINDOW

2025-2026

ACT[®] WINDOW 1
 MARCH 24-27; MARCH 30 - APRIL 3
STANDARD ONLINE

WINDOW 2
 APRIL 7-10; APRIL 13-17

WINDOW 3
 APRIL 21-24; APRIL 27-MAY 1
 (MAKE-UP TESTING ONLY)

cognia ONLINE
 APRIL 1 - APRIL 30

GRADE 11 CCRA SCIENCE & US HISTORY PAPER
 APRIL 1 - APRIL 10

cognia ONLINE
 APRIL 13 - MAY 13

GRADES 3-8 ELA & MATH GRADES 5 & 8 SCIENCE PAPER
 APRIL 13 - APRIL 30

WIDA[™] UNIVERSITY OF WISCONSIN-WATSON
WIDA ACCESS ASSESSMENTS
 WIDA ACCESS JANUARY 5 - MARCH 20
WIDA ACCESS

NAEP NATIONAL ASSESSMENT OF EDUCATIONAL PROGRESS
ONLINE
 JANUARY 26 - MARCH 20

DYNAMIC[™] LEARNING MAPS
OAAP/DLM
 ALL GRADES & CONTENT AREAS
 MARCH 24 - MAY 14

CRITERIA CHECKLIST FOR ASSESSING STUDENTS WITH DISABILITIES ON ALTERNATE ASSESSMENTS

OK IEP

Date this IEP Begins: _____ Date this IEP Ends: _____

Name of Student: _____ District/Agency: _____

Student Testing Number (STN): _____

The Oklahoma Alternate Assessment Program (“OAAP”) is the statewide assessment program developed for the benefit of students with the **most significant cognitive disabilities, including, without limitation, significant adaptive behavior deficits**. Due to the severity of such cognitive disabilities, alternate academic achievement standards are required in daily instruction as well as statewide assessment for students participating in the OAAP. In addition, performance expectations aligned with the statewide general assessment under the Oklahoma School Testing Program (“OSTP”) may not be appropriate even with accommodation(s). Assessment decisions are made on an annual basis by the Individualized Education Program (“IEP”) team, and a student must meet certain criteria to be eligible for an alternate assessment. **Students who do NOT meet the eligibility criteria provided below MAY NOT participate in the OAAP, but instead will participate in statewide general assessment, the OSTP.**

OAAP PARTICIPATION CRITERIA CHECKLIST	YES	NO
Does the student have significant intellectual disabilities AND significant adaptive behavior deficits?	<input type="checkbox"/>	<input type="checkbox"/>
Does the student’s IEP require alternate achievement standards in ALL content areas?	<input type="checkbox"/>	<input type="checkbox"/>
Does the IEP team believe extensive family/community support(s) will be a lifelong requirement , regardless of modifications, accommodations, or adaptations implemented in the student’s program?	<input type="checkbox"/>	<input type="checkbox"/>
Does the student require intensive and extensive direct instruction in multiple settings to acquire, maintain, generalize, and demonstrate knowledge of skills?	<input type="checkbox"/>	<input type="checkbox"/>
The decision to place the student on an alternate assessment is based on the student’s disability and NOT on excessive absences, language, social, cultural, or economic differences OR administration reasons such as the student is expected to perform poorly on the regular assessment, the student displays disruptive behaviors, or the student experiences emotional distress during testing.	<input type="checkbox"/>	<input type="checkbox"/>

If the answer to **ANY** of the questions above is “NO,” the student must participate in the regular assessment through the OSTP, with or without accommodations. If **ALL** of the answers to the questions above are “YES”, the student is eligible to participate in an alternate assessment through the OAAP.

The parent **MUST** consent for the student to participate in the OAAP. Refusal of parental consent means that the student will be assessed using the regular district and state assessments with appropriate accommodation(s), modifications, and supplementary aids and services, and that the student will be taught to the general education standards and not to the alternate academic achievement standards.

Does Consent (I understand my child will participate in the OAAP) _____ Date: _____
*Parent/Guardian Signature

Does **NOT** Consent (I understand my child will **NOT** participate in the OAAP) _____ Date: _____
**Parent/Guardian Signature

*Pursuant to 34 C.F.R. § 300.9(a)(1) “The parent understands that the **granting of consent is voluntary** on the part of the parent and may be revoked at any time.”

By **refusing consent for my child to participate in the OAAP, I understand my child will participate in the OSTP assessment and be taught to general education standards and will not be taught to alternate standards.



Applicant: 2025-2026 LEA Agreement - 00-
 Application: Original Application
 Cycle: 6/30/2025
 Application Due Date:

Project Period: 7/1/2025 - 6/30/2026

LEA Friendly!
 Click to Return to Optimization Select
 Click to Return to GMS Access/Select Page
 Click to Return to Menu List in On

The application has been submitted. No more updates will be saved for the application.

Overview	General Information	Consent/Agreement	Maintenance of Effort	Agreement	Other	Timeline	Resources	Disability	CEPA	Submittal	Accession/Print
FAPE Part 1	FAPE Part 1	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement
FAPE Part 2	FAPE Part 2	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement	Agreement

Participation in Assessments

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

The LEA assures that it will include students with disabilities in state/districtwide assessments, with appropriate accommodations, as indicated in the student's IEPs, in accordance with 34 CFR § 300.160 and the "Special Education Policies". Students who, even with appropriate accommodations, cannot participate in state/districtwide assessments will participate in the State's alternate assessments. The LEA will establish and implement guidelines for the participation of students with disabilities in districtwide assessments, with appropriate accommodations in administration, if necessary. These guidelines will also address participation of students with disabilities in alternate assessments for those students who cannot participate, even with appropriate accommodations, in standard districtwide assessment programs. The school district assures that only those students who meet the participation criteria identified in the Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments will participate in the Oklahoma Alternate Assessment Program. The school district also assures that IEP teams will complete the Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments on an annual basis prior to student participation in the alternate assessment.

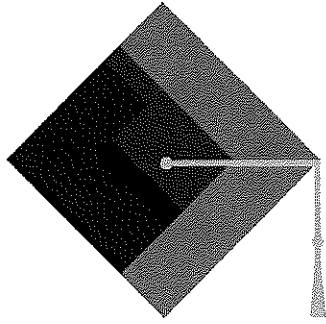
34 CFR § 300.160 Participation in Assessments.

- (A) General A State must ensure that all children with disabilities are included in all general State and district-wide assessment programs, including assessments described under section 1111 of the ESEA, 20 U.S.C. 6311, with appropriate accommodations and alternate assessments, if necessary, as indicated in the respective IBPs.
- (B) Accommodation guidelines-
 - (1) A State (or, in the case of a district-wide assessment, an LEA) must develop guidelines for the provision of appropriate accommodations.
 - (2) The State's (or, in the case of a district-wide assessment, the LEA's) guidelines must-
 - (i) Identify only those accommodations for each assessment that do not invalidate the score; and
 - (C) Alternate assessments.

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

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

- (i) Are aligned with the State's challenging academic content standards and challenging student academic achievement standards;
 - (ii) If the State has adopted modified achievement standards permitted in 34 CFR 200.1(e), measure the achievement of children with disabilities meeting the State's criteria under § 200.1(e)(2) against those standards; and
 - (iii) If the State has adopted alternate academic achievement standards permitted in 34 CFR 200.1(d), measure the achievement of children with the most significant cognitive disabilities against those standards.
- (D) Explanation to IEP Teams. A State (or in the case of a district-wide assessment, an LEA) must provide IEP Teams with a clear explanation of the differences between assessments based on grade-level academic achievement standards and those based on modified or alternate academic achievement standards, including any effects of State and local policies on the student's education resulting from taking an alternate assessment based on alternate academic achievement standards (such as whether only satisfactory performance on a regular assessment would qualify a student for a regular high school diploma).
- (E) Inform parents. A State (or in the case of a district-wide assessment, an LEA) must ensure that parents of students selected to be assessed based on alternate academic achievement standards are informed that their child's achievement will be measured based on alternate academic achievement standards.
- (F) Reports. An SEA (or, in the case of a district-wide assessment, an LEA) must make available to the public, and report to the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children, the following:
- (1) The number of children with disabilities participating in regular assessments, and the number of those children who were provided accommodations (that did not result in an invalid score) in order to participate in those assessments—
 - (2) The number of children with disabilities, if any, participating in alternate assessments based on grade-level academic achievement standards.
 - (3) The number of children with disabilities, if any, participating in alternate assessments based on modified academic achievement standards.
 - (4) The number of children with disabilities, if any, participating in alternate assessments based on alternate academic achievement standards.
- Compared with the achievement of all children, including children with disabilities, the performance results of children with disabilities on regular assessments, alternate assessments based on grade-level academic achievement standards, alternate assessments based on modified academic achievement standards, and alternate assessments based on alternate academic achievement standards if—
- (i) The number of children participating in those assessments is sufficient to yield statistically reliable information; and
 - (ii) Reporting that information will not reveal personally identifiable information about an individual student on those assessments.
- (G) Universal design. An SEA (or, in the case of a district-wide assessment, an LEA) must, to extent possible, use universal design principles in developing and administering any assessments under this section. (Authority: 20 U.S.C. 1412(a)(16))



**OKLAHOMA STATE DEPARTMENT OF
EDUCATION**
CHAMPION EXCELLENCE

State Definition of “students with the most significant cognitive disabilities” 34 CFR § 200.6(d)(1)

Students with the most significant cognitive disabilities have limited conceptual skills, written language skills, and understanding of numerical concepts such as quantity, time, and money. Vocabulary and grammar are quite limited and augmentative communication devices are often necessary to communicate with others. They tend to focus on present, everyday events and rarely attempt to analyze or expand on new ideas and concepts through spoken language. Skill acquisition and measurable gains on grade-level alternate academic achievement standards require extensive, direct individualized instruction. These students require substantial supports for all activities of daily living including meal preparation, dressing, grooming, and personal hygiene. Their personal safety is dependent upon constant supervision and will be a concern throughout their lifetime.

2025-2026 Justification for Exceeding 1.0 Percent OAAP Participation Survey

The Every Student Succeeds Act (ESSA) requires Oklahoma to ensure the number of students assessed with the OAAP in English Language Arts, Math, and Science does not exceed 1.0 percent of the statewide student testing population. If your district is anticipating more than 1.0 percent of your testing population will participate in the OAAP for the 2026 spring operational window, please complete the following survey by **March 2, 2026**.

Please allow yourself enough time to complete the online survey in one sitting. The survey is scheduled to expire after the due date.

For questions related to the survey, please email assessments@sde.ok.gov.

* Indicates required question

1. Email *

.....

2. District Name *

.....

3. Director of Special Education *

.....

4. Email Address *

.....

- 5. District Level Data: English Language Arts and Math. Enter the projected OAAP participation in ELA and Math for the 2024-2025 school year. *
Formula: $\text{OAAP Student Testing Population} / \text{Total Testing Population (Total Students Tested Grades 3-8, 11)} = N$; $N \times 100 = \% \text{ of OAAP Assessments}$

- 6. Describe how all members of the IEP teams have been informed and trained on the use of the OAAP participation guidelines found in The Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments to make participation decisions? *

- 7. Does the district provide a targeted program that may contribute to a higher enrollment of students with the most significant cognitive disabilities? *

If yes, explain your answer below.

8. Does the district have a small overall student population that increased the likelihood of exceeding the 1.0 percent threshold?

If yes, please explain your answer below.

9. What data sources are used to determine eligibility for students participating in the alternate assessment? *

10. Describe the process for auditing the IEPs for students in your district that participate in the alternate assessment. *

11. Disproportionality:

What subgroups in your district have the largest discrepancy between participants of the general assessment and the alternate assessment?

When looking at subgroup discrepancies, what hypotheses can be formed?

What problem-solving actions will the district take to address the identified hypotheses?

12. Parent/Guardian Participation:

*

How are parents or guardians informed annually regarding the decision to place a student on alternate assessment and the postsecondary implications associated with earning an alternate diploma?

13. What resources and technical assistance does the district need from SDE to ensure students are being assessed using the appropriate assessment?

*



OKLAHOMA STATE
DEPARTMENT *of* EDUCATION

March 11, 2024

Public School
Superintendent

Dear Superintendent

The Every Student Succeeds Act (ESSA) places a statewide 1.0 percent participation cap on students participating in an alternative assessment based on alternate academic achievement standards (AA-AAAS). As a result of the State of Oklahoma exceeding this cap for the 2023-2024 school year, the United States Department of Education granted the Oklahoma State Department of Education's Special Education Services (OSDE-SES) a waiver. As part of the waiver requirements, the OSDE must submit a plan and timelines by which the OSDE will take additional steps to support and provide appropriate oversight to each LEA that anticipates assessing more than 1.0 percent with the alternate assessment as required by 34 CFR 200.6(c)(4)(iv)(B).

The Oklahoma State Department of Education (OSDE), Office of Special Education Services (SES) has an obligation under 34 CFR § 300.600 to provide general supervision to ensure districts are appropriately implementing the IDEA. In the 2023-2024 school year, your district assessed more than the 1.0 percent of the district's students using the alternate assessment. As a result, on January 31, 2025, your district was notified that the OSDE-SES would complete a compliance audit of student files and follow up with any findings.

The compliance audit consisted of student-level file reviews of students identified as participating in an alternative assessment. We reviewed the Multidisciplinary Evaluations and Eligibility Group Summary (MEEGS) and the Individualized Education Program (IEP) to determine if team decisions are documented appropriately and supported with data. Below you will find the findings of the review and directives, if any, to bring the files into compliance as well as to review any additional student records that were not selected for the audit to ensure compliance.

DISCUSSION:

Students with disabilities on an Individualized Education Program (IEP) must be included in all state and district-wide assessments. The IEP team determines annually, within the parameters of IDEA and Oklahoma's Policy and Procedures (2024) manual, how the student will participate in state and district-wide assessments—with or without accommodations or through the alternate assessment.

The Oklahoma Alternate Assessment Program (OAAP) is a component of the Oklahoma School Testing Program (OSTP) and is designed for students with the most significant cognitive disabilities. The OAAP mirrors the general assessment system in regards to grade levels and subjects assessed and utilizes the Dynamic Learning Maps (DLM) Alternate Assessment System to measure academic content knowledge of students with significant cognitive disabilities. The academic achievement of students participating in the OAAP is measured against alternate achievement standards, which differ in complexity from the achievement standards of the general state assessments. In order to participate in the OAAP, students must be instructed in alternate achievement standards in all content areas and must have an IEP containing rigorous, measurable goals that include short-term benchmarks/objectives. In addition, students must meet the criteria identified in The Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments and the IEP team must determine an alternate assessment is appropriate for the student. The Every Student Succeeds Act (ESSA) mandates, as a state, that no more than 1% of all tested students may participate in an alternate assessment. IEP teams are responsible for making this determination on a case-by-case basis based on data and the need for significant lifelong supports. All teams should consider whether students can participate in the general assessment with accommodations prior to considering eligibility in the alternate assessment.

To qualify for alternate assessment, the student must have significant deficits in general intellectual functioning, existing concurrently with significant deficits in adaptive behavior and manifested during the developmental period that adversely affects a child's educational performance. To qualify for the alternate assessment, the current MEEGS must document the following:

- Deficits in intellectual functioning, as measured by a standardized norm-referenced cognitive assessment. Specifically, the student achieves a standard score of two or more standard deviations below the mean on a measure of general IQ.
- The overall adaptive behavior score must fall at least two or more standard deviations below the mean on a norm-referenced measure. NOTE: If there are discrepancies in the rating scale results from home and school, the team should consider including an observation by a qualified professional to provide additional information about the student's independent adaptive functioning within the school and community environments. Also, the team should take into consideration the global scores of the other components measured (e.g., cognitive, academic achievement, etc.) as a systematic approach to determining if one of the rating results is an outlier of the overall evaluation results.

Below you will find information and resources to facilitate greater understanding of the alternative assessment qualifications.

Oklahoma Special Education Policy & Procedures Manual (2024) - Page 210 required two objectives, page 221-230 for alternative assessment requirements.

Guidance Rubric for Considering Student Eligibility for the Oklahoma Alternate Assessment Program (OAAP)

2024-2025 OAAP Handbook

OSDSE-SES Alternate Assessment webpage

FINDINGS OF NONCOMPLIANCE REQUIRING CORRECTIVE ACTIONS AND IMPROVEMENTS:

1) Areas of Noncompliance: Multidisciplinary Evaluation and Eligibility Group Summary (MEEGS) components

IDEA, Part B Requirements

34 CFR §300.304 Evaluation procedures

OSDE Findings:

MEEGS documentation contained missing and/or inappropriate required evaluation components in the following areas:

a) Lack of appropriate documentation to support the Primary (including concomitant disabilities for MD) and/or the secondary disability in 2 files.

2) Areas of Noncompliance: Individualized Education Program (IEP) components

IDEA, Part B Requirements

34 CFR §300.324 Development, review, and revisions of the IEP

OSDE Findings:

Based on file reviews, IEP components were missing and/or inappropriate in the following areas:

- a) Annual goals were missing two short-term objectives in 1 file.
- b) The IEP is not aligned (aligned between needs, current data, goals, and services) in 1 file.

DIRECTIVES:

Due to the areas of noncompliance described in this report, complete the following by the due date provided below.

- Submit an assurance statement, by **April 4, 2025**, signed by the Superintendent ensuring:
 - The district will develop, submit, and follow internal procedures to track and monitor students identified as participating in the alternate assessment to support the teams in making appropriate decisions based on data.
 - District staff will be provided with training to ensure appropriate team decisions are made and appropriately documented on the MEEGS and IEP in compliance with IDEA for students participating in the alternate assessments.

Complete the following by **April 25, 2025**:

- Review, revise, and submit internal procedures that identify students who will participate in the alternate assessment. The procedures must ensure the MEEGS and IEP documentation support the team's decision
- Review, revise, and submit a district plan to monitor the confidential records (e.g. MEEGS and IEP) of students identified for participation in the alternate assessment, ensuring the documentation supports the team's decision
- Provide training to all special education teachers regarding the qualifications for participation in the alternate assessments, appropriate documentation necessary on the MEEGS and IEP, and the district internal procedures.

Complete the following by **May 30, 2025**:

- Review all other files of students whose IEP indicates the student will be participating in the alternate academic achievement standards path. Document the findings on the document provided with this letter. Provide the document with the findings to the OSDE-SES by the date above by uploading the completed document into your district EdPlan>Tools>LEA Document Library>Compliance tab. Notify the OSDE-SES when completed via email at Tina.Spence@sde.ok.gov

The following corrections are expected to be brought into compliance beginning on **August 1, 2025, through September 30, 2025**. The teams may begin with the Review of Existing Data (RED) and parent consent, if needed, to allow time to gather the missing components for the eligibility and IEP meetings.

- Student file corrections (MEEGS and IEPs identified in numbers 1 and 2 above) are brought into compliance and the teams, using data, ensure the students are participating in the appropriate assessment.
- Bring the student files identified in the district review of files not identified in this report and documented on the Excel document into compliance. Ensure all

records (MEEGS and IEP) are compliant and the teams, using data, have identified the appropriate assessment for each student based on data and the significant lifelong adaptive supports.

If you have questions, feel free to contact me at Tina.Spence@sde.ok.gov or by phone at 405-521-4513.

Sincerely,

Tina Spence

Tina Spence

LEAs assessing over 1% of their student population on OAAP

Purpose: Your district has been notified that they are assessing more than 1% of students on the Oklahoma Alternate Assessment (OAAP), and in an attempt to lower the state participation rate, OSDE is reviewing how districts are qualifying students for the OAAP.

Address Part A:

- Answer questions regarding your participation rates

Address Part B:

- Submit an assurance statement signed by the Superintendent and Special Education Director.
- Identify Root Cause.
- Develop an Improvement Plan.
- Establish monitoring tools needed to measure effectiveness of the Improvement Plan.

Date Reviewed	OSDE-SES Reviewer

Part A

Questions regarding participation rates: The required information on this page is intended to assist the district with exploring whether students with disabilities are being correctly identified as having the most significant cognitive disabilities. Please consider each question carefully.

Participation Rates Review	Provide a detailed explanation for each question with a focus on the area of risk (identifying students for alternate assessment) identified in the first review box below.
Are there special circumstances that would suggest the participation rate might be higher than expected (e.g., special programs or services attractive to families with children who have particular disabilities)? Please explain.	
Have your participation rates in the alternate assessment increased steadily or suddenly spiked? Has anything occurred in the district that could explain the change?	
Consider whether participation rates on alternate assessment are higher in some grades than others. Do rates jump when students enter middle school or high school? Consider why this may happen.	
Consider whether participation rates are higher in one school compared to other schools with similar grade levels. Please explain.	
Consider whether participation rates are different for certain subgroups (e.g., Black, Hispanic, Asian, White English learners, economically disadvantaged) compared to the district rate as a whole and compared to other subgroups. Are some subgroups disproportionately participating in the alternate assessment?	

<p>Are many students with disabilities other than intellectual disabilities, autism, and multiple disabilities (such as specific learning disabilities, speech language impairment, emotional disturbance, or other health impairments) participating in the alternate assessment?</p>	
<p>Consider whether some students with the most significant cognitive disabilities repeatedly score proficient and advanced on the alternate assessment in one or more content areas. Do school staff who participate as members of the IEP teams consider whether these students could participate in the general assessment with the necessary supports and accommodations?</p>	

Part B

Assurance Statement:

Districts identified as administering OAAP to more than 1% of their testing population are required to provide the OSDE with assurance that the LEA will review their data and complete this toolkit.

Please provide your assurance statement in the box below and have it signed by the Superintendent and Special Education Director.

Assurance Signatures

Superintendent Signature: _____ Date: _____

Special Education Director Signature: _____ Date: _____

Please describe any improvement activities implemented. Were they effective? If not, please describe why the team feels it was not effective and what are your next steps.

Review your IEP data and identification practices to identify the root cause of why the district is over the 1% threshold for students participating in OAAP.

Improvement Plan

Develop an improvement plan for reviewing your OAAP IEP's to ensure your teams are utilizing the criteria checklist and only placing students who truly meet the definition of a student with the most significant cognitive disability.

- Describe your district's plan.
- List the progress monitoring activity and/or data source that will assist in determining effectiveness of the improvement plan.
- Identify the person(s) responsible for monitoring the progress of the improvement plan.

Dates to Remember

- **December 31st -**
 - Upload completed OAAP Toolkit.

EdPlan Upload Instructions: Upload the Toolkit to EdPlan in the LEA Document Library found by clicking on Tools located on the Main Menu Bar.

OSDE Program Contact:

Kristen Coleman, Email: kristen.coleman@sde.ok.gov, Phone: 405-522-1463



OKLAHOMA STATE
DEPARTMENT OF EDUCATION

December 15, 2025

RE: 2025-2026 OAAP Monitoring Notification

Dear Superintendent

The Every Student Succeeds Act (ESSA) places a statewide 1.0 percent participation cap on students participating in an alternate assessment based on alternate academic achievement standards (AA-AAAS). As a result of the State of Oklahoma exceeding this cap for the 2024-2025 school year, the United States Department of Education granted the Oklahoma State Department of Education's Special Education Services (OSDE-SES) a waiver.

As part of the waiver requirements, the OSDE must submit a plan and timeline by which the OSDE will take additional steps to support and provide appropriate oversight to each LEA that anticipates assessing more than 1.0 percent with the alternate assessment as required by 34 CFR 200.6(c)(4)(v)(B). In the 2024-2025 school year district name assessed 1.00% or more of the district's students on the alternate assessment. This places the district in Tier 1. Please refer to the [Google Drive link](#) for the Tier 1 Requirements.

Another part of the waiver requirements states that the OSDE must notify districts when subgroup disproportionality exists in the percentage of students taking the Oklahoma Alternate Assessment Program (OAAP). Districts must then address disproportionality among students in their LEA as required by 34 CFR 200.6(c)(4)(iii).

	Economically Disadvantaged	Male	Homeless	English Language Learner	Black	Hispanic	American Indian
Risk Ratio 2025 - Math							
Risk Ratio 2025 - ELA							

Please complete the Justification Survey, to address the district's plan for making progress in reducing the disproportionality in the above area(s).

If you have further questions, please contact SDESpecialEducation@sde.ok.gov or 405-521-3351. Thank you for your assistance with this important matter.

Sincerely,

Special Education Services

cc: Special Education Director



Guidance Rubric for Considering Student Eligibility for the Oklahoma Alternate Assessment Program (OAAP)

Student Name: _____
School: _____
Parent(s)/Guardian(s): _____

Date: _____
Date of Birth: _____
Grade: _____

This rubric is provided as a companion document to [The Criteria Checklist for Assessing Student with Disabilities on Alternate Assessments](#) to assist Individualized Education Program (IEP) Teams in making appropriate decisions regarding student participation in the Oklahoma Alternate Assessment Program (OAAP) for students with the most significant cognitive disabilities and adaptive behavior deficits.

IEP Teams must use various data sets in review of a student's eligibility to participate in the OAAP which may include:

- Evaluation team reports
- Benchmark assessment data
- Diagnostic assessments
- Assistive Technology (AT) evaluation
- Speech and Language assessments that determine expressive/receptive language communication status.
- IEP goal/objectives progress data
- Both formative academic and transition assessment data
- Adaptive skills checklists/inventories
- Progress on functional, daily living and life skill standards
- Sensory and/or motor assessments describing access modes of communication, fine/gross motor tasks.

Evidence for the decision to participate in the OAAP is **NOT BASED** on:

1. A disability category or label
2. Poor attendance or extended absences
3. Native language/social, cultural, or economic difference
4. Expected poor performance on the general education assessment
5. Academic and other services student receives
6. Educational environment or instructional setting
7. Percent of time receiving special education services
8. English Learner (EL) status
9. Low reading level/achievement level
10. Anticipated disruptive behavior
11. Impact of student scores on the accountability system
12. Administration decision
13. Anticipated emotional duress
14. Need for accommodations (e.g., assistive technology/Augmentative and Alternative Communication (AAC) to participate in the assessment process

Note: Intelligence quotient (IQ) scores are not a reliable measure when used in isolation to determining eligibility, as many of the assessment tools used to determine IQ are not fully accessible for learners with significant motor, communication, and sensory complexities. IQ scores should never be used in isolation to determine eligibility.

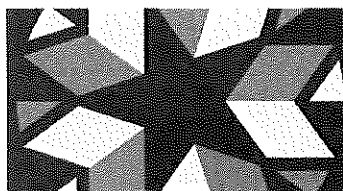
Directions: Review a student's IEP, assessment data, and related documents to answer each question. Mark the column that best answers the question. Responses do not all need to be in the far-right column, but **most** should be in the 3rd column. Only a small number of learners, approximately 1.0 percent across the entire state, should qualify as meeting the criteria for the OAAP designed for Students with the most significant cognitive disabilities.

1. Does the student have a current IEP ? (Skip question if this is for an Initial IEP. Questions regarding IEP content should be answered through supporting documentation)		
No. Stop here , the student is not eligible for alternate assessment.	Yes. Continue to question #2.	
2. Does the cognitive assessment data support a most significant cognitive disability (typically 2 or more standard deviations below the mean as determined by district administered ability assessment, plus significant impairments to a person's ability to reason, plan, solve problems, think abstractly, comprehend complex ideas, learn quickly, and learn from experience? If the student is in the not limited or borderline cognitive limitations category , please stop here ; the student is not eligible for the alternate assessment.		
Not limited	Borderline Cognitive Limitations	Significant Cognitive Limitations
Verbal Intelligence/Cognition (related to language skills)		
Verbal Intelligence in average range or above	Verbal Intelligence -1.50 to -2.0 SD	Verbal Intelligence -2 SD or more below the mean
Nonverbal Intelligence/Cognition (related to visual-spatial skills)		
Non-verbal intelligence in average range or above	Non-verbal Intelligence -1.50 to -2.0 SD	Non-verbal Intelligence -2 SD or more below the mean
Thinking/Reasoning/Problem-Solving		
Reasoning and problem-solving skills at age-level or within average range on an assessment	Requires special education services, including modifications and levels of scaffolding to complete reasoning and problem-solving tasks	Dependent on others for completing tasks that require reasoning and problem-solving
Executive Function/Attention/Memory		
Cognitive planning and working memory at age-level or within average range on an assessment	Requires special education services, including modifications and levels of scaffolding to support cognitive planning and working memory	Dependent on others for completing tasks that require cognitive planning and working memory
Learning		
Learning grade level academic skills	Learning general standards or mastering target or successor linkage level EEs with increasing levels of assistance from special education services and supports	Making progress on the Essential Elements (EEs) with moderate/maximal levels of support

<p>3. Does the adaptive assessment data support a most significant deficit in adaptive behavior? Does the student require systematic, direct instruction of adaptive behavior (an individual's ability to apply social and practical skills in everyday life) skills to be embedded within standards-based instruction? If the student is in the not limited or borderline limitations category, please stop here; the student is not eligible for the alternate assessment.</p> <p>Conceptual skills: receptive and expressive language, reading and writing, money concepts, self-direction</p> <p>Social skills: interpersonal, responsibility, self-esteem, follows rules, obeys laws, is not gullible, and avoids victimization.</p> <p>Practical skills: personal activities of daily living such as eating, dressing, mobility, and toileting; instrumental activities of daily living such as preparing meals, taking medication, using the telephone, managing money, using transportation, and doing housekeeping activities, occupational skills; maintaining a safe environment.</p>		
Not Limited	Borderline Limitations	Significant Limitations
Adaptive Behavior Scale		
Overall adaptive behavior score in average range or above	Adaptive behavior -1.50 to -2.0 SD	Adaptive behavior -2.0 or more SD
Conceptual		
Age-level expressive and receptive communication skills	Beginning to communicate wants/needs/preferences using assistive technology (augmentative device or symbols)	No formal communication system
Learning grade level academic skills	Mastering target or successor linkage level EEs; learning grade level academics with increasing levels of assistance	Making progress on the Essential Elements (EEs) with moderate/maximal levels of supports
Social		
No instruction is needed on responsibility, following rules, interpersonal skills	Systematic, direct instruction in responsibility, following rules, and interpersonal skills	Prescriptive, systematic, direct instruction relating to responsibility, following rules, and interpersonal skills
Practical		
No instruction needed on daily living skills or community living skills	Requires moderate assistance/supports to complete daily living skills and community living skills (e.g., meal prep, phone use, housekeeping); student will likely be successful in supportive living	Dependent on others for daily living skills and community living skills; student will likely need 24 hour supports as an adult

<p>4. Do the student's PLAAFPs indicate adequate performance with Essential Elements curricular standards? If yes, stop here. If no, choose descriptor that best matches student performance.</p>		
<p>Present levels of Academic and Functional Performance (PLAAFP) indicate that the learner's skills are closely aligned with general grade-level standard concepts and skills Stop here, the student is not eligible for alternate assessment</p>	<p>Student PLAAFPs indicate ability to make adequate progress through the <u>most complex alternate standards</u>, with increasing levels of supports and scaffolding, and objectives that include alternate standard skills and concepts or learning progression steps that lead to grade-aligned performance target(s)</p>	<p>Student PLAAFPs indicate ability to make progress through alternate standards (Essential Elements) with maximal supports and scaffolding in order to make progress on concepts and skill targets on the <u>least complex</u> side of the range.</p>
<p>5. What level of support and instruction do the student's goals and objectives describe? What level of documentation is indicated in the evaluation portion of the goals and objectives?</p>		
<p>Statements indicate <u>general levels of academic support</u> to make adequate progress through grade-level standard concepts and skills.</p> <p>Documentation consists of project rubrics, work samples, and/or Instructionally Embedded Assessments, etc. showing student <u>general independence</u> in academic progress. Stop here, the student is not eligible for alternate assessment.</p>	<p>Statements indicate <u>increasing levels of support</u> to make adequate progress through grade-level standard concepts and skills.</p> <p>Documentation consists of project rubrics, work samples, and/or Instructionally Embedded Assessments, etc. showing student's need for <u>increasing levels of continual assistance</u> in making academic progress.</p>	<p>Statements indicate <u>maximal levels of support</u> to make adequate progress through grade-level standard concepts and skills.</p> <p>Documentation consists generally of checklists collected by teacher; documentation indicates <u>maximal levels of support</u> are needed to make academic progress.</p>

Summary Question: Were most ratings in the far right-hand column?



✓	Occurs in	Tasks	Resource/Where to go
<input type="checkbox"/>	August	<ul style="list-style-type: none"> • Visit the Oklahoma DLM webpage to become familiar with the available resources. • Sign up for DLM test updates. • Visit the SDE's OAAP webpage to review the resources and materials that are available to guide the alternate assessment process. • Sign up for the Special Education Listserv to receive monthly OAAP Updates. • Confirm you have an account in Kite Educator Portal. • Identify staff members who will need access to Kite Educator Portal as test administrators and/or building test coordinators and create accounts as needed. 	<p>DLM Oklahoma webpage</p> <p>Subscribe to DLM Test Updates</p> <p>SDE's Alternate Assessment webpage</p> <p>Subscribe to the Special Education Listserv</p> <p>Kite Educator Portal If you do not have access, please email Kristen.Coleman@sde.ok.gov.</p> <p>DLM District Staff Video Resources for Year-End States</p> <p>Checklists for testing coordinators and test administrators are available in the role-specific manuals.</p>
<input type="checkbox"/>	September	<ul style="list-style-type: none"> • Check out DLM's self-directed district-level training. • Monitor that the test administrator(s) completes all parts of the Required Test Administrator Training in Kite Educator Portal. • State-level mass student upload to Kite Educator Portal will be completed by September 30th. After the mass upload, you may add any new enrollees qualifying for the OAAP. • Instructionally Embedded Assessment window opens September 9th (this is optional, but highly encouraged). 	<p>DLM Training for District Roles</p> <p>DLM Educator Resource Videos for Year-End States</p> <p>Guide to DLM Required Test Administrator Training</p>



<input type="checkbox"/>	<p>October</p>	<ul style="list-style-type: none"> • Students must be rostered with their First Contact Survey and Personal Needs and Preferences Profile completed before educators can use the Instructionally Embedded assessments. • Utilize the DLM Test Administration Monitoring extract, column Q to observe assessment activity during the optional instructionally embedded assessment window. • Remind test administrators that student results during the optional instructionally embedded assessment window are not factored into the student's end-of-year Individual Student Score Reports. Also, the results do not predict a student's performance during the required spring assessment window. 	<p><u>Adding and Editing Rosters Video</u> <u>Completing the First Contact Survey and PNP Profile Video</u> <u>Using the DLM Instruction and Assessment Planner During the Optional Instructionally Embedded Window</u> <u>Kite Educator Portal</u></p>
<input type="checkbox"/>	<p>January</p>	<ul style="list-style-type: none"> • Confirm that all educators have an account set up in Kite Educator Portal. • Continue to add new students or students who qualify for OAAP. If you need a student transferred from another district, please email Caroline Misner or Kristen Coleman. 	<p><u>DLM District Staff Video Resources for Year-End States</u> Please email <u>Kristen Coleman</u> when a student transfers into your district from another district. The only information we need is the STN for the student and the site they are attending in your district!</p>
<input type="checkbox"/>	<p>February</p>	<ul style="list-style-type: none"> • The Instructionally Embedded assessment window closes on February 21st. • Please have educators save the IE reports as they will be wiped out of the system to prepare for the spring year-end assessment. • Ensure all testing sites have Kite Suite downloaded on the student testing devices. 	<p><u>Kite Suite</u></p>



<input type="checkbox"/>	<p>March</p> <ul style="list-style-type: none"> • Verify that student demographic information is correct. • Create rosters if that was not done in the IE window. ELA: grades 3-8 and 11 Math: grades 3-8 and 11 Science: grades 5, 8, and 11 U.S. History: grade 11 • Use the Student Roster and First Contact Survey Status extracts to verify students are rostered to all appropriate subjects and that the First Contact Survey has been submitted. • Ensure teachers have passed the Required Test Administrator Training if not completed before the optional window. • Spring Assessment Window will be open from March 24th through May 14th. These assessments are required! 	<p>Kite Educator Portal Adding and Editing Rosters Video</p> <p>Kite Educator Portal</p> <p>Guide to DLM Required Test Administrator Training</p>
<input type="checkbox"/>	<p>April</p> <ul style="list-style-type: none"> • Testing continues! • Utilize the DLM Test Administration Monitoring extract, column U to track the completion of testlets for each subject area. 	<p>Kite Educator Portal</p>
<input type="checkbox"/>	<p>May</p> <ul style="list-style-type: none"> • Please check in with your schools to ensure they are on track to complete testing by May 14th! 	
<input type="checkbox"/>	<p>July</p> <ul style="list-style-type: none"> • Access to score reports in Kite Educator Portal. 	<p>Kite Educator Portal</p>

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