



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

February 14, 2025

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

Dear Superintendent Walters:

I am writing in response to the Oklahoma State Department of Education's (OSDE's) request on December 19, 2024, 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). OSDE requested this waiver because, based on State data for the 2023-2024 school year, OSDE concluded that it may exceed the 1.0 percent cap on AA-AAAS in reading/language arts (R/LA), mathematics, and science in the 2024-2025 school year.

After reviewing OSDE's waiver request, I am granting, pursuant to my authority under section 8401(b) of the ESEA, an extension of the one-year waiver (for school year 2024-2025) of section 1111(b)(2)(D)(i)(I) of the ESEA so that the State may assess more than 1.0 percent of students with an AA-AAAS in R/LA, mathematics, and science.

As part of this waiver, 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.
- Had assessed in SY 2023-2024 at least 95 percent of all students and all students with disabilities who are enrolled in grades for which the R/LA assessments are required.
- 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.

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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 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.

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 continue 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 2024-2025 school year and beyond. Based on the data OSDE submitted, the State has substantially reduced the percentage of students assessed on an AA-AAAS over the past several years (from 1.66 percent in the 2017-2018 school year to 1.35 percent in the 2023-2024 school year in both R/LA and mathematics and from 2.27 to 1.31 percent in science over the same period). 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 the work you are doing 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/

Ruth E. Ryder
Deputy Assistant Secretary for Policy and Programs
and Acting Assistant Secretary
Office of Elementary and Secondary Education

cc: Catherine Boomer, Executive Director of Assessments



December 19, 2024

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 2023-2024 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 2024-2025 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 principals, 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 is seeking comments on this waiver extension request. Any individual or organization may submit written comments on the proposed waiver pursuant to 34 C.F.R. §200.6(c)(4). Comments will be submitted to the U.S. Department of Education. OSDE is providing statewide notice by sending a memo through our Special Education listserv and posting the waiver application on the Oklahoma State Department of Education, Special Education Services (OSDE-SES) webpage. Comments and questions should be submitted to Sherri Coats, Program Director, Special Education Services, using the following email: Abby.Johnson@sde.ok.gov. Public comments must be submitted no later than 5:00 pm Friday, November 22, 2024.

Section 1: Waiver Request

Requirement 1 – (§200.6(c)(4)(i)): Submit the waiver request at least 90 days before 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, 2025, through May 14, 2025. OSDE will submit a waiver request to the U.S. Department of Education for the subject areas of math, ELA, and science prior to Tuesday, December 24, 2024.</p> <ul style="list-style-type: none"> • Date that is 90 days prior to the start date for the OAAP: December 24, 2024. • OAAP Year-End Operational Window (required) is March 24, 2025, through May 14, 2025. • Instructionally Embedded (IE) assessments are for instructional purposes and are optional for LEAs. The IE window is September 9, 2024, through February 21, 2025. • The OAAP testing schedule is disseminated through the Special Education Listserv and is posted to the OAAP webpage. • A memo detailing the testing schedules was sent to the LEAs through the Special Education Listserv on August 27, 2024 (Requirement 1 Attachment).

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.

2023-2024 Oklahoma Student Participation in ELA by Subgroup

Subgroup	Number participating in statewide assessment (ELA) 2024	Number participating in the OAAP (ELA) 2024	Percent participating in the OAAP (ELA) 2024
All students	350598	4734	1.35%
Black	27384	585	2.14%
White	155353	1976	1.27%
Hispanic	72838	917	1.26%
Economically disadvantaged	230485	3970	1.72%
English Learner	39429	564	1.43%
Homeless	9996	142	1.42%
Asian	8550	129	1.51%
Hawaiian/Pacific Islander	1632	28	1.72%
Two or More Races	47109	648	1.38%
American Indian/Alaskan Native	37729	451	1.20%
Male	179582	3083	1.72%
Female	170941	1651	0.97%

2023-2024 Oklahoma Student Participation in Math by Subgroup

Subgroup	Number participating in statewide assessment (Math) 2024	Number participating in the OAAP (Math) 2024	Percent participating in the OAAP (Math) 2024
All students	350281	4734	1.35%
Black	27330	584	2.14%
White	155244	1977	1.27%
Hispanic	72773	917	1.26%
Economically disadvantaged	230254	3968	1.72%
English Learner	39401	565	1.43%
Homeless	10125	144	1.42%
Asian	8547	129	1.51%
Hawaiian/Pacific Islander	1629	28	1.72%
Two or More Races	47069	648	1.38%
American Indian/Alaskan Native	37686	451	1.20%
Male	179426	3085	1.72%
Female	170780	1649	0.97%

2023-2024 Oklahoma Student Participation in Science by Subgroup

Subgroup	Number participating in statewide assessment (Science) 2024	Number participating in the OAAP (Science) 2024	Percent participating in the OAAP (Science) 2024
All students	150150	1945	1.30%
Black	11666	252	2.16%
White	67384	841	1.25%
Hispanic	31067	342	1.10%
Economically disadvantaged	95763	1621	1.69%
English Learner	15226	195	1.28%
Homeless	4113	55	1.34%
Asian	3672	46	1.25%
Hawaiian/Pacific Islander	642	12	1.87%
Two or More Races	19498	261	1.34%
American Indian/Alaskan Native	16221	191	1.18%
Male	76689	1240	1.62%
Female	73422	705	0.96%

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	350598	67122
Students Enrolled	355035	68400
Assessment Participation Rate	98.75%	98.13%
Group	All Students Grades 3-8 and High School Math	Students with Disabilities Grades 3-8 and High School Math
Students Assessed	350281	67079
Students Enrolled	354951	68391
Assessment Participation Rate	98.68%	98.08%
Group	All Students Grades 3-8 and High School Science	Students with Disabilities Grades 3-8 and High School Science
Students Assessed	150150	26536
Students Enrolled	153209	27309
Assessment Participation Rate	98.00%	97.17%

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 provided an assurance 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 <i>Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments</i> • IEP teams are correctly identifying students with the most significant cognitive disabilities based on the evidence in the <i>Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments</i> • IEP teams are informing parents/guardians of the implications associated with their child being assessed on the alternate assessment (Parent Brochure) • IEP teams have a completed <i>Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments</i> in our online IEP platform <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. (Requirement 3 [A] Attachment)</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 provided an assurance 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 2.5%. 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 provided a plan and timeline for future school years 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 request print copies of the State definition from OSDE-SES to provide to IEP team members. (Requirement 4[A], Attachment 1)</p> <p>2022-2023 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. • The OSDE staff participates in the CCSSO-SCASS and CCSSO-ASES meetings to increase our knowledge about assessing students with the most significant cognitive disabilities. • July 2022: Training provided to Special Education Directors regarding OAAP and ensuring their teams refer to our definition of a student with the most significant cognitive disability.

- An OAAP Memo is sent out through our listserv 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.

2023-2024 Plan and Timeline for Improving Our Participation Guidelines:

- 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.
- The OSDE informed districts in February 2023 that the diploma option for students participating in the alternate assessment would transition from a standard high school diploma to a state-defined alternate diploma in compliance with ESSA requirements.

- July 2023: Training provided regarding the *Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments* and ensuring their teams understand what each question on the checklist means. OSDE has released an optional *Guidance Rubric for Considering Student Eligibility for the Oklahoma Alternate Assessment Program (OAAP)* to assist IEP teams when deciding to place a student on alternate assessment.
- July 2023: OSDE released an updated *Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments* to separate our previous question one into two separate questions. When conducting file reviews, it came to our attention that IEP teams were overlooking the criteria of a student having a significant intellectual disability AND adaptive behavior deficit. (Requirement 4 [A], Attachment 2)

2024-2025 Plan and Timeline for Improving Our Participation Guidelines:

- 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 [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 monthly OAAP Memo is sent out via listserv 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. (Requirement 4 [A], Attachment 3)

- 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.

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> (Requirement 4[B], Attachment 1). 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"> • March 2022: Justification Survey results were reviewed for comments made by districts to see areas where districts would benefit from more support and training related to alternate assessment decision-making. • Summer of 2022: The Special Education Office and Office of Assessments collaborated to develop a new tiered monitoring approach to support districts that are over 1.0% to ensure they are appropriately identifying students who meet the requirements for alternate assessment.

The requirements for LEAs to complete at each tier are listed below. We have also attached the monitoring documents that are being provided to districts. (Requirement 4[B], Attachment 2)

Newly Identified Districts:

Tier 1:

- Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment;
- Complete the 1.0% Toolkit.

Tier 2:

- Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment;
- Complete the 1.0% Toolkit;
- Complete a file review of each student identified by SDE utilizing the Rubric for Determining Student Eligibility for OAAP and submit the file reviews to OSDE.

Tier 3:

- Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment;
- Complete the 1.0% Toolkit;
- OSDE will monitor each LEAs alternate assessment IEPs with a monitoring checklist;
- OSDE will meet with each LEA via a virtual meeting to review the results of monitoring.

Previously Identified Districts:**Tier 1:**

- The district will receive a notification letter of their tiered status with information on completing IEP file reviews.

Tier 2:

- The district will receive a notification letter of their tiered status with information on completing IEP file reviews.
- The district will be required to complete reviews of their alternate assessment IEPs to ensure the following: completed cognitive and adaptive behavior assessments, a minimum of one adaptive behavior goal, and each goal has at least two short-term objectives/benchmarks.
- OSDE will review the submitted documents to ensure districts are following OAAP placement criteria and provide targeted support if needed.

Tier 3:

- The district will receive a notification letter of their tiered status with information on completing IEP file reviews.
- OSDE will monitor the LEAs alternate assessment IEPs to ensure the following: completed cognitive and adaptive behavior assessments, a minimum of one adaptive behavior goal, and each goal has at least two short-term objectives/benchmarks.
- OSDE will review the results of monitoring with each LEA via a virtual meeting, phone call, or email.

Small n-size Monitoring:

Based on feedback the OSDE received during the previous monitoring process and the public comment period, we are continuing to implement a small n-size exemption for districts this year. After reviewing our state data, an n-count of 10 or less qualifies a district as a small n-size. Last year OSDE completed IEP file reviews for students who participated in the alternate assessment in a small n-size district. These districts will be notified of their tier and any requirements they must fulfill based on areas they did not address from the monitoring notification in early 2024. Districts have been informed if they need to address the following areas:

- Complete cognitive and/or adaptive behavior assessments.
- Establish a minimum of one adaptive behavior goal.
- Ensure each goal has at least two short-term objectives/benchmarks.

The OSDE will utilize the OAAP IEP Monitoring Red Flags document to identify specific files for monitoring this year in tiers two and three. These files will be shared with the Compliance Monitoring Team in the Office of Special Education to provide additional support to our LEAs.

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. (Requirement 4 [C], Attachment 1) • 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? • The students selected for file reviews in Tier 2 and Tier 3 districts will be selected based on disability category and disproportionality categories that are overrepresented in a district. • OSDE will provide training if requested or needed based on the review of the district’s responses in the <i>Justification for Exceeding 1.0 Percent OAAP Participation</i>.

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
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 showed that it made progress toward its prior year’s plan and timeline.</p>	<p>OSDE is proud to have seen a more substantial reduction in the number of students participating in the alternate assessment and knows there is still work to be done to be under 1.0 percent. We are hopeful that with the continuation of our tiered monitoring process and implementation of the alternate diploma, we will continue to see our numbers decrease with students moving to assessments that are appropriate based on their cognitive and adaptive behavior abilities.</p>

Public Comment: OSDE sought public comment for the 1.0% Extension Request. The public was notified through the Special Education Listserv, and it was posted on the OAAP webpage from October 22 through November 22, 2024. Along with the waiver was a Public Form (Requirement 5, Attachment 1) that could be utilized to submit comments, or the public could submit comments through email to Abby Johnson, abby.johnson@sde.ok.gov.

During the public comment period, OSDE received 38 responses submitted through the form listed above. We have compiled the comment received to submit as evidence of feedback received from districts. 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.

Supporting Documentation

2024-2025 OAAP Update; August 27, 2024

Return

This update will cover:

- 2024-2025 Testing Schedule
- Bulk Student Upload
- Professional Development
- DLM Reminders

2024-2025 Testing Schedule

OAAP Spring Window: **March 24 – May 14, 2025**

	3 rd	4 th	5 th	6 th	7 th	8 th	9 th	10 th	11 th
ELA	✓	✓	✓	✓	✓	✓			✓
Math	✓	✓	✓	✓	✓	✓			✓
Science			✓			✓			✓
History									✓

Instructionally Embedded Assessment Window opens **September 9, 2024**. This is highly encouraged, but optional.

Bulk Student Upload in Kite Educator Portal

OSDE will complete the initial student upload by September 4th. The student enrollments will be based on IEP records in EdPlan. More information on reviewing student data will be included in the next OAAP Update.

Professional Development

Dynamic Learning Maps offers many valuable professional development resources on its website. We will feature a training in each update that educators may wish to utilize. The next course we are introducing is called Forms of Number. This course focuses on identifying forms of number, concrete, pictorial, and numerical. The course will discuss the ways forms of number could be applied to the classroom setting to enhance student understanding.

- [Forms of Number Self-Directed Learning Module](#)
- [Forms of Number Facilitated Module Materials](#)



DLM Reminders

- Subscribe to [DLM Test Updates](#).
- DLM has released a new training module “How to Interpret and Use Score Reports.” The module covers how to read and interpret the performance and learning profile, score report uses, and caution about score report interpretation and uses that are not supported by DLM.
- The Kite Student Portal will need to be updated this year. The installation instructions for each device can be found on the [Kite Suite webpage](#).
- All user accounts in [Kite Educator Portal](#) must be current. Please mark users who are no longer associated with your district for the current school year as inactive. If you utilize the User Upload Template, please use the new templates as there have been many updates to Educator Portal. The User Upload Template is located on Kite Educator Portal under Users on the Upload Users tab.
- DLM Help Desk (Phone Number: 844-261-6481; email: DLM-support@ku.edu)
Do not send any Personally Identifiable Information. The only identifier relating to a student that can be sent is the STN.

If you have any questions, please contact Caroline Misner at caroline.misner@sde.ok.gov or Kristen Coleman at kristen.coleman@sde.ok.gov.



	MATH	ELA	SCIENCE
Grade 3			
Grade 4			
Grade 5			
Grade 6			
Grade 7			
Grade 8			

COLLEGE- & CAREER-READINESS ASSESSMENTS

	ACT	SCIENCE	U.S. HISTORY
Grade 11			

	ONLINE TESTING	PAPER/PENCIL TESTING*	ASSESSMENTS
Grade 3	April 15 - May 14, 2025	April 15 - May 1, 2025	MATH ELA
Grade 4	April 15 - May 14, 2025	April 15 - May 1, 2025	MATH ELA
Grade 5	April 15 - May 14, 2025	April 15 - May 1, 2025	MATH ELA SCIENCE
Grade 6	April 15 - May 14, 2025	April 15 - May 1, 2025	MATH ELA
Grade 7	April 15 - May 14, 2025	April 15 - May 1, 2025	MATH ELA
Grade 8	April 15 - May 14, 2025	April 15 - May 1, 2025	MATH ELA SCIENCE
COLLEGE- & CAREER-READINESS ASSESSMENTS			
Grade 11	April 1 - 25, 2025	April 1 - 11, 2025	SCIENCE U.S. HISTORY
ACT Test	March 25 - April 18, 2025	Please reference the ACT test administration manuals for accommodated testing schedules	
ACT Make-Up	April 22 - May 2, 2025		

WIDA Access/Alternate Access: January 6 - March 21, 2025

National Assessment of Educational Progress (NAEP): October 7 - December 13, 2024;
January 6 - May 23, 2025

Oklahoma Alternate Assessment Program (OAAP) | DLM Testing Window: March 24 - May 14, 2025

**Paper/Pencil testing is only allowable under special circumstances*



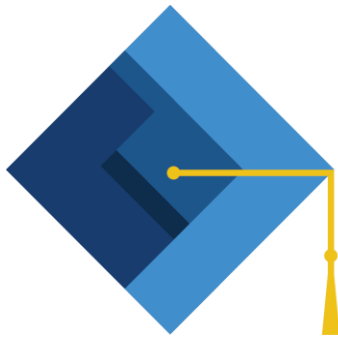
LEA Agreement

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 IEPs.
- (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
- (1) 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
- (2) 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:
 - The number of children with disabilities participating in regular assessments,
 - (1) 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,
 - (5) 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.

**CRITERIA CHECKLIST FOR ASSESSING STUDENTS WITH DISABILITIES
ON ALTERNATE ASSESSMENTS**

Return

NAME OF CHILD: _____ STUDENT ID: _____
FIRST MIDDLE LAST

BIRTHDATE: _____ GRADE: _____ AGE: _____ DATE: _____
MONTH/DAY/YEAR MONTH/DAY/YEAR

PARENT(S): _____

PHONE: (WORK) _____ (HOME) _____ (OTHER) _____

HOME ADDRESS: _____ DISTRICT/AGENCY: _____
STREET ADDRESS/P.O. BOX CITY STATE ZIP





BUILDING: _____ SITE CODE: _____ IEP TEACHER OF RECORD: _____

The OAAP is intended for a very small population of students with the **most significant cognitive disabilities**. Due to the severity of the cognitive disabilities of this population of students, alternate achievement of the content standards is required in daily instruction as well as statewide assessment and the performance expectations aligned with the statewide general assessment are not appropriate even with accommodations. Assessment decisions are made on an annual basis by the IEP team and students must meet certain criteria to be eligible for an alternate assessment. **Students who do not meet the eligibility criteria displayed below SHOULD NOT take the alternate assessment.**

PARTICIPATION CRITERIA CHECKLIST	YES	NO
Does the student have significant intellectual disabilities?	<input type="checkbox"/>	<input type="checkbox"/>
Does the student have 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 feel extensive family/community supports 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 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.

2024-2025 List of Required Training for New DLM Test Administrators

✓	Tasks	Where to go
<input type="checkbox"/>	<ul style="list-style-type: none"> Complete the “Who are Students with the Most Significant Cognitive Disabilities?” module.  Who are Students with the Most Significant Cognitive Disabilities	Kite Educator Portal
<input type="checkbox"/>	<ul style="list-style-type: none"> Please complete the quiz.* 	
<input type="checkbox"/>	<ul style="list-style-type: none"> Complete the “DLM Essential Elements” module.  DLM Essential Elements Overview	
<input type="checkbox"/>	<ul style="list-style-type: none"> Please complete the quiz.* 	
<input type="checkbox"/>	<ul style="list-style-type: none"> Complete the “Principles of Effective Instruction in English Language Arts” module.  Principles of Effective Instruction in English Language Arts	
<input type="checkbox"/>	<ul style="list-style-type: none"> Please complete the quiz.* 	
<input type="checkbox"/>	<ul style="list-style-type: none"> Complete the “Effective Instruction in Mathematics” module.  Effective Instruction in Mathematics	
<input type="checkbox"/>	<ul style="list-style-type: none"> Please complete the quiz.* 	

*The quiz must be completed with a score of 80% or better.


2024-2025 List of Required Training for New DLM Test Administrators

✓	Tasks	Where to go
<input type="checkbox"/>	<ul style="list-style-type: none"> • Complete the “Individual Education Programs Based on DLM Essential Elements” module.  Individual Education Programs Based on DLM Essential Elements	Kite Educator Portal
<input type="checkbox"/>	<ul style="list-style-type: none"> • Please complete the quiz.* 	
<input type="checkbox"/>	<ul style="list-style-type: none"> • Complete the “Overview of the Dynamic Learning Maps Alternate Assessment System” module.  Module 1 - Self-Directed	
<input type="checkbox"/>	<ul style="list-style-type: none"> • Please complete the quiz.* 	
<input type="checkbox"/>	<ul style="list-style-type: none"> • Complete the “Understanding and Delivering Testlets in the DLM Alternate Assessments” module.  Module 2 - Self-Directed	
<input type="checkbox"/>	<ul style="list-style-type: none"> • Please complete the quiz.* 	
<input type="checkbox"/>	<ul style="list-style-type: none"> • Complete the “Test Administration and Scoring” module.  Module 3 - Self-Directed	
<input type="checkbox"/>	<ul style="list-style-type: none"> • Please complete the quiz.* 	

*The quiz must be completed with a score of 80% or better.

2024-2025 List of Required Training for New DLM Test Administrators



✓	Tasks	Where to go
<input type="checkbox"/>	<ul style="list-style-type: none"> • Complete the “Preparing to Administer the Assessment” module.  Module 4 - Self-Directed	Kite Educator Portal
<input type="checkbox"/>	<ul style="list-style-type: none"> • Please complete the quiz.* 	
<input type="checkbox"/>	<ul style="list-style-type: none"> • Print off your DLM Test Administrator Certificate! 	

*The quiz must be completed with a score of 80% or better.

2024-2025 Justification for Exceeding 1.0 Percent OAAP Participation Survey

Return

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 2025 spring operational window, please complete the following survey by **March 3, 2025**.

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?

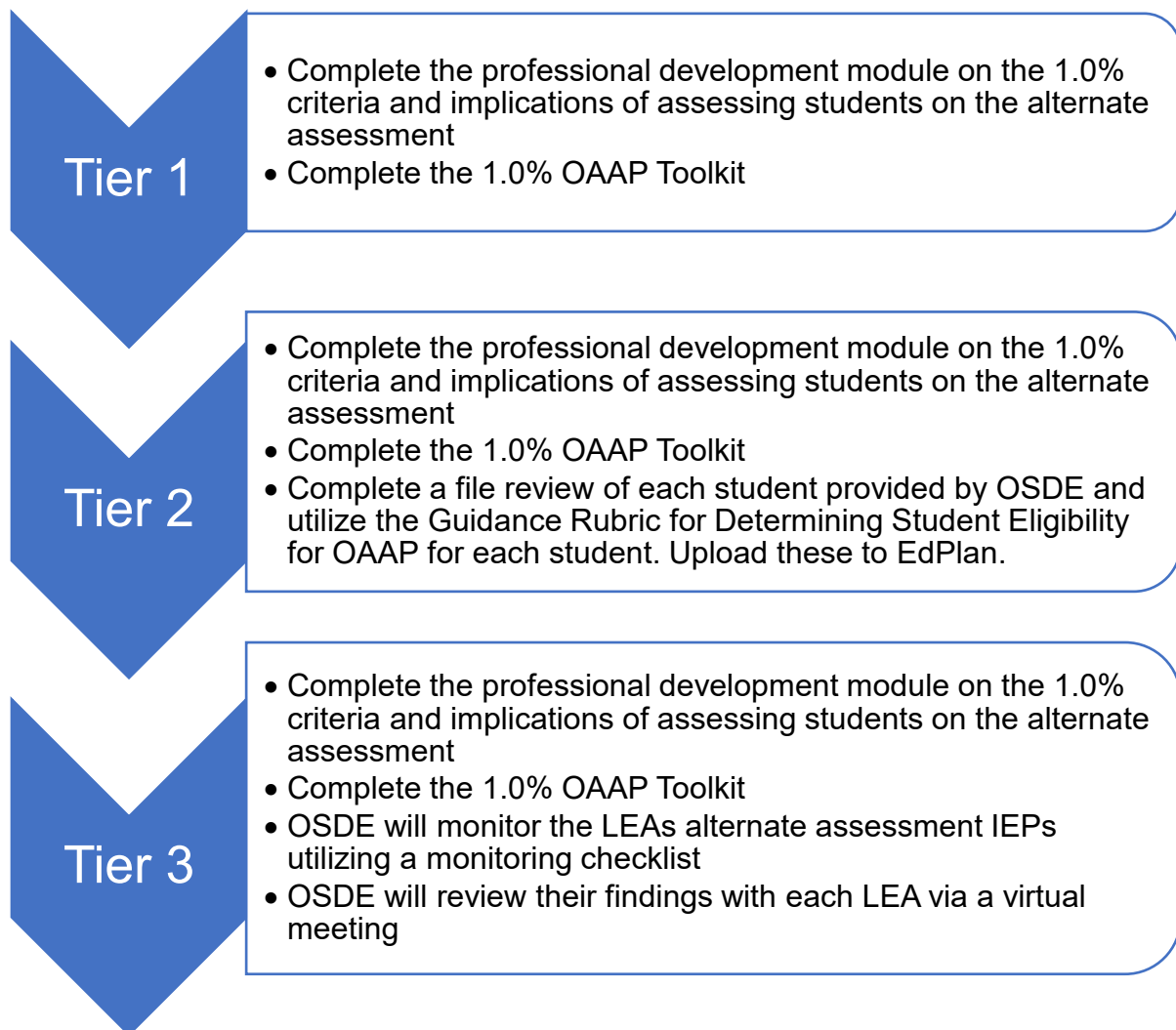
13. What resources and technical assistance does the district need from SDE to ensure students are being assessed using the appropriate assessment? *

Alternate Assessment Differentiated Monitoring Tiers

All districts that exceeded 1.00% of their student population participating in the alternate assessment will receive a letter emailed to them by December 13, 2024, indicating the tier their district is placed in based on the 2023-2024 testing data.

Important Information:

- Please download and save the Dates to Remember document.
- Refer to the tiered breakdown below to review what is expected of your district.



Upload the Toolkit and IEP reviews (if applicable) to EdPlan in the LEA Document Library found by clicking on Tools located on the Main Menu Bar.

[Professional Development Module Link](#)

Monitoring Dates to Remember for Newly Identified Districts to OAAP Monitoring

Date of Task Completion	Task	Explanation
December 13th	Monitoring Notification	Review Monitoring Notification Letter emailed to the district.
December 18th	Webinar (10 a.m.)	Review the Monitoring Notification Letter for tier information. LEAs are required to attend one of these sessions.
December 18th	Webinar (2 p.m.)	Review the Monitoring Notification Letter for tier information. LEAs are required to attend one of these sessions.
February 28th	Toolkit uploaded to EdPlan	Upload toolkits to EdPlan>Tools>LEA Document Library.
March 4th	Tier 2 - Rubrics due from monitoring of IEPs	In your Monitoring Notification Letter, districts received information on how to access the list of STNs for IEP review utilizing the rubric attached to the letter.
*March/April	Virtual Meetings will be scheduled with Tier 3 districts	A meeting will be scheduled with districts to review OSDE's monitoring of OAAP IEPs.
May 31st	Professional Development Due (sign-in sheet)	Upload the Tiered Letter received in October with the names of participants to EdPlan.

** A fillable toolkit will be emailed to all Special Education Directors.

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 the 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.
<p>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.</p>	
<p>Have your participation rates in the alternate assessment increased steadily or suddenly spiked? Has anything occurred in the district that could explain the change?</p>	
<p>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.</p>	
<p>Consider whether participation rates are higher in one school compared to other schools with similar grade levels. Please explain.</p>	
<p>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>	

**OSDE Office of Assessments & Special
Education Services**

<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>	

OAAP 1% Toolkit

**OSDE Office of Assessments & Special
Education Services**

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

- **February 28th -**
 - 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.

OAAP 1%
Professional
Development



OAAP 1% Professional
Development

This course will address the guidelines IEP teams should utilize when making alternate assessment placement decisions and the implications of those decisions for students.



Self-paced
1 credit



Alternate Assessment Differentiated Monitoring Tiers*

All districts that exceeded 1.00% of their student population participating in the alternate assessment will receive a letter emailed to them by December 13, 2024, indicating the tier their district is placed in based on the 2023-2024 testing data.

Important Information:

- Please download and save the Dates to Remember document.
- Refer to the tiered breakdown below to review what is expected of your district.

Tier 1

- The letter is a notification to districts of their tiered status. If your district was notified that disproportionality exists, please address that through one of the methods listed in the notification letter.

Tier 2

- The district will receive a notification letter of their tiered status with information on completing IEP file reviews. If your district was notified that disproportionality exists, please address that through one of the methods listed in the notification letter.
- The district will be required to complete reviews of their alternate assessment IEPs to ensure the following: completed cognitive and adaptive behavior assessments, a minimum of one adaptive behavior goal, and each goal has at least two short-term objectives/benchmarks.
- OSDE will review the submitted documents to ensure districts follow the OAAP placement criteria and provide targeted support if needed.

Tier 3

- The district will receive a notification letter of their tiered status with information on completing IEP file reviews. If your district was notified that disproportionality exists, please address that through one of the methods listed in the notification letter.
- OSDE will monitor the LEAs alternate assessment IEPs to ensure the following: completed cognitive and adaptive behavior assessments, a minimum of one adaptive behavior goal, and each goal has at least two short-term objectives/benchmarks.
- OSDE will review their findings with each LEA via email, phone call, or a virtual meeting.

**This document is for districts that were previously identified.*

Monitoring Dates to Remember for Alternate Assessment Differentiated Monitoring Tiers

*This document is for districts that were previously identified.

Date of Task Completion	Task	Explanation
December 13th	Monitoring Notification	Review Monitoring Notification Letter emailed to the district.
February 28th	Tier 2 – Google Form due	In your Monitoring Notification Letter, districts received the link to access the OAAP Tiered Monitoring IEP File Review Form .
March 24th	Tier 3 – IEP review notification	All Tier 3 districts will receive notification of OSDE’s IEP file reviews via email, phone call, or a virtual meeting.
*Beginning in March	SDE will review IEP reviews submitted by districts	<p>Districts will be contacted by SDE if needed to review the OAAP placement criteria and complete an Improvement Plan.</p> <p>*If a district is required to complete an Improvement Plan it will be due May 15, 2025.</p>

OAAP Tiered Monitoring IEP File Review Form

Tier 2 districts will complete the following form when reviewing their alternate assessment IEPs.

* Indicates required question

1. Email *

2. Please list your name and title. *

3. Please list the name of your district. *

4. Please confirm that every student in your district participating in the OAAP has a cognitive evaluation completed. If any files are missing the cognitive evaluation, please list the number of files and the district's plan to have that completed. *

5. Please confirm that every student in your district participating in the OAAP has an adaptive behavior evaluation completed. If any files are missing the adaptive behavior evaluation, please list the number of files and the district's plan to have that completed. *

6. Please confirm that every student in your district participating in the OAAP has a minimum of one adaptive behavior goal. If any files are missing the adaptive behavior goal, please list the number of files and the district's plan to have that completed. *

7. Please confirm that every student in your district participating in the OAAP has at least two short-term objectives/benchmarks for each goal. If any files are missing two short-term objectives/benchmarks for each goal, please list the number of files and the district's plan to have that completed. *

Alternate Assessment Differentiated Monitoring Small N-Size

All districts that exceeded 1.00% of their student population participating in the alternate assessment will receive a letter emailed to them by December 13, 2024, indicating the tier their district is placed in based on the 2023-2024 testing data.

After reviewing our state data, we define a district with an n-count of 10 or fewer as having a small n-size. These districts will be notified of their tier and any requirements they must fulfill based on areas they did not address from the monitoring notification in early 2024.

Districts have been informed if they need to address the following areas:

- Complete cognitive and/or adaptive behavior assessments.
- Establish a minimum of one adaptive behavior goal.
- Ensure each goal has at least two short-term objectives/benchmarks.

The OSDE will utilize the OAAP IEP Monitoring Red Flags document to identify specific files for monitoring this year in tiers two and three. These files will be shared with the Compliance Monitoring Team in the Office of Special Education to provide additional support to our LEAs.

OAAP IEP Monitoring Red Flags

Using the DLM First Contact Survey

The First Contact survey is the first step once students are enrolled and rostered for the DLM. The First Contact survey consists of learner characteristics and covers various areas, including communication, academic skills, and attention. The special education teacher completes the first contact survey for every student taking the OAAP. For students who took OAAP the previous school year, the survey must be reviewed, updated, and submitted each year. No testlets can be assigned until it is submitted.

What is Considered a Red Flag?

OSDE analyzes the First Contact survey when monitoring IEP files to ensure only those students with the most significant cognitive disability are taking the alternate assessment. A red flag is a data point that stands out when thinking about the most significant cognitive disability. Some students identified with red flags from the first contact survey may be more appropriately challenged by taking the general assessment with accommodations. Other students may still be appropriate to take an alternate assessment.

VARIABLES ANALYZED

- Primary disability
- Instructional reading level with comprehension
- Missing cognitive and/or adaptive behavior evaluations

Primary disability: Three primary disabilities that are flagged: speech and language impairment, specific learning disability, and emotional disturbance. The first requirement for a student to participate in the DLM is that the student has a most significant cognitive disability – a review of student records indicates an intellectual disability or multiple disabilities that significantly impact intellectual functioning (functioning 2 or more standard deviations below the mean).

While a student with only a specific learning disability, speech impairment, or emotional disturbance may have significant academic challenges, he or she has the intellectual potential to reach grade-level expectations. The description of specific learning disability, speech or language impairment, and emotional disturbance and the definition of significant cognitive disability present conflicting information.

The second requirement is the student has significant deficits in adaptive behavior – those skills and behaviors essential for someone to live independently and to function safely in daily life (typically functioning 2 or more standard deviations below the mean). These limit a student's ability to apply social and practical skills such as personal care, social problem-solving skills, dressing and eating, using money, and other functional skills across life domains.

Is the primary disability marked on the First Contact survey, correct?

- Is this the most appropriate primary disability for the student? We know students with a most significant cognitive disability continue to need support in adult life. Are we limiting the available support for the student after graduation?

Instructional reading level with comprehension:

- If a student can read with comprehension at or above a 2nd-grade level, is this a most significant cognitive disability?

Missing cognitive and/or adaptive behavior evaluations: When placing a student on alternate assessment the IEP Team must complete the [Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments](#). As part of the tiered monitoring process districts are notified of missing evaluations.

- The team checks yes or no if the student has a significant intellectual disability. To check yes, there needs to be a full-battery assessment designed to produce a comprehensive estimate of overall IQ, documented on the most recent MEEGS.
- The team checks yes or no if the student has significant adaptive behavior deficits. To check yes, norm-referenced rating scales will be completed to evaluate adaptive behaviors of both the home and school setting documented on the most recent MEEGS.

When an IEP has been found with a red flag the information will be sent to the Compliance Monitoring Team in the Office of Special Education Services for further investigation and oversight. The Compliance Monitoring Team will work with the district to ensure the staff is following the proper identification and eligibility procedures.



Return

OKLAHOMA STATE
DEPARTMENT of EDUCATION

December 13, 2024

RE: 2024-2025 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 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 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)(iv)(B). In the 2023-2024 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 2024 - Math							
Risk Ratio 2024 - 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 me at caroline.misner@sde.ok.gov or 405-522-1677. Thank you for your assistance with this important matter.

Sincerely,

Caroline Misner

Caroline Misner
Office of Assessments
Project Manager, OAAP

cc: Special Education Director

2024-2025 Public Comment Feedback Form for the 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 **October 22 - November 22, 2024**.

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. First and Last Name

2. Email Address

3. Please select your role. *

Mark only one oval.

School district employee

Parent

Community Member

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

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

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

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

Public Comments Received for the 2024-2025 1% Waiver Request Extension

Question 1: What suggestions would you like to share with OSDE to assist IEP teams with the decision to place a student on alternate assessment?

Public Comment Responses:

- (Five responses were blank)
- No suggestions
- Per federal law it says states can only have alternate assessments if they promote access to the general education curriculum. However, 78% of students in OK who participate in OAAP spend less than 80% of their day in the general education classroom. Schools are using alternate curriculum as allowed by the state, but these curriculum do not prepare students to be able to try to earn a regular diploma. Such as OTECA and TeachTown. I noticed on the schools form for schools who are placing more than 1% of students on OAAP the SDE asked them if they need further training. The SDE should require it for schools who exceed the 1% cap. Training should be provided that goes over accommodations and modifications. It is a ubiquitous issue the teachers and in [district name] admin do not know the difference. But this is not a [district name] specific issue as indicated by the LRE placement decisions across the state for OAAP.
- Professional Development and Training: Offer comprehensive, ongoing training for IEP team members, including special education teachers, general education teachers, school psychologists, and administrators, to ensure they fully understand the eligibility criteria for alternate assessments and the impact of this decision on a student's educational trajectory. I appreciate the module training for the OAAP teachers, but others need to be aware of the qualifications and process.
- Give a clear definition of what that means to the parents. Explain what the differences are between the alternate assessment and general education and what that means long term. Need to be clear about asking the alternate assessment questions without them already filled in and explaining what the questions mean. Or maybe not even having them in the IEP at all. They should never have questions answered before discussion with the parents.
- Checklist is great; however seems unfair when a student is so extremely low--multiple grade levels low--but do not qualify for the OAAP due to adaptive scores. The checklist is good; however, there are some students that fall through the cracks. Will never, ever come anywhere close to performing adequately on the state test and it takes DAYS for them to read it, but don't qualify for OAAP.
- The OSDE should require training for accommodations and modifications for all school staff if a school exceeds the 1% cap. This includes training needs to

include school admin. We need to presume competence. Oftentimes, districts are placing students on OAAP seemingly based on disability category and not on data. It should also be a parent's decision, not the school team's decision alone.

- The 6 question OAAP consideration form has made an impact on our determinations, Specifically, question #4: "Does the IEP team feel extensive family/community supports will be a lifelong requirement regardless of modifications, accommodations or adaptations implemented in the student's program?". We accentuate the phrase "lifelong requirement" when contemplating OAAP participation.
- Training for staff and directors on how to use the rubric and checklist. Have targeted training for dependent districts to address the long term ramifications of OAAP. Dependent districts do not have High School students, so may not discuss alternative diploma and placement in full time special education if they do not have full time special ed in the district.
- It may be beneficial for OSDE to offer an annual OAAP-related webinar to school administration/Directors of special services as a reminder of the qualification requirements for the Alternate Assessment. New special education directors may benefit from training on the OAAP qualification rubric. OSDE may consider adding an OAAP training to Project 613.
- Being in a small district, I would like to have a little leniency about the number of students we put on alternate assessments. For example, we will have 6 students this year on alternate assessment. If we have 6, we will be slightly over the 1%. However, all 6 students meet the requirements for alternative assessment.
- There needs to be some kind of assessment between the OAAP & OSTP. There are several students who cannot have any success with the OSTP, but also do not meet the qualifications for the OAAP. By only using two measures, we are forgetting a significant part of our population in special education.
- Consider teams input, and relevant data. Look beyond the students disability, and at their ability. In some instances I do believe supporting a student with OAAP, is appropriate. I understand that the rolling average in some years may make my district exceed the 1% threshold.
- I don't even know if this is doable, but it feels very subjective. If there was a more objective way to determine eligibility. I feel even the criteria checklist is objective. I feel like teachers would appreciate a much more clear picture of what an OAAP participant looks like.
- Quit penalizing districts that through no fault of their own have high numbers of OAAP students. Our district has a Nursing Home that is one of the facilities in Oklahoma that take teenage patients. We have to service them. Not every situation is black and white.
- Require training by the SDE to educate teachers on modifications and accommodations if they exceed the 1% cap. Our school automatically places

children on alternate curriculum based on their diagnosis instead of trying general education curriculum, modified.

- Training! they use OAAP to drive placement. They do not view our kids as part of the general education classroom and have to basic morality when it comes to them as people in general.
- Take the word “and” out of the statement: Does the student have significant intellectual disabilities AND significant adaptive behavior deficits? and replace with “OR”.
- SDE should require training on appropriate accommodations and modifications for special education teachers and all administrators in schools that exceed the 1% cutoff.
- require training by the SDE for accommodations and modifications for all school staff if a school exceeds the 1% cap. This includes training to include school admin.
- continue to review the criteria for OAAP participation, provide examples/definitions of the criteria as needed
- I think the procedures we have in place are adequate. I appreciate the guidance from the OSDE.
- Information regarding the exact definition of “requires life long assistance”.
- How severe do students disability have to be to be eligible to take the OAAP?
- The decision to place a student on an alternate assessment is very clear.
- Students who are taking the OAAP because they have a need to do so.
- The new checklist is helpful, but can be confusing to use.
- I think the process the State has in place is working.
- The state form to help decide OAAP students is good
- I would like to see some sample assessments.
- Let us teach instead of so much paperwork.
- I don't have any at this time.
- None

Question 2: Do you have any comments, questions, or concerns about the monitoring process explained in the waiver for districts that are over 1%?

Public Comment Responses:

- (1 Blank Response)
- No (5 Responses)
- Yes. When congress put this 1% cap into ESSA they actually proposed one half on one percent based on their data as to who should qualify. The unions and schools pushed that to be double. So the SDE needs to take more accountability for making sure local schools fully understand how to first support students in general education. Also moving a student to OAAP should never dictate placement, curriculum, and the opportunity to try to graduate with a standard diploma. But when schools supplant the general education

curriculum with alternate curriculum, it is in fact preventing that student from ever being able to truly try to earn a regular diploma.

- 1% is an impossible number to achieve. As of today in just my 6th-12th graders, I have 6 who must be assessed through the OAAP. Districts who go above and beyond to serve the most vulnerable are punished by the 1% limit because families choose to seek out & move into these districts. My district's percentage will continue to grow with the number of children moving up into the testing grades. We have worked hard to create programs serving our most severe & vulnerable students. What we are doing daily in the classroom is greatly benefiting them, but will never prepare them to move from the OAAP to OSTP.
- As long as the district can support their stance on placing a student on an alternative assessment through instructional supports outlined and followed through the IEP, and documented conversations with the students home support team are had, I do not think any further justification is necessary. For those districts that are disproportionately recommending students, create a flow chart that outlines the process and alternatives.
- Flexibility for Unique Circumstances: Some districts may have valid reasons for exceeding 1%, such as demographic factors or the presence of specialized programs. These cases should be considered thoughtfully during monitoring. We have an army base: [name] that feeds into our school district. [Fort name] is a compassionate assign for soldiers with children who have significant disabilities.
- The rubrics that were provided by the OSDE were very helpful for our IEP teams to determine which students needed placed on the Alternate Assessment. We have a small district, so often times we are over the 1%. However, the rubrics provided insight and good discussion which led to our number of OAAP students decreasing.
- Yes, I have a concern. Students that are low intellectually, very low and can't possibly do the regular OSTP even if it is over the 1% should be allowed to do alternate assessment without question. I have a concern about this, because in low income rural areas there are more intellectually disabled people.
- I feel that the monitoring process is punitive. We only place students who qualify, using the checklist, for OAAP testing. They are our Autistic, ID, or MD students. If these students reside in our district, and require this service, why should the school district be penalized?
- None, other that less than one percent is a very small number, and when you are in a growing district, and you have a student that truly needs the OAAP test, it feels like a punishment to the district and the student to have to justify why the district tests more than 1%.
- The fact that they know what is best for the students I disagree. They are not executing what is in the best interest of the student. The school systems are no

complying with federal regulations and laws and the states aren't holding them accountable for them.

- This is important for our district as we have such a small student population and a high special education percentage. We only have 3 students who take the OAAP, but even with that small number our percentage is above the 1% threshold.
- Proportionally, the 1% ratio is unfavorable to small, rural schools. In a district with 300 or less total students, if there are more than two students that need to be alternatively assessed, the district will never meet the 1% ratio.
- Districts cannot help if more than 1% of their community population has students with disabilities who cannot take the OSTP and need the OAAP. 1% needs to be gotten rid of.
- In my opinion, all districts would rather be under 1%. It seems punitive that districts have to go through the monitoring process when they are serving their students.
- The OSDE has provided meaningful input and recommendations to my district regarding the 1% cap. This has been very useful to me as a new special education director.
- I have sibling students in my district who are ID. How can you get around the students being over the 1%. The sibling do not retain any information.
- Concerns of the monitoring process: it is not effective. An entire generation of students will have graduated before the state gets to the 1% cap.
- I do not. I have been through a monitoring and the process and questions helped our IEP teams show that they had made appropriate decisions.
- The current monitoring process is not effective. An entire generation of students will have graduated before the state gets to the 1% cap.
- I understand the process and really hope we don't have to do it. Unfortunately though, we are normally always over 1%.
- I'm concerned with the fact that we can't control what students, special needs/OAAP or not, that live in our district.
- My concern is that many students will have graduated before it gets to the 1% cap. This does not seem effective.
- No concerns; some districts will be forever in this category because we cannot refuse who comes to our school.
- It's not effective! An entire generation of students will have graduated before the state gets to the 1% cap.
- They are over using OAAP as placement and it is too easy for the district to place kids on OAAP
- We did ask for a waiver this last year due to being just over 1%.
- Yes, not fair. Explanation is below!
- No, it is very clear.
- No, not at this time.
- None at this time.

- Not at this time
- Let us teach.
- No questions

Question 3: Please list any other comments, questions, or concerns you have regarding the plan of improvement addressed in the waiver.

Public Comment Responses:

- (11 Responses were Blank)
- None at this time.
- Oklahoma has requested a waiver every year since 2017 when NCLB was reauthorized to ESSA. In 7 years, the state has only reduced OAAP participation by 0.34%. That is not statistically significant improvement. It is minimal improvement at best. That is a little less than a 5% improvement per year. At this rate it will be another 12 years for the state to reach that 1% cap (which is double what congress's data showed it should be). That means more than entire generation of students is being adversely impacted by the SDE and school's lack of urgency to address this issue for this population of students. These students have poorer post school outcomes because of these decisions. Oklahoma's plan is clearly not working, or they would not need to request yet another year of a waiver.
- The state of OK has requested a waiver every year since NCLB was reauthorized to ESSA. That means OK has requested a waiver for exceeding the 1% cap every year since 2017. In 2017 1.69% of students in OK participate in OAAP. In 2024 1.35% of students in OK participated in OAAP. At this rate it would take around 20 years to reach the 1% cap. (And that 1% cap is actually double what congress wanted it to be. Their data showed it should be 0.5%). In OK 78% of students that participate in OAAP spend less than 80% of their day in gen ed. Two-thirds of those spend less than 40% of their day in gen ed.
- Parents should be properly informed of the consequences of exclusion from general education classes with typically developing peers if they choose the alternate route. We did not fully understand the school's intention with OAAP and now we have been met with constant resistance in getting our child any time in general education with the appropriate modifications and accommodations. They have also denied our request to get off OAAP, so it has had a negative impact on my child.
- Just because they are in GenEd class doesn't mean they are being given the accommodations they should be so the percentage is arbitrary. How they are actually being taught is more critical. [district name] explains it exceeds the threshold of requirement but we know first hand they are not executing appropriate and effective education.

- None at this time.
- require training by the SDE for accommodations and modifications for all school staff if a school exceeds the 1% cap. This includes training needs to include school admin. The training needs to be done by outside sources not from within the district that has zero clue what they are doing or have no moral value
- I'm sorry, but a plan of improvement for Intellectually disabled students, i don't think is fair. How can you improve the fact that they are ID and cannot possible take a regular OSTP Please advise on this matter, I would really like to know how to fix it. Unless I'm to throw them to the curb.
- This is important for our district as we have such a small student population and a high special education percentage. We only have 3 students who take the OAAP, but even with that small number our percentage is above the 1% threshold.
- I agree that we need to monitor who we are putting on OAAP better, but what do we do about the kids that fall in between the normal state testing and the OAAP. It is really difficult to figure out what is best for those kids.
- In OK 78% of students that participate in OAAP spend less than 80% of their day in gen ed. Two-thirds of those spend less than 40% of their day in gen ed. My son is one of those and we are trying to fight our way off of OAAP.
- Again, I feel that if the district is using the checklist and guide template with fidelity, and the student truly needs the OAAP test, to have to fill out the waiver and report is a consequence to the staff and the students.
- I thought completing the plan was very helpful for my district in clarifying the Criteria Checklist and allowed us up reduce the number of students tested by the alternate assessment.
- By placing children on OAAP, [district name] is using that "track" to drive placement and force our kids to be taught by an alternative curriculum and alternative standards.
- A good emphasis and explanation has been put on the OAAP progress and process, which I think is great; however, kids still are falling through the cracks.
- I'd like to teach in the classroom more instead of having to do so much OAAP testing that takes way too long.
- Our state numbers have continued to decline due to the efforts of OSDE to educate school administration.
- What if improvement is impossible? In the case of our nursing home students. Are there other options?
- Thank you for letting us comment and I hope we get the waiver!
- Could OAAP monitoring be included in the DDP?
- Well laid out plan with SMART goals.
- It needs to be gotten rid of (1%)
- I believe it is fair to everyone.
- It seems thorough.

- Let us teach.
- none
- None