

Pursuant to the memo released on August 27, 2018 on the subject of “*Additional Information Regarding the Requirements to Request a Waiver from the One Percent Cap on the Percentage of Students Who May Be Assessed with an Alternate Assessment aligned with Alternate Academic Achievement Standards (AA-AAAS)*” the Kentucky Department of Education (KDE) is submitting an addendum to the original waiver extension request submitted on August 7, 2018.

Because KDE had already submitted a request to extend the waiver for all subject areas for the 2018-2019 school year prior to the release of the memo, this addendum is intended to provide clarification to specific components in the memo as well as provide updated data.

- How the State will **improve the implementation of its guidelines for participation in the AA-AAAS** including by reviewing and, if necessary, revising its definition of students with the most significant cognitive disabilities (see 34 CFR 200.6(d)(1)), so that the State meets the 1.0 percent cap in each subject for which assessments are administered in future school years;

Kentucky developed the Alternate Assessment and Diploma Advisory Group (AADAG) who focused on data analysis, training development, and guidance to reduce the percentage of students participating in the alternate assessment. For more information on the states steps to improve the implementation of its guidelines, please see page 3 of the August 7, 2018 waiver request.

Additionally, Kentucky has two assessment windows for students participating in the alternate assessment. Therefore, the changes and universal training plan did not begin until mid-school year 2017-2018. Kentucky anticipates change in reducing the percent of students participating in the alternate assessment in the 2018-2019 data once a full year of implementation has occurred.

Meeting agendas for the AADAG are included in *Attachment 1*.

- Data from the **current or previous school year**^[4] to show the number **and** percentage of students **overall and from each subgroup of students** who will take or took the AA-AAAS with respect to each subject for which the State seeks a waiver;

The 2017-2018 final public release data is set for December, 2018. The KDE will submit the final analysis of results to the U.S. Department of Education at that time.

Since the release of the preliminary data from Kentucky’s statewide assessment, the Kentucky Performance Rating for Education Progress (K-PREP) for school year 2017-18, the KDE has determined the participation rates of students taking the AA-AAAS was just over 1.0 percent in each of the subject areas. Based on these preliminary data, the state anticipates exceeding the 1.0 percent threshold set forth in ESSA for the 2018-2019 school year. **Table 1** displays participation rates by subject area for the 2017-2018 AA-AAAS. The preliminary data are located on the KDE Open House webpage for publicly available education data. The data will not be available on the Kentucky School Report Card until the final public release in December.

^[4] A State applying for a waiver for the 2018-2019 school year could submit data from either 2018-2019 (current school year) or 2017-2018 (previous school year).

Table 1: 2017-2018 Alternate Assessment Participation by Subject

SUBJECT 2017-18	NUMBER PARTICIPATING IN ALTERNATE ASSESSMENT	NUMBER PARTICIPATING IN STATEWIDE ASSESSMENT	PERCENT PARTICIPATING IN ALTERNATE ASSESSMENT
Reading (elem/middle)	3,579	308,172	1.16 %
Math (elem/middle)	3,579	308,172	1.16 %
Writing (elem, middle, high)	1,915	150,284	1.27 %
Social Studies (elem/middle)	1,262	102,975	1.23 %
Science (elem/middle)	1,112	102,608	1.08 %
Reading (high)	634	48,005	1.32 %
Math (high)	611	47,972	1.27 %
Science (high)	653	48,033	1.36 %
Social Studies (high)*	N/A	N/A	N/A

* U.S. History and Social Studies were not assessed in high school for the 2017-2018 school year due to the social studies initial standards revision process being conducted and no high school field test available.

The KDE compared and analyzed a variety of sources to measure progress made in both the data and waiver plan. **Table 2** demonstrates the year-to-year change in percent of students participating in the AA-AAAS.

Table 2: Comparison of SY 2016-17 and SY 2017-18 Alternate Assessment Participation by Subject

SUBJECT	SY 2016-17 PERCENT PARTICIPATING IN ALTERNATE ASSESSMENT	SY 2017-18 PERCENT PARTICIPATING IN ALTERNATE ASSESSMENT	PERCENT CHANGE
Reading (elem/middle)	1.16%	1.16%	0.00%
Math (elem/middle)	1.16%	1.16%	0.00%

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SUBJECT	SY 2016-17 PERCENT PARTICIPATING IN ALTERNATE ASSESSMENT	SY 2017-18 PERCENT PARTICIPATING IN ALTERNATE ASSESSMENT	PERCENT CHANGE
Writing (elem,middle, high)	1.27%	1.27%	0.00%
Social Studies (elem/middle)	1.28%	1.23%	-0.05%
Science (elem/middle)	N/A	1.08%	N/A
English II/ELA (high)	1.24%	1.32%	+0.08%
Algebra II/Math (high)	1.41%	1.27%	-0.14%
Biology/Science (high)	1.17%	1.36%	+0.19%
U.S. History/Social Studies (high)**	1.09%	N/A	N/A

** Due to no administration in 2017-2018 as stated in Table 1, a percentage change cannot be calculated.

The KDE preliminary data analysis of participation by subject area revealed the percent of students participating in the AA-AAAS decreased in social studies at the elementary and middle school level and decreased in math at the high school level.

In order to see substantial progress in reducing the number and percent of students participating in the alternate assessment, at least a full year of implementing the new participation guidelines and training will be needed. This is due to the timeline of the two Kentucky alternate assessment testing windows. Since Kentucky starts alternate assessment testing in November of the school year, alternate assessment participation decisions made by each Individual Education Program (IEP) team, known in Kentucky as the Admissions and Release Committees (ARC) had been made prior to the new participation guidelines being released. Kentucky anticipates a reduction in alternate assessment participation after full implementation of the guidelines occurs at the local level.

Although the participation by subject area does not demonstrate a significant reduction in the percentage of students tested using the AA-AAAS, the KDE analysis of data has found a reduction in both overall statewide percent of student participation in the AA-AAAS and in eligibility determinations for the AA-AAAS. **Table 3** demonstrates the reduction in the overall statewide percent of students participating in alternate assessment by 0.08%. **Table 4** below demonstrates a reduction in overall statewide percentage of students eligible for the alternate assessment.

Table 3: Overall Statewide Participation (not by subject) (2017-2018 preliminary data on School Report Card)

School Year	Number of Students Participating in Alternate Assessment	Number of Students Participating in Statewide General Assessments	Percent of Students Participating in Alternate Assessment
2017-2018	5,477	496,074	↓ 1.10%
2016-2017	5,911	499,674	1.18%

Table 4: Overall statewide percentage of students eligible to participate in the alternate assessment

School Year	Number of Students Eligible to Participate in the Alternate Assessment	Number of Students (all)	Percentage of Students Eligible to Participate in the Alternate Assessment
2017-2018	6,242	648,369	↓ 0.96%
2016-2017	6,380	656,588	0.97%

Additionally, the KDE reported 170 of the 173 districts in Kentucky assessed more than 1.0 percent of their students using an AA-AAAS in one or more subjects during the 2016-2017 school year. The 2017-2018 preliminary data indicate a reduction of 26 districts or 144 out of 173 districts assessing more than 1.0 percent of their students using an AA-AAAS in one or more subjects. The KDE anticipates the reduction in districts to continue with full implementation of the new participation guidelines and additional training.

- Data from the current or previous school year^[4] show the number and percentage of students overall and from each subgroup of students, who will take or took the AA-AAAS with respect to each subject for which the State seeks a waiver;

On September, 26, 2018, the KDE publicly reported preliminary assessment data for the school year 2017-2018. However, per state regulation 703 KAR 5:240 Section 7 (*Attachment 2*), districts have 10 days after the official release to request adjustments to or appeal their data. The KDE requires time to review the requested appeals and adjustments in order to validate the data for a final public release.

Until these data are finalized, the KDE has included as *Attachment 3*, the 2017-2018 preliminary number and percentage of students overall and from each subgroup of students who took the AA-AAAS in 2017-2018 by subject area.

The KDE has also updated the data for 2016-2017 (*Attachment 2* in the August 7, 2018 waiver) to include the number and percentage of students overall and from each subgroup of students who took the AA-AAAS in 2016-2017 by subject area. The updated data is in *Attachment 4*.

- Data to show that the State has assessed the achievement of at least 95 percent of all students and 95 percent of children with disabilities who are enrolled in grades for which the assessment is required (note: include data separately for each requested subject

– reading/language arts (R/LA), mathematics and/or science). This percentage must include all students assessed with the general assessment and the AA-AAAS for each applicable subject;

Table 5 demonstrates the state has assessed the achievement of at least 95 percent of all students and 95 percent of students with disabilities (SWD). See page 3 of the of the August 7, 2018 waiver for more information.

Table 5: 2017-2018 (preliminary) Overall Statewide Assessed by Subject

Subject	Enrolled	Assessed	Percent Tested
Reading/Language Arts (RLA) - All Students Total Grades 3 - 8 and High School (HS)	356,177	354,177	99.44%
Reading/Language Arts - Students with Disabilities (SWD) Total Grades 3 - 8 and HS	47,039	46,563	98.99%
Math - All Students Total Grades 3 - 8 and HS	356,144	354,147	99.44%
Math - SWD Total Grades 3 - 8 and HS	47,014	46,542	99.00%
Writing - All Students Total Grades 3 - 8 and HS	150,284	149,026	99.16%
Writing - SWD Total Grades 3 - 8 and HS	17,932	17,683	98.61%
Social Studies - All Students Total Grades 3 - 8 and HS	102,975	102,395	99.44%
Social Studies - SWD Total Grades 3 - 8 and HS	13,335	13,178	98.82%
Science - All Students Total Grades 3 - 8 and HS	150,641	149,741	99.40%
Science - SWD Total Grades 3 - 8 and HS	18,839	18,637	98.93%
Reading/Language Arts (RLA) - All Students Total Grades 3 - 8 and High School (HS)	356,177	354,177	99.44%

- How the State will **monitor and regularly evaluate each LEA** to ensure that the LEA provides sufficient training such that school staff who participate as members of an ARC or other placement team understand and implement the guidelines established by the State for participation in an AA-AAAS so that all students are appropriately assessed; and

To meet the 90 day submission requirement, the Kentucky request to extend the waiver was submitted on August 7, 2018; which is several months before the final 2017-2018 district level data would be available. This early submission required Kentucky to acquire Local

Educational Agency (LEA) assurances without current data. In an attempt to meet the waiver requirements the KDE focused on districts that anticipated exceeding 1.0 percent. To identify those districts a comparison of the percent of students participating in the alternate assessment for 2016-2017 school year data and the current percent of students eligible to participate in the alternate assessment were analyzed. On July 23, 2018 the KDE requested assurances from all 170 districts identified based on these data. The district assurances included verification that the ARC is following the updated *Kentucky Alternate Assessment Participation Guidelines* when making assessment participation decisions for students, ARC chairpersons have completed the required alternate assessment participation training modules and the district will address any disproportionality in the percentage of students in any subgroup taking the alternate assessment.

As of October 1, 2018, the KDE released preliminary assessment data for the 2017-2018 school year and only 144 districts actually assessed more than 1.0 percent of students with an AA-AAAS in one or more subjects. With the release of the 2017-2018 data, districts who assessed more than 1.0 percent of its assessed students in any subject will be sent data along with instructions on completing the justification process.

Districts who assessed more than 1.0 percent of their students using AA-AAAS during the 2017-2018 school year are required to submit a justification survey to the KDE. The KDE, in partnership with the Alternate Assessment and Diploma Advisory Group (AADAG), is currently developing an updated justification survey for the 2018-2019 school year. See *Attachment 5* for the justification survey draft. This survey will help districts understand and justify why more than 1.0 percent of their students were assessed with an AA-AAAS. It will also require districts to validate their ARC members have been provided sufficient training and are effectively implementing the *Participation Guidelines* to ensure all students are appropriately assessed. The new justification survey will inform the KDE of future training, monitoring and coaching opportunities needed. The KDE will make the justifications for the 2018-2019 school year publicly available on the IDEA Reporting page of the KDE website.

The KDE and the AADAG developed, trained and implemented a targeted monitoring process, described on page 6 of the August 7, 2018 Kentucky waiver request. Based on the previous monitoring results, the KDE has updated the *Participation Guidelines for the Kentucky Alternate Assessment Review Document*. The results indicated student-specific issues that the district should address through the ARC process and the need for further training on implementation of the *Participation Guidelines*. The KDE in collaboration with the regional education cooperatives will provide additional training specific to the needs of each district and region based on the findings.

Based on feedback from a Director of Special Education survey, universal training module survey and from the regional education cooperatives, the AADAG have made several revisions to the waiver plan and timeline. The group has completed additional guidance and revisions including:

- *Attachment 6*: additions made to the universal training modules
- *Attachment 7*: state's definition of an English Learner student with the most significant cognitive disability

- *Attachment 8: updated Guidance for ARCs on Participation Decision for the Kentucky Alternate Assessment 2018-2019 draft*
- How the State will **address any disproportionality** in the percentage of students taking an AA-AAAS as identified through the data provided.^[2]

The KDE implemented a targeted monitoring process to address disproportionality in the percentage of students taking an AA-AAAS in 2016-2017, described on page 4 of the August 7, 2018 Kentucky waiver request.

Once the 2017-2018 final public data release is available in December 2018, the KDE will calculate and analyze the statewide level of disproportionality of students participating in the alternate assessment by subgroup and subject area for the 2017-2018 school year to identify the subgroups with overwhelming disproportionality.

Previous school year data indicated that the subgroup with overwhelming disproportionality are those eligible for free or reduced price meal in the subject areas of reading and math. Due to the high level of disproportionality among this subgroup in 2016-2017 data, the KDE focused on reviewing and monitoring this subgroup in the subject areas of reading and math. To increase awareness and identify training needs, the monitoring results are being disseminated to districts and the regional education cooperatives. The KDE will use 2017-2018 data to continue to address disproportionality, by subgroup, in the percentage of students taking an AA-AAAS through statewide data analysis, district level data analysis and the targeted monitoring process described on page 4 of the August 7, 2018 waiver. More information on this process is on page 4 of the August 7, 2018 Kentucky waiver request.

^[2] 34 CFR 200.6(c)(4)(iv)