

KENTUCKY DEPARTMENT OF EDUCATION
PUBLIC NOTICE AND COMMENT PERIOD
WAIVER REQUEST PURSUANT TO 34 C.F.R. §200.6(c)(4)
JULY 19, 2018

Pursuant to 34 C.F.R. §200.6(c)(4), the Kentucky Department of Education (KDE) will seek to extend a waiver for the 2018-2019 school year from the Secretary for the United States Department of Education. The regulation in question, found at 34 C.F.R. 200.6(c)(2), requires State Education Agencies such as the KDE to limit the total number of students assessed in a subject area using an alternate assessment. The limit on the percentage of students assessed by the alternate assessment is set by the federal regulation, stating the total number of students assessed with the alternate assessment per subject area shall not exceed 1.0 percent.

Specifically, 34 C.F.R. 200.6(c)(2) provides:

For each subject for which assessments are administered under § 200.2(a)(1), the total number of students assessed in that subject using an alternate assessment with alternate academic achievement standards under paragraph (c)(1) of this section may not exceed 1.0 percent of the total number of students in the State who are assessed in that subject.

NOTICE OF PUBLIC COMMENT PERIOD: Any individual or organization may submit written comments on the proposed waiver pursuant to 34 C.F.R. §200.6(c)(4). Written comments shall be accepted through August 2, 2018.

You may send written comments on the proposed waiver to: Veronica Sullivan, Assistant Director, Division of Learning Services, Office of Teaching and Learning, Kentucky Department of Education, 300 Sower Boulevard, Fifth Floor, Sower Building, Frankfort, KY 40601. Mrs. Sullivan may be reached by telephone at 502-564-4970, by fax at 502-564-4124 or through email at Veronica.Sullivan@education.ky.gov.

The requirements for a State Education Agency to seek a waiver are set forth at 34 C.F.R. §200.6(c)(4) and are reproduced below. The KDE is requesting to extend a waiver previously granted by the United States Department of Education in response to the requirements set forth at 34 C.F.R. §200.6(c)(4) because its most recent data (2016-2017) on the percentage of students taking Kentucky's alternate assessments in all subject areas stands at over 1.0 percent (*see Table 1*).

The waiver requirements are in bold lettering below.

If a State anticipates that it will exceed the cap under paragraph (c)(2) of this section with respect to any subject for which assessments are administered under § 200.2(a)(1) in any school year, the State may request that the Secretary waive the cap for the relevant subject, pursuant to section 8401 of the Act, for one year. Such request must—

- (i) ***Be submitted at least 90 days prior to the start of the State's testing window for the relevant subject;***

The KDE 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). Kentucky has two testing windows for the

AA-AAAS. The first testing window for all subject areas begins November 5, 2018. Submission of this waiver request comes 90 days prior to the start of the first testing window.

- (ii) **Provide State-level data, from the current or previous school year, to show—**
 (A) **The number and percentage of students in each subgroup of students defined in section 1111(c)(2)(A), (B), and (D) of the Act who took the alternate assessment aligned with alternate academic achievement standards; and**

Because Kentucky’s state assessment window for the AA-AAAS begins in November 2018 and due to the requirements that states submit a waiver at least 90 days prior to the assessment window, participation data from the 2017-2018 assessment is not available at the time of this waiver request. Assessment data for 2017-2018 will be available in October, 2018. Once received, the KDE will review, analyze and submit the results to the U.S. Department of Education.

Participation rates by subject for the 2016-2017 AA-AAAS (see Table 1) are available on the Kentucky School Report Card. Based on the data, the state anticipates exceeding the 1.0 percent threshold set forth in the Every Student Succeeds Act (ESSA) for the 2018-2019 school year.

Table 1: 2016-2017 Alternate Assessment Participation by Content

Content	Number Participating in Alternate Assessment	Number Participating in Statewide Assessment	Percent Participating in Alternate Assessment
Reading (Elem/Mid)	3,528	305,340	1.16
Math (Elem/Mid)	3,528	305,340	1.16
Writing (Elem/Mid/High)	1,870	147,638	1.27
Language Mechanics (Elem/Mid/High)	1,132	102,311	1.11
Social Studies (Elem/Mid)	1,297	100,937	1.28
Science ¹ (Elem/Mid)	1,162	0	N/A
English II (High)	621	50,213	1.24
Algebra II (High)	677	47,893	1.41
Biology (High)	573	49,050	1.17
U.S. History (High)	512	47,178	1.09

¹ Due to revised science standards and science field tests being conducted, Kentucky did not generate student scores for the statewide assessment in the area of science, in 2016-2017; however, science was assessed on the AA-AAAS.

(B) The State has measured the achievement of at least 95 percent of all students and 95 percent of students in the children with disabilities subgroup under section 1111(c)(2)(C) of the Act who are enrolled in grades for which the assessment is required under § 200.5(a);

Kentucky adheres to federal participation requirements for assessment and requires all students enrolled in public K-12 schools to be assessed with accommodations, without accommodations or with AA-AAAS. The only exception to participation for any student is a medical or extraordinary circumstances non-participation waiver. To date, Kentucky has met or exceeded the federal guidelines set at a participation rate of 95% of all students, including students with disabilities in the Kentucky Performance Rating for Educational Progress (K-PREP) assessment.

For the 2016-2017 school year, Kentucky's participation rate for students with disabilities exceeded the guidelines set at 95% participation in all grades and courses in which assessment was required. Because Kentucky's state assessment window for the AA-AAAS begins in November, 2018 and due to the requirement that states submit a waiver at least 90 days prior to the assessment window, participation data from the 2017-2018 assessment is not available at the time of this waiver request. Assessment data will be available in October, 2018. Once received, the KDE will review, analyze and submit the results to the U.S. Department of Education.

(iii) Include assurances from the State that it has verified each LEA that the State anticipates will assess more than 1.0 percent of its assessed students in any subject for which assessments are administered under § 200.2(a)(1) in that school year using an alternate assessment aligned with alternate academic achievement standards—

(A) Followed each of the State's guidelines under paragraph (d) of this section, except paragraph (d)(6); and

As planned and outlined in the 2017-2018 waiver, the KDE reviewed and analyzed local district data on participation from the 2016-2017 school year and discovered 170 of 173 districts assessed more than 1.0 percent of students with an AA-AAAS in one or more subjects. In September, 2017 the KDE required each district that assessed more than 1.0 percent of its student population using AA-AAAS in school year 2016-17 to provide written assurances that each local Individual Education Program (IEP) team, known in Kentucky as the Admissions and Release Committee (ARC), was following the *Alternate Assessment Participation Guidelines* when making assessment participation decisions. All districts provided the written assurance to the KDE.

In partnership with the Alternate Assessment and Diploma Advisory Group (AADAG), the KDE sought feedback from stakeholders across the Commonwealth and revised the *Alternate Assessment Participation Guidelines*. The revised *Alternate Assessment Participation Guidelines* include the state's definition for students with the most significant cognitive disabilities and provides detailed guidelines for ARCs to consider when making decisions for individual students.

In November, 2017 the KDE emailed all districts and regional special education cooperatives information about the updated *Kentucky Alternate Assessment Participation Guidelines*, the waiver process, timeline and information on how to calculate participation rates to compare with other districts and state levels.

Since the review of previous data leads Kentucky to believe it will exceed the 1.0 percent cap for students assessed with AA-AAAS and all districts have been trained in the revised *Kentucky Alternate Assessment Participation Guidelines*, the KDE is again requiring written assurances from districts that have assessed more than 1.0 percent of their students using AA-AAAS during the 2016-2017 school year. Districts must assure the KDE that each ARC is following the updated *Kentucky Alternate Assessment Participation Guidelines* when making assessment participation decisions for students, that ARC chairpersons have completed the required alternate assessment participation training modules and that the district will address any disproportionality in the percentage of students in any subgroup taking the alternate assessment. The training modules are further explained in [section iv](#).

Districts that assessed more than 1.0 percent of their students using AA-AAAS during the 2016-2017 school year were also required to submit a justification survey to the KDE by December 15, 2017. The justification survey was designed to conduct a root cause analysis within each district explaining why more than 1.0 percent of the student body was being assessed with the AA-AAAS. It surveyed the reasons for exceeding a 1.0 percent participation rate along with the training levels of ARC members in using *Alternate Assessment Participation Guidelines*. The survey responses (*see Table 2*) identified areas where local districts needed further support and training. The survey responses were used to adjust professional development opportunities provided by the KDE and regional special education cooperatives. These trainings are further discussed in [section iv](#). More information on the statewide implemented universal training plan can be found under the heading [P4AA Project Training](#).

(Table 2 begins on next page.)

Table 2: Responses to the Justification Survey

Survey Item	Number of Respondents	Percentage of Respondents
The ARC lacked the necessary knowledge to effectively use the participation guidelines when defining a student as having a significant cognitive disability.	10	4.65%
Lack of knowledge of how to gather and analyze the appropriate data when making the decision.	15	6.98%
Small district size that results in a greater impact of individual students on participation rates (example: district size 180 students with 2 students with significant cognitive disabilities results in higher than 1% participation rate)	123	57.21%
Previous 1% cap was based on percentage of students counted as proficient in Title I accountability and the new 1% cap is strictly based on percentage of students participating in the alternate assessment, regardless of score.	22	10.23%
High concentration of regional center medical facilities, care homes or group homes within the district	19	8.84%
Proximity to military base with special education services	3	1.40%
Other (please specify)	102	47.44%

Districts were provided an option to provide “other” justifications on the survey. The responses included common themes focused on student enrollment, student eligibility for the alternate assessment and a need for training in specific areas. The common themes identified among responses include:

Student Enrollment

- decrease in overall student enrollment over the last few years
- non-resident students are open enrolled into the district
- transient pupil population (i.e., students who have been enrolled in multiple schools per school year, students enrolling from group homes and medical facilities)
- higher enrollment of students with moderate to severe disabilities because specialized programs and resources are available in the district
- has not exceeded 1.0 percent participation, but anticipates it may exceed in the future

Student Eligibility

- 1.0 percent calculation based on each subject area as opposed to an overall population

- participation affected the numbers
- high number of IDEA eligible students with significant cognitive disabilities

Need for Training

- socio-economic issues (e.g., low poverty levels, high levels of substance abuse)
- district misinterpretation of the participation criterion required for alternate assessment

Results from the justification survey are publicly available on the [IDEA Reporting page](#) of the KDE website.

The KDE, in partnership with the AADAG, is currently developing an updated justification survey for the 2018-2019 school year. 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 inform future training and coaching opportunities. The KDE will make the justifications for the 2018-2019 school year publicly available on the [IDEA Reporting page](#) of the KDE website.

(B) Will address any disproportionality in the percentage of students in any subgroup under section 1111(c)(2)(A), (B), or (D) of the Act taking an alternate assessment aligned with alternate academic achievement standards;

The KDE is again requiring written assurances from districts that have assessed more than 1.0 percent of their students using AA-AAAS during the 2016-2017 school year. Districts must assure the KDE that the district will address any disproportionality in the percentage of students in any subgroup taking the alternate assessment.

The KDE calculated 2016-2017 district level disproportionality percentages and risk ratios for students assessed with the alternate assessment in the content areas of reading and math, who are eligible for free or reduced price meals.

Based on that data, the KDE and the AADAG developed, trained and implemented a targeted monitoring process. The KDE targeted risk ratios exceeding 2.0 to identify specific districts with the highest disproportionality in alternate assessment participation among students eligible for a free or reduced price lunch.

The KDE randomly selected ten districts for monitoring. These districts were identified as:

- assessing more than 1.0 percent of students using AA-AAAS; and
- having the highest rate of disproportionality among the free and reduced price lunch subgroup based on Kentucky's risk ratio.

Monitoring activities included:

- a random selection of 10 alternate assessment participant student files to review the *Kentucky Alternate Assessment Participation Guidelines*
 - If the district had ten or fewer students in the alternate assessment, the KDE reviewed all participants.
 - If the district had greater than ten students participating, the KDE selected only 10 student files to review.
- review of the use of the *Kentucky Alternate Assessment Participation Guidelines* using the Participation Guidelines for the *Kentucky Alternate Assessment Review Document*
- feedback provided to districts on the use of the *Kentucky Alternate Assessment Participation Guidelines* and appropriate documentation completed by the ARCs

The KDE collaboration with the AADAG will continue to address disproportionality in subgroups taking the AA-AAAS through multiple activities including:

- calculation and analysis of subgroup participation rates in each content area
- identification of subgroup overrepresentation in the AA-AAAS participation
- technical assistance on the *Kentucky Alternate Assessment Participation Guidelines* to districts and schools with identified disproportionality
- maintenance of AA-AAAS online resources including the *Criteria for Determining Alternate Assessment Participation*; (guidelines, guidance document, parent guide), description of and examples from the alternate assessment and the AA-AAAS Administration Guides and trainings
- continued support and guidance for the use of participation guidelines for the alternate assessment
- comparison of data to determine additional training and support needed
 - baseline data collected during spring 2018 monitoring
 - data collected during June 2018 desk reviews on use of new *Kentucky Alternate Assessment Participation Guidelines*.

(iv) ***Include a plan and timeline by which—***

(A) The State will improve the implementation of its guidelines under paragraph (d) of this section, including by reviewing and, if necessary, revising its definition under paragraph (d)(1), so that the State meets the cap in paragraph (c)(2) of this section in each subject for which assessments are administered under § 200.2(a)(1) in future school years;

The KDE, in partnership with the AADAG group revised *Kentucky's Alternate Assessment Participation Guidelines* to:

- promote a consistent standard for districts to use when determining a student's individual assessment needs;
- collect individual student data for monitoring appropriate documentation that a student has a significant cognitive disability; and
- ensure students are being assessed using the appropriate method to demonstrate knowledge.

By February, 2018 the following guidance documents had been developed, disseminated, and trained across the state:

- revised *Participation Guidelines for the Alternate Assessment* to clarify participation criteria and documentation requirements
- state definition of students with the most significant cognitive disability
- *Guidance for ARCs on Participation Decisions for the Kentucky Alternate Assessment 2018*, complete with descriptions of the participation requirements, assessment information, terminology and frequently asked questions
- updated *Parent Guide to the Alternate K-PREP* to include the implications of student participation in the alternate assessment as it applies to the type of diploma the student earns, as well as the student's postsecondary and career pathway

The KDE and its Alternate Assessment and Diploma Advisory Group, in collaboration with the special education regional cooperatives, developed a plan for extensive statewide training and support through professional development on the AA-AAAS. This plan is known as the P4AA Project.

P4AA Project Training

To facilitate the adoption of the revised guidelines, free professional learning was provided for all districts. The project included information on the requirements of the AA-AAAS waiver, completion of the *Kentucky Alternate Assessment Participation Guidelines*, preparing for an ARC meeting to determine a student's assessment needs, completion of the Learner Characteristics Inventory (LCI), and how to analyze data to understand district alternate assessment populations in relation to the 1.0 percent cap.

A series of five universal training modules were required for all ARC members. The purpose of these training modules was to implement the requirements set forth in the ESSA and support districts in the implementation of the *Kentucky Alternate Assessment Participation Guidelines*. The universal training modules include:

- *Module 1: ESSA 1% Waiver Information* - changes in reporting requirements and communicating changes with district staff
- *Module 2: Completing the Participation Guidelines as an ARC Chairperson* – defining a significant cognitive disability; how students participate in KY state assessments; accommodations vs. modifications; and how to complete and implement the participation guidelines for determination
- *Module 3: Preparing for the ARC to Complete the Participation Guidelines* – defining a significant cognitive disability; how students participate in KY state assessments; accommodations vs. modifications; and how to prepare to answer and document all participation guidelines criteria
- *Module 4: Completing the Learner Characteristics Inventory (LCI)* – purpose and use of this tool; guidance on using data to answer each question in the tool; using the tool to support ARC decisions
- *Module 5: Using Data Sources to Understand & Describe Alternate Assessment Population* – how a district uses data sources to understand and describe students who typically participate in the alternate assessment; what data sources and procedures to use to determine if students are appropriately assessed; analyzing LCI data; local education agency (LEA) data comparisons; and red flags to review

Training on the five components of P4AA was facilitated by the KDE using a Learning Management System (LMS) through interactive modules. Each training was evaluated to gather data about knowledge gains and skill acquisition. A formal evaluation report, including the summary and analysis of both quantitative and qualitative data, was completed by project evaluators within a month of LMS roll-out. This report was updated every 15 days and shared with project leadership for program improvement.

Successful module completion required a passing score on a post-training assessment. The assessments included scenarios to gauge knowledge and application of specific concepts. Self-assessment results were measured through electronic surveys collected at the conclusion of each module.

As of June 4, 2018, at least one module had been completed by 5,033 users. These users represented 175 LEAs and 1,136 schools. In all, 10,059 modules have been completed (see *Table 3*).

Table 3: Module Completion Overview

Completers	Module 1	Module 2	Module 3	Module 4	Module 5
As of June 4, 2018	814	2,253	3,336	3,295	361

In addition, the KDE in collaboration with low incidence consultants (coaches) at the special education regional cooperatives, provided additional coaching through tele-conferencing. The target audience was ARC team members who provide services to students participating in the AA-AAAS. While these coaching sessions were not mandatory, districts with high percentages of participation in the AA-AAAS were strongly encouraged to participate. The coaching sessions provided:

- guidance and support to ARC members in the application of the recently revised *Kentucky Alternate Assessment Participation Guidelines*
- one-on-one coaching to district staff, in person and by phone
- technical assistance regarding the implementation of the P4 Project
- guidance around best practices and instructional programs
- simulated ARC meetings:
 - ARC members were given an opportunity to apply knowledge gained from the universal training modules. Each ARC simulation required the ARC team(s) to make student participation decisions based on a series of case studies.
 - Participants engaged in an in-depth look at each of the participation criterion and the sources of evidence including data to support each decision.
 - ARC teams had the opportunity to practice determining participation in AA-AAAS by synthesizing the student case study data from various scenarios.

Post-training surveys collected the roles of participants and asked participants whether their understanding of key elements from the training had increased. The intent is to facilitate results-driven accountability (RDA) to improve student outcomes through professional learning opportunities.

Coaches have hosted (on-site) over eight technical assistance sessions with embedded ARC Simulation elements for over 100 DoSEs. There also have been over 23 team-coaching sessions, which have prepared over 600 educators. Post-training surveys were completed by 242 participants. The majority of districts that have participated in the training and ARC Simulation hosted by the special education regional cooperatives show strong evidence that DoSEs and ARC teams are working collaboratively to implement the revised participation guidelines in a consistent manner. Early fidelity data demonstrates that districts are progressing in their implementation of the *Kentucky Alternate Assessment Participation Guidelines*. The data demonstrate the KDE, regional special education cooperatives, and local districts are collaboratively focusing on the unique needs of individual students.

To inform and engage parents in conversations and decisions about alternate assessment participation, the KDE posted all alternate assessment participation information on the KDE website and has shared the information with parent advocacy groups across the Commonwealth. In service of this engagement initiative, the group updated the *Parent Guide to Alternate K-PREP* (including a Spanish version), complete with descriptions of the assessments, terminology, and frequently asked questions.

Based on district and regional feedback of implementation and improvement strategies needed, the KDE provided support to the districts through an informative video and Frequently Asked Questions on the technical completion of the new *Kentucky Alternate Assessment Participation Guidelines* in the Kentucky Student Information System (KSIS).

Oversight of districts included monitoring the implementation of *Kentucky Alternate Assessment Participation Guidelines* through the *Alternate Assessment Participation Guidelines Record Review* document. From January 2018 through March 2018, the KDE monitoring team conducted on-site visits and interviews to ensure districts were utilizing the updated *Kentucky Alternate Assessment Participation Guidelines* and other guidance documents to make informed, appropriate decisions for students who are participating in AA-AAAS. The process included:

- analysis of data to identify five districts with the highest participation rates
- districts identified for on-site monitoring were notified that DLS would review the implementation of the *Kentucky Alternate Assessment Participation Guidelines*
- exceptional children consultants used the *Participation Guidelines Record Review* document to:
 - determine the appropriate use of the new *Kentucky Alternate Assessment Participation Guidelines* participation guidelines
 - identify specific areas where training and coaching are still needed
 - establish baseline data
- interviews with local DoSEs to obtain:
 - feedback on the district's use of the previous participation guidelines
 - root causes for high participation in the alternate assessment
 - suggestions for specific training and support still needed
 - feedback on the state's implemented universal training plan and training modules

(B) 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 of its assessed students in a given subject in a school year using an alternate assessment aligned with alternate academic achievement standards to ensure that only students with the most significant cognitive disabilities take an alternate assessment aligned with alternate academic achievement standards. The State must describe how it will monitor and regularly evaluate each such LEA to ensure that the LEA provides sufficient training such that school staff who participate as members of an IEP team or other placement team understand and implement the guidelines established by the State under paragraph (d) of this section so that all students are appropriately assessed;

2018-2019 Training and Monitoring Plan

The AADAG continues to assist the KDE with developing statewide processes for ensuring all students are appropriately assessed and that districts are provided with appropriate support and technical assistance.

For the 2018-2019 school year, the KDE will review district data on participation rates in each subject of the alternate assessment. Districts that exceed the 1.0 percent participation rates will be required to provide the KDE with a detailed justification for

exceeding the 1.0 percent cap. An updated justification survey will be provided to districts for completion. The justification survey is a tool for the state to use for oversight and support to districts to ensure each student is appropriately identified for participation in the AA-AAAS. Through the justification survey process, districts will provide information to the state on additional supports needed at the local level, a description of possible root causes and the district's plan to address its needs. The KDE will follow-up with individual districts with targeted supports and any necessary corrective actions.

Statewide universal training and support will continue to be provided for local school districts. The ongoing training and implementation plan includes:

- utilizing feedback from districts regarding desk audit reports
- developing a new justification survey for districts based on feedback and district needs
- developing and engaging educators in additional trainings and coaching sessions provided by the regional special education cooperatives
- determining needs for informing and engaging parents around participation in the AA-AAAS in collaboration with districts, the statewide parent training and information network and parent advocacy groups
- publicly reporting statewide AA-AAAS data while maintaining student confidentiality
- publicly reporting district justification survey responses
- addressing disproportionality among various subgroups in the percentage of students taking the AA-AAAS by continued monitoring
- continuing to provide oversight and support to each district exceeding the 1.0 percent participation rate to ensure only students with the most significant cognitive disabilities take the AA-AAAS

The low incidence consultants within the special education regional cooperatives are continuing to provide additional training, coaching and support around the following areas related to the P4AA Project:

- overview of alternate assessment participation guidelines:
 - eligibility criteria
 - documentation requirements
 - data analysis and application
- alternate assessment eligibility and participation guidelines completion for related service personnel
- differentiated learning (including regular education/content area training)
- social studies and alternate assessment networking
- strategies for developing writing pieces with students on the alternate assessment
- increasing literacy access for all students- developing instructional materials around an adapted book and how to adapt books for students participating in alternate assessment, making grade-level content area reading more accessible for all students
- using the IEP for improving outcomes for students with disabilities
- structured literacy/differentiating literacy and accommodations and/or modifications in instruction and assessment

- promoting membership and participation in the general education setting for students with disabilities
- alternate assessment College and Career Readiness (CCR) course development and instructional planning and for accountability measures
- job coaches: strategies for working with students with complex needs
- explicit instruction overview
- meeting the needs of all math learners: teaching fraction operations, fraction sense and beyond to students with mild to moderate to severe disabilities
- guided reading 101 instruction for special educators
- core vocabulary communication boards for students across the school age span
- poverty and equity: removing barriers to provide students with a safe, challenging, and supportive learning environment – focusing on students with disabilities and cultural differences

The KDE believes its 2018-2019 training plan outlined below will further reduce the percentage of students participating in the AA-AAAS to meet the 1.0 percent statewide goal set by ESSA.

Training Plan

- identifying districts with more than 1.0 percent of students taking the AA-AAAS;
- providing training, coaching, technical assistance, support and oversight to districts to ensure appropriate decisions for participation in the AA-AAAS are made by ARCs;
- addressing district and state needs regarding disproportionality among subgroups participating in the AA-AAAS; and
- monitoring districts with more than 1.0 percent of their students participating in the AA-AAAS

(C) The State will address any disproportionality in the percentage of students taking an alternate assessment aligned with alternate academic achievement standards as identified through the data provided in accordance with paragraph (c)(4)(ii)(A) of this section;

The KDE determined the statewide level of disproportionality of students participating in the alternate assessment by subgroup and content area for the 2016-2017 school year. Data were reviewed for each of the subgroups and content areas, the KDE found that the subgroup with overwhelming disproportionality are those eligible for free or reduced price meal in the content areas of reading and math.

The KDE determined whether a subgroup has disproportionate participation in the AA-AAAS by using a risk ratio analysis. The risk ratio method is the same analysis used by the KDE in determining disproportionate representation for Indicators 9 and 10 in its Annual Performance Report (APR). This risk ratio method is described beginning on page 35 of the [IDEA FFY 2015 APR](#). The KDE targeted risk ratios exceeding 2.0 to identify districts with disproportionality in alternate assessment participation among subgroups. Due to the high level of disproportionality among the free and reduced lunch subgroup the KDE focused on calculations and analysis of this subgroup in the content areas of reading and math.

In addition, the disproportionality in the percentage of students taking an alternate assessment the KDE collaborated with the AADAG to develop a targeted monitoring process as described in [Section \(B\)](#) of this document.

The KDE will continue to address disproportionality in the percentage of students taking an AA-AAAS through statewide data analysis, district level data analysis and the targeted monitoring process described previously.