

Illinois State Board of Education

Special Education
Department

**ALTERNATE ASSESSMENT:
1 PERCENT THRESHOLD
WAIVER REQUEST SCHOOL
YEAR 2024-25**

December 2024

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Introduction

Title 1 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA) of 2015 [ESEA §111(b)(2)(D) and 34 CFR 200.6(c) and (d)], modifies the provision that students with the most significant cognitive disabilities may participate in alternate assessments based on alternate academic achievement standards. The Every Student Succeeds Act (ESSA) places a 1 percent cap on the number of students who may participate in alternate assessments. States that anticipate exceeding the 1 percent cap must submit a waiver request to the U.S. Department of Education (ED).

The Illinois State Board of Education (ISBE) utilizes the Dynamic Learning Maps Alternate Assessment (DLM-AA) as its alternate assessment. DLM-AA participation rates for 2023-24 were 1.16 percent for English language arts (ELA), 1.16 percent for mathematics, and 1.04 percent for science. Based on these data, ISBE anticipates exceeding the 1 percent cap for the 2024-25 DLM-AA administration in these three subjects and is submitting the required waiver request.

One Percent Threshold Waiver Request Requirements

Submission 90 Days Prior to the State Testing Window

The ISBE spring testing window begins in March 2025. ISBE is submitting its 1 percent threshold and 95 percent participation requirement waiver request to ED for the areas ELA, mathematics, and science on December 16, 2024.

State Measured Achievement of at Least 95% of Students

Illinois met the 95 percent participation requirement for all students and for students in ELA, mathematics, and science in the 2023-24 school year, as illustrated in Table 1. Illinois also met the 95 percent participation requirement for students with disabilities in ELA and mathematics in the 2023-24 school year. However, only 92.66% of students with disabilities participated in the science assessment.

Table 1: Overall Rates of Assessment Participation for SY 2023-24

Student Subgroup	All Students Grades 3-8 & 11	Students with Disabilities Grades 3-8 & 11
English Language Arts		
Students Assessed	937,661	144,502
Students Enrolled	952,139	149,633
Assessment Participation Rate	98.48%	96.57%
Mathematics		
Students Assessed	935,322	143,979
Students Enrolled	950,744	149,434
Assessment Participation Rate	98.38%	96.35%
Science		
Students Assessed	397,046	57,167
Students Enrolled	414,066	61,697
Assessment Participation Rate	95.89%	92.66%

State-Level Data for Alternate Assessment Participation Rates

Table 2 illustrates ISBE's state-level data for the number and percentage of students in each subgroup who participated in the statewide alternate assessment for the 2023-24 academic year.

Table 2: Alternate Assessment Aligned to Alternate Academic Standards (AA-AAAS) Participation Rates by Subgroup for SY 2023-24

Student Subgroup	# of Students Assessed in Grades 3-8 & 11*	Total # of Students Assessed in Grades 3-8 & 11	Percent Taking AA-AAAS in Grades 3-8 & 11
All	952,139	11,048	1.16%
American Indian or Alaska Native	2,241	24	1.07%
Asian	54,495	632	1.16%
Native Hawaiian or Other Pacific Islander	878	16	1.82%
Black or African American	154,919	2,624	1.69%
Hispanic or Latino	270,238	3,177	1.18%
White	429,549	4,120	0.96%
Two or More Races	41,949	464	1.11%
English Learners	156,885	3,066	1.95%
Economically Disadvantaged	488,393	7,145	1.46%
Male	488,210	7,418	1.52%
Female	463,633	3,630	0.78%

State Alternate Assessment Participation Rate by Subject Over Time

Table 3 demonstrates ISBE’s alternate assessment participation rate data in ELA, mathematics, and science from the inception of the waiver program during the 2017-18 school year through the 2023-24 school year. There was a slight increase in the alternate assessment participation rates in ELA and math. The alternate assessment participation rate for science decreased from 1.06 percent to 1.04 percent during the 2023-2024 school year. Some of the rates increased, but IBSE has been working to make significant changes to our monitoring processes that we believe will result in a decrease in participation rates in the coming year.

Table 3: AA-AAAS Rates by Subject, by Year

School Year	ELA	Math	Science
2017-18	Data unavailable		
2018-19	1.10%	1.11%	1.10%
2019-20	Testing suspended due to COVID-19 pandemic		
2020-21	1.02%	1.03%	1.04%
2021-22	1.14%	1.14%	1.12%
2022-23	1.15%	1.14%	1.06%
2023-24	1.16%	1.16%	1.04%

State-Level Longitudinal Enrollment and Assessment Data

One factor that continues to impact Illinois’ performance in reducing the alternate assessment participation rate is decreasing enrollment. Table 4 displays the longitudinal enrollment data for Illinois. Enrollment in Illinois public schools has decreased 7.51 percent over the last seven years. However, the number of students with the most

significant disabilities has remained relatively constant. This drop in enrollment impacts the calculation of the alternate assessment participation rate. A smaller denominator (due to decreasing enrollment) with little change in the numerator results in higher participation rates.

Table 4: Student Enrollment in Illinois by School Year, 2018-19 through 2023-24

Year	Total Enrollment	Difference SY to SY (Decrease)
2017-18	2,001,529	--
2018-19	1,984,519	17,010 (0.85%)
2019-20	1,957,018	27,501 (1.39%)
2020-21	1,887,316	69,702 (3.56%)
2021-22	1,869,325	17,991 (0.95%)
2022-23	1,857,790	11,535 (0.62%)
2023-24	1,851,290	6,500 (0.35%)

State Assurances the LEAs followed State Alternate Assessment Participation Guidelines

Local Education Agencies (LEAs) were made aware of changes to the 1 percent exception rule in 2018 via conference presentations that were held throughout Illinois. ISBE posted the alternate assessment participation guidelines on its website and conducted webinars and presentations to make clear that all students who are being considered for the alternate assessment must have the participation guidelines within their Individualized Educational Programs (IEPs).

ISBE sent formal identification letters to LEAs identified as above the 1 percent threshold on November 22, 2024. ISBE identified 409 LEAs that exceeded the 1 percent cap in 2023-24. A little more than half of the identified LEAs were above the 1% threshold for three consecutive years (n=230). Seventeen percent (n=70) of those identified were above the 1 percent threshold for the first time during the three-year cycle. All LEAs above the 1 percent threshold were required to complete our justification and assurances form by December 13, 2024. This information will be posted to the ISBE Alternate Assessment Participation -- 1 % Threshold webpage by the end of December.

The LEAs and student population in Illinois are diverse in composition. Size, location, and availability of resources all impact an LEA's alternate assessment participation rate. ISBE's justification and assurances form asks LEAs to document all factors that impact their alternate assessment participation rate.

The most frequent justification that has been noted in the past is district size. Illinois has 866 LEAs, 3,835 schools, and 1,851,290 enrolled students. Communities fall into three categories -- rural, suburban, or urban. Chicago Public Schools had the third-largest student enrollment in the United States in 2021, according to the National Center for Education Statistics. Only 631 of the remaining LEAs in Illinois have student populations of more than 1,000. Seventy-seven percent of Illinois LEAs serve 500 or fewer students and 6 percent serve fewer than 100 students. This data is from the 2023-24 Illinois Report Card. Even small changes to student enrollment and alternate assessment participation numbers can have a significant impact on the alternate assessment participation rate for these small districts.

The availability of school and community resources also impacts alternate assessment participation rates for many LEAs. Districts that have developed outstanding educational programs for students with significant disabilities tend to draw families of students with the most significant cognitive disabilities to the area. Also, districts near areas with specialized community resources, such as medical programs or therapeutic day schools, often draw families of students who need to access these resources. These relocation trends result in disproportionately high numbers of students needing to take the alternate assessment in these areas.

Regardless of the justification for being above the 1 percent cap, LEAs must ensure they are:

- Utilizing the alternate assessment participation guidelines,
- Training appropriate staff on participation guidelines and administering the alternate assessment,
- Addressing identified disproportionality, and
- Informing IEP teams they must discuss the long-term impacts of taking the alternate assessment annually.

ISBE supports LEAs identified as being above the 1 percent threshold by:

- Providing resources and guidance to use their data to identify the root causes of being above 1 percent;
- Appropriately identifying students for the alternate assessment using the alternate assessment participation guidelines;
- Developing goals to address areas of concern, when appropriate; and
- Documenting the internal evaluation process and decision-making practices.

State Assurances that LEAs Will Address Disproportionality of Subgroups

ISBE will provide LEAs above the 1 percent threshold with technical assistance related to a risk ratio approach to analyze alternate assessment participation data for disproportionality for all subgroups of students. As part of the justification and assurances process, LEAs commit to addressing disproportionality in subgroup participation based on inappropriate policies, practices, and procedures utilizing ISBE technical assistance, resources, and supports. Furthermore, LEAs above the 1 percent threshold for three consecutive years must address disproportionality within their LEA Action Plans.

Below is the list of subgroups included in the risk ratio analysis:

1. Racial/Ethnic Groups
 - a. American Indian or Alaska Native
 - b. Asian
 - c. Pacific Islander or Other Pacific Islander
 - d. Black or African American
 - e. Hispanic or Latino
 - f. White (Non-Hispanic)
 - g. Two or More Races (Multiracial not Hispanic)
2. Disability
3. Limited English Proficient
4. Socio-Economic Status
5. Gender
 - a. Male

b. Female

ISBE also analyzes the primary and secondary eligibilities of each DLM-AA participant to ensure only students with the most significant cognitive disabilities are found eligible to take the DLM-AA.

The risk analysis will allow LEAs to determine if any subgroup is more likely than other subgroups to participate in the alternate assessment. Analysis of these data will provide LEAs with information so they can focus on reducing disproportionality in the participation of students in the alternate assessment for individual subgroups. Information that is collected through the risk analysis will provide additional data that will be used to address the overall percentage of students participating in the alternate assessment.

The risk ratio compares the risk of participating in the alternate assessment for each subgroup to the risk for all other students at the LEA level. A risk ratio of 1.0 for a subgroup means that the rate of participation in the alternate assessment is proportionate by students in the subgroup to the rate of participation for students not in the subgroup. The higher the risk ratio, the greater the chance that students in the subgroup will participate in the alternate assessment as compared to students not in the subgroup.

ISBE uses the following formula to calculate the risk ratio for each subgroup:

- A. The risk of participating in the alternate assessment by students in the subgroup: The number of students in the subgroup who participated in the alternate assessment divided by the number of students in the subgroup who participated in statewide assessments multiplied by 100.
- B. The risk of participating in the alternate assessment by all other students (comparison group): The number of students in the comparison group who participated in the alternate assessment divided by the number of students in the comparison group who participated in statewide assessments multiplied by 100.
- C. The risk ratio for the subgroup: The risk of the subgroup (A) divided by the risk of the comparison group (B).

ISBE also will provide technical assistance that allows LEAs to evaluate alternate assessment participation data by disability category. ISBE uses the following:

1. Disability Category
 - a. Intellectual Disability
 - b. Orthopedic Impairment
 - c. Specific Learning Disability
 - d. Visual Impairment
 - e. Hearing Impairment
 - f. Deafness
 - g. DeafBlind
 - h. Speech and/or Language Impairment
 - i. Emotional Disability
 - j. Other Health Impaired
 - k. Multiple Disabilities
 - l. Developmental Delay

- m. Autism
- n. Traumatic Brain Injury

State Plan and Timelines

The ISBE plan for addressing issues related to exceeding the 1 percent cap on alternate assessments participation rates includes short- and long-term activities, some of which have already occurred.

ISBE uses three years of finalized data to determine how much support to provide LEAs above the 1 percent threshold and which activities they must complete. We reviewed finalized data from school years 2021-22, 2022-23, and 2023-24 during the 2024-25 monitoring cycle. LEAs identified as being above the 1 percent threshold during the 2023-24 school year were assigned Level 1 supports and activities. LEAs identified as being above the 1 percent threshold for two consecutive years (2022-23 and 2023-24) were assigned Level 2 supports and activities. LEAs identified as being above the 1 percent threshold for three consecutive years (2021-22 through 2023-24) were assigned Level 3 supports and activities. Table 5 describes the supports and activities for each level.

Table 5: Monitoring Supports and Activities by Level

Level	Supports	Activities
1	<ul style="list-style-type: none"> • Assigned principal consultant to answer questions • Professional learning event at the beginning of the cycle (January) • Guidance documents and resources 	<ul style="list-style-type: none"> • Complete justification and assurances form
2	<ul style="list-style-type: none"> • Assigned principal consultant to answer questions • Professional learning event each quarter (January, April, July, October) • Guidance documents and resources 	<ul style="list-style-type: none"> • Complete justification and assurances form
3	<ul style="list-style-type: none"> • Assigned principal consultant to answer questions • Professional learning event monthly January through November (no August meeting) • Guidance documents and resources 	<ul style="list-style-type: none"> • Complete justification and assurances form • LEA Action Plan

All LEAs with alternate assessment rates above the 1 percent threshold are required to complete a justification and assurances form. A total of 296 of the LEAs that were identified completed the form. These responses are available upon request.

ISBE noted that LEAs had difficulty completing the form in a timely manner during the 2023-24 cycle. Districts were not notified that they were above the 1 percent threshold until February, and LEAs did not submit the form promptly after they were notified. ISBE fully understands that LEAs must complete the assurances before we submit our waiver and has therefore developed a communication plan to address this requirement. The justification and assurances form for the 2024-25 school year must be completed by LEAs no later than December 16, 2024. ISBE began sharing this deadline at the Illinois Alliance of Administrators of Special Education (IAASE) Conference in October. LEA superintendents and state-approved special education directors will be notified if they are above the 1 percent threshold by November 22, 2024 and that notification will inform them of the deadline for completing the justification and assurances form. A reminder communication will be sent one week before the due date.

The justification and assurances form was amended for the 2024-25 monitoring cycle to address the long-term impacts of taking the alternate assessment. LEAs must now ensure that IEP teams, parents, and students are aware of the long-term impact of taking the alternate assessment, including graduation exit requirements. LEAs also must ensure that they are completing the alternate assessment participation guidelines form every time eligibility for the alternate assessment is considered. See Appendix B to view the justification and assurances form.

LEAs receiving Level 3 support must complete an LEA Action Plan. ISBE revised the LEA Action Plan for the 2024-25 school year. The questions are the same, but the format of the form changed and was condensed into two sections to make it easier for LEAs to use. This document is intended to be a living document that LEAs add to and revise throughout the cycle. It should document the process the LEA follows. See Appendix C to view the LEA Action Plan template.

ISBE noted during the 2023-24 monitoring cycle that accessing and interpreting data was a challenge for many of its districts. To address this, ISBE will be using its professional learning events:

- To provide technical assistance that helps LEAs examine root causes of exceeding the alternate assessment cap,
- To locate and use their data to internally monitor their alternate assessment participation rate, and
- To assess and address disproportionality.

Last year only LEAs receiving Level 3 support were required to attend monthly meetings. All LEAs above the 1 percent threshold must attend at least one professional learning event during the 2024-25 cycle. Level 1 support requires attendance at one event and Level 2 support requires attendance at quarterly events. The professional learning events are one hour long. There will be a morning and afternoon meeting option offered this cycle to accommodate participants' busy schedules. These learning events are recorded and posted on ISBE's Alternate Assessment Participation – 1% Threshold webpage. ISBE principal consultants will also establish office hours to allow individualized supports for LEAs above the 1 percent threshold.

Table 6: SY 2024-25 Monitoring Cycle Timeline

Timeline	Action
Spring 2024	<ul style="list-style-type: none"> • Ongoing work with National Center on Educational Outcomes (NCEO): ISBE joined a consortium of states in the NCEO 1 percent working group initially in 2018. As new ISBE staff have been assigned to monitor LEAs that exceed the 1 percent threshold, renewed participation with this project has resulted in improved strategies and activities to help LEAs.
October 2024	<ul style="list-style-type: none"> • Justification and assurances form updated. • LEA Action Plan form revised. • ISBE began to draft a state request to exceed the 1 percent cap. • Technical assistance presentation addressing participation guidelines and monitoring activities presented at the IAASE Conference.
November 2024	<ul style="list-style-type: none"> • Alternate assessment participation guidelines form updated and finalized. • Participation decision-making tool developed and finalized. • Communication templates and resources reviewed/drafted and finalized. • 2023-24 finalized alternate assessment data available. • 409 LEAs identified as above the 1 percent threshold. • ISBE determined level of support for each LEA based on three-year finalized data. • Draft of the 2024-25 waiver request posted for public comment on November 21, 2024. Public comment closed on November 29, 2024. • Technical assistance presentation addressing participation guidelines and monitoring activities presented at the 2024 Proficio Conference (a conference for nonpublic educational facilities). • Notification letters sent to identified LEAs on November 22, 2024. • Beginning in November, ISBE analyzed IEP status and primary disability category for students rostered for the 2025 spring alternate assessment twice a month. If discrepancies are identified, ISBE will provide guidance to the district and verify that IEP amendments are completed.
December 2024	<ul style="list-style-type: none"> • Responded to public comments on the waiver and included it in the waiver application by December 6, 2024. • Deadline for all districts identified as exceeding the 1 percent threshold to submit their justification and assurances form was December 13, 2024. • Final waiver submitted to ED on December 16, 2024.
January 2025	<ul style="list-style-type: none"> • Mass communication will be used to remind LEAs of an upcoming professional learning event. • Professional learning event for all districts identified as about the 1 percent threshold held on January 14. LEAs may attend at either 10 a.m. or 1 p.m. • Professional learning event to address justification and assurances, participation guidelines, IEP documentation, disproportionality and risk ratio, and monitoring activities and deadlines. • LEAs assigned to Level 3 support are assigned to develop an LEA Action Plan before the professional learning event planned for February.

February 2025	<ul style="list-style-type: none"> • In February, ISBE will analyze IEP status and primary disability category for students rostered for the 2025 spring alternate assessment weekly until the testing window opens. If discrepancies are identified, ISBE will provide guidance to the district and verify that IEP amendments are completed. • Mass communication will be used to remind LEAs of an upcoming professional learning event. • Professional Learning event for LEAs assigned Level 3 support will be held on February 18. LEAs may attend at either 10 a.m. or 1 p.m. • LEA Action Plans will be discussed at the professional learning event. Several good examples will be provided. Brainstorm activities and deliverables. • LEAs assigned to Level 3 support must submit their LEA Action Plan to altexception@isbe.net by February 28, 2025.
March 2025	<ul style="list-style-type: none"> • March 1, 2025, spring testing window opens. • Mass communication will be used to remind LEAs of an upcoming professional learning event. • Professional learning event for LEAs assigned Level 3 support will be held on March 18. LEAs may attend at either 10 a.m. or 1 p.m.
April 2025	<ul style="list-style-type: none"> • Testing window remains open. • Mass communication will be used to remind LEAs of an upcoming professional learning event. • Quarterly professional learning event for LEAs assigned to Level 2 and Level 3 support will be held on April 22. LEAs may attend at either 10 a.m. or 1 p.m. • Professional learning event to address finding, reviewing, and using data. Districts will be assigned to look up data from the previous school year to use during this session.
May 2025	<ul style="list-style-type: none"> • ISBE to review business rules and amend, as appropriate. • Testing window closes. • Mass communication will be used to remind LEAs of an upcoming professional learning event. • Professional learning event for LEAs assigned Level 3 support will be held on May 20. LEAs may attend at either 10 a.m. or 1 p.m.
June 2025	<ul style="list-style-type: none"> • Technical assistance presentation addressing participation guidelines and monitoring activities presented at the 2025 State Special Education Directors Conference. (Date to be determined) • Mass communication will be used to remind LEAs of an upcoming professional learning event. • Professional learning event for LEAs assigned Level 3 support will be held on June 17. LEAs may attend at either 10 a.m. or 1 p.m. • Professional learning event to cover establishing effective and consistent policies, procedures, and practices.
July 2025	<ul style="list-style-type: none"> • Mass communication will be used to remind LEAs of an upcoming professional learning event. • Quarterly professional learning event for LEAs assigned to Level 2 and Level 3 support will be held on July 22. LEAs may attend at either 10 a.m. or 1 p.m.

	<ul style="list-style-type: none"> Professional learning event to cover evaluating preliminary test data and making corrections in the Student Information System (SIS).
August 2025	<ul style="list-style-type: none"> August 22, 2025, window for AA-AAAS corrections in SIS closes. School year 2025-26 begins. NO professional learning events will be held to allow for administrators to be present with their students and staff in the first few weeks of school.
September 2025	<ul style="list-style-type: none"> ISBE begins preparing for next cycle by reviewing preliminary data; reviewing and updating resources and documents; and beginning draft of waiver, if appropriate. Mass communication will be used to remind LEAs of an upcoming professional learning event. Professional learning event for LEAs assigned Level 3 support will be held on September 16. LEAs may attend at either 10 a.m. or 1 p.m. Professional learning event to involve discussion about completing and documenting LEA Action Plan activities and artifacts/deliverables. Effectiveness of the plan also will be evaluated.
October 2025	<ul style="list-style-type: none"> Mass communication will be used to remind LEAs of an upcoming professional learning event. Quarterly professional learning event for LEAs assigned to Level 2 and Level 3 support will be held on October 21. LEAs may attend at either 10 a.m. or 1 p.m. Professional learning event to review identifying students using participation guidelines, what is required as part of an IEP, and documenting decisions. LEA Action Plan with completed activities and deliverables due October 31, 2025.
November 2025	<ul style="list-style-type: none"> Mass communication will be used to remind LEAs of an upcoming professional learning event. FINAL professional learning event for LEAs assigned Level 3 support will be held on November 18. LEAs may attend at either 10 a.m. or 1 p.m. Finalized 2024-25 data available. Identify and notify LEAs above the 1 percent threshold for the 2025-26 monitoring cycle. Determine level of support for LEAs above the 1 percent threshold for the 2025-26 monitoring cycle. If necessary, post draft of the 2025-26 waiver request for public comment.

Public Comment

Appendices

Appendix A: Correspondence Templates

Notification Letters

LEA Action Plan Acceptance Letter

Alternate Assessment 1 Percent Threshold Monitoring Closing Letter

Appendix B: [Justification and Assurances Form](#)

Appendix C: [LEA Action Plan Template](#)

Appendix D: [Alternate Assessment Participation Guidelines Form](#)

Appendix E: Resources for LEAs

ISBE [Special Education Alternate Assessment Participation – 1% Threshold](#) Webpage

[Alternate Assessment Eligibility Decision-Making Tool](#)

[Alternate Assessment 1 Percent Threshold Guidance Document](#)

[Frequently Asked Questions Alternate Assessment 1 Percent Threshold Frequently Asked Questions](#)

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