

November 1, 2025

Oklahoma State Department of Education (OSDE)

Public Notice and Comment Period

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

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

Oklahoma was granted a waiver for the 2024-2025 school year. The Oklahoma State Department of Education (OSDE) is requesting from the Secretary for the United States Department of Education an extension of the waiver of the 1.0 percent cap in ESEA section 1111(b)(2)(D)(i)(I) on the number of students who participate in alternate assessments aligned with alternate academic achievement standards (AA-AAAS) for the 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](mailto:Abby.Johnson@sde.ok.gov). Public comments must be submitted no later than 5:00 pm Monday, December 1, 2025.

## 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, 2026, through May 14, 2026. OSDE will submit a waiver request to the U.S. Department of Education for the subject areas of math, ELA, and science prior to Tuesday, December 24, 2025.</p> <ul style="list-style-type: none"> <li>• Date that is 90 days prior to the start date for the OAAP: December 24, 2025.</li> <li>• OAAP Year-End Operational Window (required) is March 24, 2026, through May 14, 2026.</li> <li>• Instructionally Embedded (IE) assessments are for instructional purposes and are optional for LEAs. The IE window is September 9, 2025, through February 21, 2026.</li> <li>• The OAAP testing schedule is disseminated through the Special Education Listserv and is posted to the <a href="#">OAAP webpage</a>.</li> <li>• A memo detailing the testing schedules was sent to the LEAs through the Special Education Listserv on August 27, 2025 (Requirement 1 Attachment).</li> </ul>

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

**2024-2025 Oklahoma Student Participation in ELA by Subgroup**

Subgroup	Number participating in statewide assessment (ELA) 2025	Number participating in the OAAP (ELA) 2025	Percent participating in the OAAP (ELA) 2025
All students	351065	4796	1.37%
Black	26904	596	2.22%
White	153112	1957	1.28%
Hispanic	74370	973	1.31%
Economically disadvantaged	217878	3872	1.78%
English Learner	39166	580	1.48%
Homeless	9371	174	1.86%
Asian	8646	141	1.63%
Hawaiian/Pacific Islander	1705	36	2.11%
Two or More Races	49308	665	1.35%
American Indian/Alaskan Native	37018	428	1.16%
Male	180204	3166	1.76%
Female	170859	1630	0.95%

**2024-2025 Oklahoma Student Participation in Math by Subgroup**

Subgroup	Number participating in statewide assessment (Math) 2025	Number participating in the OAAP (Math) 2025	Percent participating in the OAAP (Math) 2025
All students	350870	4796	1.37%
Black	26888	596	2.22%
White	153018	1959	1.28%
Hispanic	74312	974	1.31%
Economically disadvantaged	217684	3872	1.78%
English Learner	39134	581	1.48%
Homeless	9352	174	1.86%
Asian	8648	141	1.63%
Hawaiian/Pacific Islander	1701	36	2.12%
Two or More Races	49302	663	1.34%
American Indian/Alaskan Native	36999	427	1.15%
Male	180086	3166	1.76%
Female	170782	1630	0.95%

**2024-2025 Oklahoma Student Participation in Science by Subgroup**

Subgroup	Number participating in statewide assessment (Science) 2025	Number participating in the OAAP (Science) 2025	Percent participating in the OAAP (Science) 2025
All students	150127	1930	1.29%
Black	11325	230	2.03%
White	66322	845	1.27%
Hispanic	31780	379	1.19%
Economically disadvantaged	90106	1548	1.72%
English Learner	15460	212	1.37%
Homeless	3869	72	1.86%
Asian	3608	52	1.44%
Hawaiian/Pacific Islander	678	14	2.06%
Two or More Races	20494	223	1.09%
American Indian/Alaskan Native	15919	187	1.17%
Male	76984	1250	1.62%
Female	73141	680	0.93%

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

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

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

OSDE Response	Supporting Evidence
<p>OSDE-SES 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"> <li>• IEP teams followed the state’s <a href="#"><u>Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments</u></a></li> <li>• IEP teams are correctly identifying students with the most significant cognitive disabilities based on the evidence in the <a href="#"><u>Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments</u></a></li> <li>• IEP teams are informing parents/guardians of the implications associated with their child being assessed on the alternate assessment (Parent Brochure)</li> <li>• IEP teams have completed the <a href="#"><u>Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments</u></a> in our online IEP platform</li> </ul> <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"> <li>• Calculating and analyzing participation rates among subgroups at the state and district levels;</li> <li>• Identifying subgroups over-represented in the DLM participation counts;</li> <li>• Reviewing district justifications and data to identify unusual patterns and high participation rates across subgroups;</li> <li>• 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.</li> </ul> <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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>

- 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.

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

- 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.
- The Special Education Checklist has a new required parental consent to participate in the

	<p>alternate assessment in alignment with Oklahoma Statute and 34 C.F.R. § 300.9(a)(1) The parent understands that the granting of consent is voluntary on the part of the parent and may be revoked at any time.</p> <ul style="list-style-type: none"> <li>• A bimonthly 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.</li> <li>• 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)</li> <li>• The Oklahoma state-defined alternate diploma and the rollout of a tiered monitoring process, along with the review of the student confidential records (issuance of noncompliance reports with corrective action plans for all tiers), have presented valuable learning opportunities for our LEAs. As a result of these initiatives, we have observed a continued decline in our OAAP data. OSDE will reevaluate our implementation plan following the 2025-2026 school year to ensure we</li> </ul>
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	<p>continue to make progress toward being under 1 percent.</p>
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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 <a href="#">OAAP webpage</a>.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 2024-2025: The Special Education Office and the Office of Assessment identified the need to monitor a sampling of 2-3 files for each LEA that has exceeded the 1% cap. The OSDE then issued a report of the findings with</li> </ul>



	<p>corrective action plans.</p> <p>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)</p> <p><b>Newly Identified Districts:</b></p> <p><b>Tier 1:</b></p> <ul style="list-style-type: none"> <li>• Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment.</li> <li>• Complete the 1.0% Toolkit.</li> <li>• OSDE will monitor each LEAs alternate assessment IEPs and issue a report of findings with a corrective action plan.</li> </ul> <p><b>Tier 2:</b></p> <ul style="list-style-type: none"> <li>• Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment.</li> <li>• Complete the 1.0% Toolkit.</li> <li>• OSDE will monitor each LEAs alternate assessment IEPs and issue a report of findings with a corrective action plan.</li> </ul> <p><b>Tier 3:</b></p> <ul style="list-style-type: none"> <li>• Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment.</li> <li>• Complete the 1.0% Toolkit.</li> <li>• OSDE will monitor each LEAs alternate assessment IEPs and issue a report of findings with a corrective action plan.</li> </ul>
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	<p><b>Previously Identified Districts (2024-2025 SY):</b></p> <p><b>Tier 1:</b></p> <ul style="list-style-type: none"><li>• Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment.</li><li>• Complete the 1.0% Toolkit.</li><li>• OSDE will monitor each LEAs alternate assessment IEPs and issue a report of findings with a corrective action plan.</li></ul> <p><b>Tier 2:</b></p> <ul style="list-style-type: none"><li>• Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment.</li><li>• Complete the 1.0% Toolkit.</li><li>• OSDE will monitor each LEAs alternate assessment IEPs and issue a report of findings with a corrective action plan.</li></ul> <p><b>Tier 3:</b></p> <ul style="list-style-type: none"><li>• Complete the Professional Development Module on the 1.0% criteria and implications of assessing students on the alternate assessment.</li><li>• Complete the 1.0% Toolkit.</li><li>• OSDE will monitor each LEAs alternate assessment IEPs and issue a report of findings with a corrective action plan.</li></ul>
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	<p><b>Previously Identified Districts:</b></p> <p><b>Tier 1:</b></p> <ul style="list-style-type: none"> <li>• The district will receive a notification letter of their tiered status with information on completing IEP file reviews.</li> </ul> <p><b>Tier 2:</b></p> <ul style="list-style-type: none"> <li>• The district will receive a notification letter of their tiered status with information on completing IEP file reviews.</li> <li>• 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.</li> <li>• OSDE will review the submitted documents to ensure districts are following OAAP placement criteria and provide targeted support if needed.</li> </ul> <p><b>Tier 3:</b></p> <ul style="list-style-type: none"> <li>• The district will receive a notification letter of their tiered status with information on completing IEP file reviews.</li> <li>• 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.</li> <li>• OSDE will review the results of monitoring with each LEA via a virtual meeting, phone call, or email.</li> </ul>
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**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"> <li>• Districts will be notified if disproportionality exists in their district. (Requirement 4 [C], Attachment 1)</li> <li>• Districts will be asked to reflect on their disproportionality by answering the following questions: <ul style="list-style-type: none"> <li>-What subgroups in your district have the largest discrepancy between participants of the general assessment and the alternate assessment?</li> <li>-When looking at subgroup discrepancies, what hypotheses can be found?</li> <li>-What problem-solving actions will the district take to address the identified hypotheses?</li> </ul> </li> <li>• 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.</li> <li>• 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>.</li> </ul>

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
<b>2025</b>	State Total	Math	4796	350870	1.36%
<b>2025</b>	State Total	Reading	4796	351065	1.36%
<b>2025</b>	State Total	Science	1930	150127	1.28%
<b>2024</b>	State Total	Math	4734	350281	1.35%
<b>2024</b>	State Total	Reading	4734	350598	1.35%
<b>2024</b>	State Total	Science	1945	150150	1.30%
<b>2023</b>	State Total	Math	5059	349624	1.45%
<b>2023</b>	State Total	Reading	5062	349916	1.45%
<b>2023</b>	State Total	Science	2054	148707	1.38%
<b>2022</b>	State Total	Math	5248	355523	1.48%
<b>2022</b>	State Total	Reading	5250	355551	1.48%
<b>2022</b>	State Total	Science	2146	150176	1.43%
<b>2021</b>	State Total	Math	5095	326829	1.56%

<b>2021</b>	State Total	Reading	5097	327355	1.56%
<b>2021</b>	State Total	Science	2114	137639	1.54%

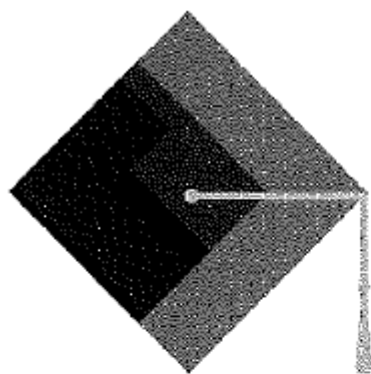
<b>2020</b>	State Total	Math	N/A	N/A	N/A
<b>2020</b>	State Total	Reading	N/A	N/A	N/A
<b>2020</b>	State Total	Science	N/A	N/A	N/A
<b>2019</b>	State Total	Math	5779	350827	1.65%
<b>2019</b>	State Total	Reading	5797	351088	1.65%
<b>2019</b>	State Total	Science	2336	144474	1.62%
<b>2018</b>	State Total	Math	5747	345792	1.66%
<b>2018</b>	State Total	Reading	5759	345476	1.67%
<b>2018</b>	State Total	Science	2293	144879	1.58%
<b>2017</b>	State Total	Math	5840	346763	1.68%
<b>2017</b>	State Total	Reading	5852	346316	1.69%
<b>2017</b>	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, the SDE review of student confidential records with a report of findings, 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: This will be updated once the public comment period is completed.

# Supporting Documentation



# 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

OK IEP

Date this IEP Begins: \_\_\_\_\_ Date this IEP Ends: \_\_\_\_\_

Name of Student: \_\_\_\_\_ District/Agency: \_\_\_\_\_

Student Testing Number (STN): \_\_\_\_\_

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

OAAP PARTICIPATION CRITERIA CHECKLIST	YES	NO
Does the student have significant intellectual disabilities <b>AND</b> significant adaptive behavior deficits?	<input type="checkbox"/>	<input type="checkbox"/>
Does the student’s IEP require alternate achievement standards in <b>ALL</b> content areas?	<input type="checkbox"/>	<input type="checkbox"/>
Does the IEP team believe extensive family/community support(s) will be a <b>lifelong requirement</b> , 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 <b>NOT</b> on excessive absences, language, social, cultural, or economic differences <b>OR</b> administration reasons such as the student is expected to perform poorly on the regular assessment, the student displays disruptive behaviors, or the student experiences emotional distress during testing.	<input type="checkbox"/>	<input type="checkbox"/>

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

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

☐ Does Consent (I understand my child **will** participate in the OAAP) \_\_\_\_\_ Date: \_\_\_\_\_

\*Parent/Guardian Signature

☐ Does **NOT** Consent (I understand my child **will NOT** participate in the OAAP) \_\_\_\_\_ Date: \_\_\_\_\_

\*\*Parent/Guardian Signature

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

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



# OKLAHOMA

## State Department of Education

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

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

LEA Agreement ▼

[Printer-Friendly](#)

[Click to Return to Organization Select](#)

[Click to Return to GMS Access/Select Page](#)

[Click to Return to Menu List / Sign Out](#)

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

<a href="#">Overview</a>	<a href="#">Contact Information</a>	<a href="#">Cooperative Interlocal</a>	<a href="#">Maintenance of Effort</a>	<a href="#">Forms</a>	<a href="#">Agreement</a>	<a href="#">Other</a>	<a href="#">Specific Learning Disabilities</a>	<a href="#">Personnel Development</a>	<a href="#">Discipline Policies/Procedures</a>	<a href="#">GEPA</a>	<a href="#">Submit</a>	<a href="#">Agreement Print</a>
<a href="#">Agreement Part 1</a>				<a href="#">Agreement Part 2</a>				<a href="#">Agreement Summary</a>				
<a href="#">FAPE</a>	<a href="#">FAPE Part 2</a>	<a href="#">Child Find</a>	<a href="#">Participation in Assessments</a>				<a href="#">Personnel Development Agreement</a>				<a href="#">Charter Schools</a>	

### Participation in Assessments

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

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

#### 34 CFR § 300.160 Participation in Assessments.

- (A) General. A State must ensure that all children with disabilities are included in all general State and district-wide assessment programs, including assessments described under section 1111 of the ESEA, 20 U.S.C. 6311, with appropriate accommodations and alternate assessments, if necessary, as indicated in the respective 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.
  - (2) For assessing the academic progress of students with disabilities under Title I of the ESEA, the alternate assessments and guidelines in paragraph (c)(1) of this section must provide for alternate assessments that -
    - (i) Are aligned with the State's challenging academic content standards and challenging student academic achievement standards;
    - (ii) If the State has adopted modified achievement standards permitted in 34 CFR 200.1(e), measure the achievement of children with disabilities meeting the State's criteria under § 200.1(e)(2) against those standards; and
    - (iii) If the State has adopted alternate academic achievement standards permitted in 34 CFR 200.1(d), measure the achievement of children with the most significant cognitive disabilities against those standards.
- (D) Explanation to IEP Teams. A State (or in the case of a district-wide assessment, an LEA) must provide IEP Teams with a clear explanation of the differences between assessments based on grade-level academic achievement standards and those based on modified or alternate academic achievement standards, including any effects of State and local policies on the student's education resulting from taking an alternate assessment based on alternate academic achievement standards (such as whether only satisfactory performance on a regular assessment would qualify a student for a regular high school diploma).
- (E) Inform parents. A State (or in the case of a district-wide assessment, an LEA) must ensure that parents of students selected to be assessed based on alternate academic achievement standards are informed that their child's achievement will be measured based on alternate academic achievement standards.
- (F) Reports. An SEA (or, in the case of a district-wide assessment, an LEA) must make available to the public, and report to the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children, the following:
- (1) The number of children with disabilities participating in regular assessments, and the number of those children who were provided accommodations (that did not result in an invalid score) in order to participate in those assessments.
  - (2) The number of children with disabilities, if any, participating in alternate assessments based on grade-level academic achievement standards.
  - (3) The number of children with disabilities, if any, participating in alternate assessments based on modified academic achievement standards.
  - (4) The number of children with disabilities, if any, participating in alternate assessments based on alternate academic achievement standards.
- Compared with the achievement of all children, including children with disabilities, the performance results of children with disabilities on regular assessments, alternate assessments based on grade-level academic achievement standards, alternate assessments based on modified academic achievement standards, and alternate assessments based on alternate academic achievement standards if-
- (i) The number of children participating in those assessments is sufficient to yield statistically reliable information; and
  - (ii) Reporting that information will not reveal personally identifiable information about an individual student on those assessments.
- (G) Universal design. An SEA (or, in the case of a district-wide assessment, an LEA) must, to extent possible, use universal design principles in developing and administering any assessments under this section. (Authority: 20 U.S.C. 1412(a)(16))



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

Student Name: \_\_\_\_\_

Date: \_\_\_\_\_

School: \_\_\_\_\_

Date of Birth: \_\_\_\_\_

Parent(s)/Guardian(s) \_\_\_\_\_

Grade: \_\_\_\_\_

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

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

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

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

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

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





## Rubric for Determining Eligibility for OAAP Participation

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

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



## Rubric for Determining Eligibility for OAAP Participation

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



## Rubric for Determining Eligibility for OAAP Participation

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

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

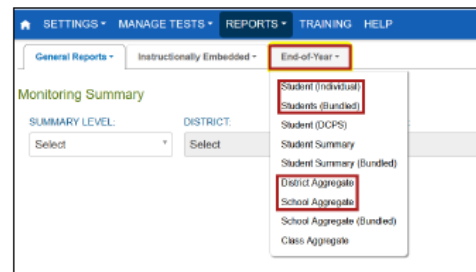
## 2025-2026 OAAP Update

### This update will cover:

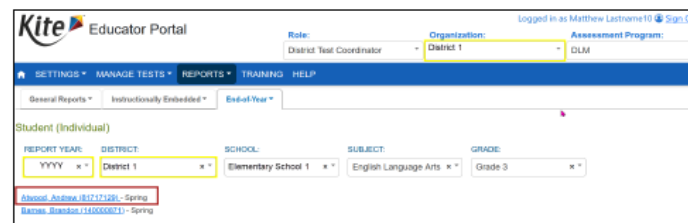
- DLM Score Reports
- Test Administrator Training Updates
- DLM Reminders

### DLM Score Reports

The 2024-2025 score reports are available for download in Kite Educator Portal. Score Reports can be accessed in Kite Educator Portal in the **Reports** tab. Select **Alternate Assessment Reports, End-of-Year** tab, and select **Student (Individual)** or **Students (Bundled)**.



Complete the filters, then select a student's name to view the Individual Student Score Report.



Bundled Student Score Reports are sorted by grade, student last name, and subject.

- [DLM Score Report Resources](#)

Below please find information about DLM assessment results and individual student reports that your district may want to share with parents.

- Parent Interpretive Guide ([English version](#); [Spanish version](#))

### Test Administrator Training Updates

Test Administrator training is open in Kite Educator Portal. Educators can now access the training by logging into Kite Educator Portal and selecting the Training tab. Below are links to the required training for new and returning test administrators. Once the first course is complete, the next course will populate. When you receive your certificate of completion, you will know you have completed all the required training!

The DLM system will only assign training courses to users assigned a teacher role in Educator Portal. District administrators who would like to complete DLM training must assign themselves a teacher role.

- All training must be completed before administering the DLM assessment.
- Each quiz must be completed with a score of 80% or better. All quizzes must be successfully completed for the entire training course to be complete.

[Guide to DLM Required Administrator Training 2025-2026](#)

### DLM Reminders

- [OAAP DTC Reminders](#)
- [OAAP Teacher Reminders](#)
- Subscribe to [DLM Test Updates](#).
- 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.

If you have any questions, don't hesitate to contact Tina Spence at [tina.spence@sde.ok.gov](mailto:tina.spence@sde.ok.gov) or Kristen Coleman at [kristen.coleman@sde.ok.gov](mailto:kristen.coleman@sde.ok.gov).

# 2025–2026

**ACT**<sup>®</sup>  
STANDARD  
ONLINE

**WINDOW 1**  
MARCH 24–27; MARCH 30–APRIL 3

**WINDOW 2**  
APRIL 7–10; APRIL 13–17

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

**cognia**

**ONLINE**  
APRIL 1 – APRIL 30

GRADE 11 CCRA  
SCIENCE &  
US HISTORY

**PAPER**  
APRIL 1 – APRIL 10

**cognia**

**ONLINE**  
APRIL 13 – MAY 13

GRADES 3–8  
ELA & MATH  
GRADES 5 & 8  
SCIENCE

**PAPER**  
APRIL 13 – APRIL 30

**WIDA**  
UNIVERSITY OF WISCONSIN–MADISON

WIDA ACCESS  
ASSESSMENTS

**WIDA ACCESS**  
JANUARY 5 – MARCH 20

**NAEP**  
NATIONAL ASSESSMENT  
OF EDUCATIONAL  
PROGRESS

**ONLINE**  
JANUARY 26 – MARCH 20

**DYNAMIC**  
LEARNING MAPS

ALL GRADES &  
CONTENT  
AREAS

**OAAP/DLM**  
MARCH 24 – MAY 14



**TESTING WINDOW**

# OAAP District Test Coordinator Checklist

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





# OAAP District Test Coordinator Checklist

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





# OAAP District Test Coordinator Checklist

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

## OAAP Contacts:

Kristen Coleman, [kristen.coleman@sde.ok.gov](mailto:kristen.coleman@sde.ok.gov), 405-522-1463

DLM Help Desk: 855-277-9751



Oklahoma State Department of Education

Office of Assessments



December 15, 2025

RE: 2025-2026 OAAP Monitoring Notification

Dear Superintendent:

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

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

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

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

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

If you have further questions, please contact [SDSpecialEducation@sde.ok.gov](mailto:SDSpecialEducation@sde.ok.gov) or 405-521-3351. Thank you for your assistance with this important matter.

Sincerely,

Special Education Services

cc: Special Education Director

**LEAs assessing over 1% of their student population on OAAP**

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

**Address Part A:**

- Answer questions regarding your participation rates

**Address Part B:**

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

Date Reviewed	OSDE-SES Reviewer

**Part A**

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

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

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

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?	
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?	

**Assurance Statement:**

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

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

**Assurance Signatures**

Superintendent Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Special Education Director Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

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

## **Improvement Plan**

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

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



**Dates to Remember**

- **December 31<sup>st</sup> -**
  - Upload completed OAAP Toolkit.

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

**OSDE Program Contact:**

Kristen Coleman, Email: [kristen.coleman@sde.ok.gov](mailto:kristen.coleman@sde.ok.gov), Phone: 405-522-1463

## 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.

# OAAP Tiered Monitoring IEP File Review Form

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

\* Indicates required question

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1. Email \*

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2. Please list your name and title. \*

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3. Please list the name of your district. \*

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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. \*

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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. \*

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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. \*

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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. \*

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# 2025-2026 Justification for Exceeding 1.0 Percent OAAP Participation Survey

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

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

For questions related to the survey, please email [assessments@sde.ok.gov](mailto:assessments@sde.ok.gov).

*\* Indicates required question*

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1. Email \*

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2. District Name \*

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3. Director of Special Education \*

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4. Email Address \*

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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:  $\text{OAAP Student Testing Population} / \text{Total Testing Population (Total Students Tested Grades 3-8, 11)} = N$ ;  $N \times 100 = \% \text{ of OAAP Assessments}$

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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? \*

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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.

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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.

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

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

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## 11. Disproportionality:

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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?

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## 12. Parent/Guardian Participation:

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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?

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

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

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

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

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

We appreciate you taking the time to provide constructive feedback.

*\* Indicates required question*

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1. Email \*

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2. First and Last Name \*

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3. Email Address

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4. Please select your role.\* \*

*Mark only one oval.*

- ☐ School district employee
- ☐ Parent
- ☐ Community Member

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

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

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

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

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