## 1.0 Percent Participation Justification Form 2017-2018

The Every Student Succeeds Act (ESSA) requires each district and charter school to complete and submit a justification when it anticipates exceeding 1.0 percent of students assessed in a subject area with the NCEXTEND1 alternate assessment. Justification from each district and charter school will be reviewed by the North Carolina Department of Public Instruction (NCDPI), and follow up actions will be determined based on the information found in the justification document. Staff from the Exceptional Children and Accountability Divisions in each district and charter school should collaborate to provide the following information on the justification document will be publicly posted. As such, the document <u>must not contain</u> any personally identifiable information. If necessary, additional pages may be attached to this form.

1. Enter contact information for the primary district/charter school staff member responsible for overseeing the completion of the justification form.

3-Digit LEA/Charter Code: 790	District/Charter Name: Rockingham County Schools
<b>Contact Name:</b> Stephanie Lowe Ellis, Pam Watkins, and Jason Hyler	<b>Contact Title:</b> Executive Director of Exceptional Children and Mental Health Programs; EC Program Coordinator; Director of Testing and Accountability
<b>Contact Phone No.:</b> 336-627-2705	Contact E-mail: <u>slellis@rock.k12.nc.us</u> , pwatkins@rock.k12.nc.us, jhyler@rock.k12.nc.us

2. Enter a description of how the district/charter school will assure that Individualized Education Plan (IEP) teams are adhering to the eligibility criteria as outlined in the *Testing Students with Disabilities* publication when determining student eligibility for participation in the alternate assessment.

In Rockingham County Schools, only students with the most significant cognitive disabilities should be participating in the state's alternate academic achievement standards. The IEP team, which includes parents as equal partners, is responsible for making this determination. North Carolina has alternate academic achievement standards in English language arts, mathematics, and science. These standards are K-12 academic standards that are aligned with college and career expectations, include rigorous content, and application. For students to be college and career ready, including students with the most significant cognitive disabilities, educators should include instruction in both academic content, as well as the reading and writing skills needed to demonstrate learning in the other disciplinary areas. Only students with the most significant cognitive disabilities who are participating in instruction aligned to the North Carolina Extended Content Standards are eligible for the state alternate assessment. In North Carolina, the statewide administered alternate assessment is the NCEXTEND1. This assessment is based upon alternate academic achievement standards, the NC Extended Content Standards.

Students who meet the eligibility criteria for alternate academic achievement standards may be classified in any of the disability categories listed in the Individuals with Disabilities Education Act (IDEA), with one exception, as long as there is documentation that the student has a most significant cognitive disability. If a student has qualified as a student with a specific learning disability, the IEP team has determined that the student's learning problems are not primarily the result of an intellectual disability. For this reason, a student who is identified as a student with a specific learning disability. For this reason, a student who is identified as a student with a specific learning disability would not meet the definition of a student with the most significant cognitive disability. Also, while some students determined eligible under the categories of Other Health Impaired, Orthopedic Impairment, and Autism may

have concomitant intellectual impairment, often times they do not. Such students would not meet the necessary criteria as a student with the most significant cognitive disabilities.

## **Criteria Description:**

## Cognitive and Academic Functioning

Significant cognitive disability is characterized by scores on verbal or nonverbal assessments of cognition that are at least 2½--3 standard deviations below the mean. Academic deficits or difficulties alone do not indicate that a student has a significant cognitive disability. Further, a significant cognitive disability will be pervasive, affecting student learning across content areas and in social and community settings. Not all students with intellectual disabilities have the most significant cognitive disability. Students should be carefully considered for the alternate academic achievement standards, the Extended Content Standards, and they should not automatically be assigned to the alternate assessment based on their identified disability category. Many students eligible to receive special education services under these categorical labels are able to participate in general curriculum, when provided with specially designed instruction, as well any needed related services, supplementary aids and services (e.g. instructional accommodations), and program modifications and supports for school staff.

Adaptive behavior relates to independence in everyday living skills, including interpersonal and social interactions across multiple settings. To be considered a student with a most significant cognitive disability, students should demonstrate deficits in adaptive behavior with scores that are at least  $2\frac{1}{2}$ -3 standard deviations below the mean in at least two adaptive skill domains below.

- Conceptual skills: receptive and expressive language, reading and writing, money concepts, self-direction.
- Social skills: interpersonal, responsibility, self-esteem, follows rules, obeys laws, is not gullible, avoids victimization.
- Practical skills: personal activities of daily living such as eating, dressing, mobility and toilcting; 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.

## Grade Level Expectations

When an IEP team is discussing whether or not a student is a student with the most significant cognitive disability, the team reviews documentation of how the student is currently performing on grade-level academic tasks and the frequency in which it has been documented. IEP teams look closely at the students' present level of academic performance on the IEP and answer the question, "How does the student currently access and engage with the grade level academic content standards?" Progress monitoring data, grade level performance, and student assessment data along with IEP observations are utilized to answer this question.

## Extensive, Direct Individualized Instruction and Substantial Supports

As IEP teams are discussing whether or not a student should qualify as a student with the most significant cognitive disability, the team also discusses what the school day looks like for the student as well as make sure that the student has a reliable and established communication system. The IEP team considers how much time the student spends learning new material, how much time a teacher is reteaching and pre-teaching, and the level and frequency of prompting the student needs. Students who are identified with a most significant cognitive disabilities are likely to require direct support from adult caretakers in post-secondary settings (e.g. work, daily living) and require assisted living supports. Additionally, the IEP team considers how often and with what intensity does the student require direct, individualized instruction. Sometimes in instruction, students need additional supports beyond those that are permissible on the statewide assessment. If the student requires the use of assistive technologies (AT) to actively engage and participate meaningfully and productively in daily activities in the home, school, work and community, IEP teams consider information from AT evaluations and ensure that these supports are included in the IEP. The IEP team also considers what universal tools, supports and accommodations the student has used on district and statewide assessments.

## **Testing Training**

All RCS staff that administer the NCEXTEND1 attend a training by the Testing and Accountability Department. The testing manual and regulations are provided and reviewed. Accommodation guidelines are reviewed. All participants administering the NCEXTEND 1 sign a testing training record/verification log. All of the materials are accounted for prior the assessment and also following the assessment by the school testing coordinator. The testing coordinator and administrator both sign to verify this information. The testing coordinator turns in all verifications and test materials and the district testing coordinator verifies it then as well.

#### **Internal Audit Process**

RCS' internal audit team uses all of the information above in reviewing records of students with disabilities. RCS EC Department implements an internal audit review system. Each initial placement and re-evaluation completed and required to be sent into audit. RCS EC Department completes the internal EC file review in order to provide feedback for case managers to help guide in policy implementation for students with disabilities. Documentation of this includes EC file review and log notes. This information is used to drive our departments professional development in identified areas of need. Each training hosted by the RCS EC Department has a compliance section/update to maintain compliant practices and procedures. A host of trainings were developed specific to staff needs and results of previous internal audits. These trainings were offered in a variety of formats. The RCS EC department has quarterly departmental meetings for each level (PreK, Elementary, Middle/High, Specialist Positions). District and building level administrators receive essential compliance training through the RCS administrator retreat that is held each August. Each year new updates compliance information is shared with district and building level administrators. Follow up is provided each month at District Principal Meetings. The EC Department has a standard training time during each of these meetings in which we provide updates and information. In addition, supplemental trainings (through EC webinars) are held at various district level meetings to address issues relevant for elementary, middle, and high school administrators. In addition, five Beginning EC Teacher Sessions are held to support beginning teachers in learning their role for compliance, instruction, and overall EC duties. The internal audit team uses a special worksheet to review present levels of performance and IEP goals. Please see below for the IEP compliance worksheet that is completed in addition to the state audit form.

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#### **Participation in Alternate Assessment**

Only students with the most significant cognitive disabilities should be participating in the alternate assessment, and no student should take the alternate assessment unless they are also participating in the alternate academic achievement standards, the NC Extended Content Standards. The IEP team, which includes parents as equal partners, is responsible for making this determination.

#### **Diploma Requirements**

The IEP team is constantly aware that participation in alternate academic achievement standards and alternate assessment means that the student is participating in a curriculum that may not lead to a high school diploma. IEP teams explain the diploma requirements and document this detail on the Prior Written Notice (DEC 5). IEP teams ensure parents are fully informed of implications of participating in curriculum aligned to alternate achievement standards and alternate assessments through documenting this information and providing an implementation timeframe. IEP teams inform parents on the difference between assessments based on grade-level academic achievement standards and those based on alternate academic achievement standards and how participating in alternate assessment may delay or otherwise affect the student from completing the requirements for a regular high school diploma. IEP teams also understand that a student participating in the alternate assessment cannot be precluded from attempting to complete the requirements for a regular high school diploma.

#### **The Verification Process**

#### 95% Participation Rate

The district has measured the achievement of, at least 95% of all students, including students with disabilities in tested grades. When calculating a our district's participation rate, we consider only the grade levels that are factored into federal accountability (3-8 and 10 and 11) in the subject areas of English language arts, mathematics and science. Calculations are applied to the district level, not to school level. In addition, the data includes any students sent outside of your district for services but for whom we are still accountable. Students who are parentally opted out of assessment are not included in the 1% participation calculations as they are considered 'not tested' for accountability purposes. Parent opt-outs; however, count against the district's' required 95% participation rate.

#### Academic Standards

Students who will be participating in an alternate assessment are included in alternate curriculum aligned to the alternate academic achievement standards. Unless a student is expected to take alternate assessments aligned with alternate achievement standards, the student is full time in the general education curriculum. If the student participates in curriculum aligned with alternate achievement standards, benchmarks or short-term objectives must be included with the measurable annual goals. Only students with the most significant cognitive disabilities should be participating in the alternate academic achievement standards.

#### **Inform Parents**

Parents are informed of their child's participation in an alternate assessment and implications of participating. When IEP teams in RCS are making the determination about whether a student has the most significant cognitive disabilities, they complete a statement on the Prior Written Notice (DEC 5) that the IEP team has discussed implications of participating in the alternate assessment and possible implications for graduation.

## Disproportionality

RCS reviews data about disproportionality regarding the Alternate Assessment. RCS reviews our student participation data for the alternate assessment and have disaggregated the data by race, economically disadvantaged as well as language status. We work to have discussions in our RCS Graduation Task Force, EC Leadership Meetings, Testing & Accountability Meetings, Principal Meetings, and EC Professional Development. If disproportionality is found in the schools data, they are asked to address this within their strategic plans for their school. We also ask for staff to attend a professional development for staff who are making decisions at IEP meetings about students with the most significant cognitive disabilities.



• Description of how any disproportionality among race, gender, socioeconomic status groups is defined:

## **District Percentages**

RCS has 1.0 percent overages in the following areas: Grade 3 Reading (16 students out of 964=1.70), Grade 3 Math (16 students out of 964=1/70), Grade 4 Reading (13 students out of 996=1.3%), Grade 4 Math (13 students out of 996=1.3%), Grades 6 Reading (10 students out of 858=1.2%) and Grades 6 Math (10 students out of 858=1.2%), Grade 10 Reading (15 students out 1015= 1.5%), Grade 10 Math (15 students out 1015= 1.5%), and Grade 11 Science (12 students out of 875=1.4%). Our overall district percentage is: Reading (65 students out of 5452=1.2%), Math (64 students out of 5449 = 1.2%), Science (18 out of 1841=1.0%).

## Race/Ethnicity

#### African American:

African American students on the alternate assessment all fell below the total number of 10 as indicated below. 3rd Grade Reading AA (5 out 16); 3rd Grade Math AA (5 out of 16), 4th Grade Reading AA (1 out of 13), 4th Grade Math AA (1 out of 13), 6th grade Reading AA (6 out of 10), 6th grade Math AA (6 out of 10). 10th grade Reading AA (7 out 15), 10th grade Math AA (7 out of 15) Grade 11 Science ????

## Hispanic:

3rd Grade Reading Hisp (4 out of 16); 3rd Grade Math Hisp (4 out of 16)

## American Indian:

4th Grade Reading AMIN (1 out of 13); 4th Grade Math AMIN (1 out of 13)

#### Asian:

6th Grade Reading Asian (1 out of 10) 6th Grade Math Asian (1 out of 10)

#### White:

10th Grade Reading White (7 out of 15); 10th Grade Math White (7 out of 15); 11th Grade Science White????

## Multi:

4th Grade Reading Multi (2 out of 13); 4th Grade Math Multi (2 out of 13)

## Gender

Males are over the 1.0 rate in all the testing categories listed above. 3rd Grade Reading Males (12 out of 16); 3rd grade Math Males (12 out 16) 4th Grade Reading Males (9 out of 13), 4th Grade Math Males (9 out 13) 10th Grade Reading Males (11 males out of 15), 10th Grade Math Males (11 males out of 15), Grade 11 Science ?????

## **Economically Disadvantaged**

4th Grade Reading Eds (1.39%); 4th Grade Math Eds (1.39%) 10th Grade Reading Eds (1.52%); 10th Grade Math Eds (1.5%) 11th grade Science Eds (1.04%)

## **Considerations for Justification for 1.0 overages:**

Rockingham County Schools has a significant drop in enrollment over time. Since 2006, the distrit has dropped enrollment by 2,171 students. However, our enrollment for students with disabilities and specifically students with significant cognitive disabilities have remained in the district. The past five years of headcount data indicate an increase in students with disabilities:

- Dec 2017 2,062
- Dec 2016 2,066
- Dec 2015 2,062
- Dec 2014 2,068
- Dec 2013 2,030

Therefore, since there has been significant change in overall percentage, this provides some explanation for the slight overage of the 1.0 percentage for alternate assessments.

Our district is a Ticr 2 county based on average unemployment rates, median household income, percentage growth in population, and adjusted property tax base per capita. Overall, the district has a percentage of 11% free and reduced population of students. This percentage is a large amount of our students and therefore may explain the overages in the area of "Eds."

It is important to note that in reviewing the students in our district who are placed on the alternate assessment, some additional considerations are important to note. When considering the profiles of students who participated in the alternate assessment, learners experienced notable difficulties in expressive and receptive communication and often required augmentative/alternate communication systems (AAC; Almond & Bechard, 2005; Towles-Reeves, Kearns, Kleinert & Kleinert, 2009). Approximately 80% of students in the alternate assessment use symbolic oral speech or AAC to communicate a variety of intents. An additional 10% to 12% communicated with emerging use of symbols by using pictures, objects, or gestures to express a variety of intents, where as a smaller 8% to 10% had no clear use of words, pictures, objects, or gestures to communicate expressively. In addition, the smallest group, about 2%, had very

low levels of engagement and required assistance with motor tasks.

Understanding the communication competence of students in the alternate assessment is essential. A decision to participate in the alternate assessment should not be made entirely based on one component within the criteria. As mentioned earlier IEP teams cannot make their decision to participate based on only 1 area, and that includes the need for accommodations (e.g., assistive technology/AAC) to participate in assessment process. However, these areas were all noted by researchers as appropriate areas of consideration for alternate assessments. Students who were identified as having the "most significant cognitive disabilities" were those learners who in addition to functioning at a pre-symbolic level of receptive and expressive communication, were also more likely to have other characteristics such as low levels of social engagement, limited motor skills, are more likely to experience one or more sensory impairments, and are more likely to have health related issues that impact regular school attendance. (Kearns, J.F., Towles-Reeves, E., Kleinert, H. L., O'Regan Kleinert, J., and Kleiner-Kracht Thomas, M. (2011) Characteristics of and implications for students participating in alternate assessments based on alternate academic achievement standards. *The Journal of Special Education, 45(1)* 3-14).

• Plans for how disproportionality will be addressed:

## **Professional Development and Learning**

Provide professional development for IEP team members and other educators on the nature of the alternate assessment and who should participate in it. IEP team members need to understand the purpose of the alternate assessment and the characteristics of students who most appropriately participate in that assessment. Training will be provided by the EC Leadership team to lay out these and other key considerations when making participation decisions. All educators, including those who are not members of IEP teams, should have a solid understanding of how to make appropriate instruction and assessment decisions for all students, including students who may be candidates for the alternate assessment. It is important to consider the accessibility features and accommodations available for the general assessment because they can enable many students to meaningfully participate in the general assessment. Training needs include:

- Using participation guidelines to make assessment participation decisions
- Differentiating instruction and providing better access to academic content
- Selecting, implementing, and evaluating accessibility features and accommodations for instruction and assessments.
- IEP teams especially must understand the possible effects of student participation in the alternate assessment. It may have implications for the type of diploma the student receives, as well as the student's postsecondary and career readiness. Although ESSA indicates that participation in an alternate assessment should not preclude a student from attempting to meet the requirements of a regular diploma, it is important that IEP team members know NC state graduation requirements and how students who participate in alternate assessments are addressed in those requirements. The district will implement a new procedure of signing an additional document. IEP teams who make the decision to place a student in an alternate assessment would sign a document indicating their understanding of the implications of the decision to assess a student with an alternate assessment.
- Please see new forms developed to ensure IEP teams have appropriate documented appropriately to select an alternate assessment for the student. This information documents that the student has significant cognitive disability; the student is instructed using the alternate achievement standards across all content areas; and parent notification has occurred in addition to the DEC 5 (Prior Written Notice). The "Determining Participation in General Education Curriculum Aligned to General Education Standards Guidance Flow Chart" below will be used in Professional Learning and Training along with the "Participation Guidelines for Alternate Assessment Form."

## Determining Participation in General Education Curriculum Aligned to General Education Standards Guidance Flow Chart



#### PARTICIPATION GUIDELINES FOR ALTERNATE ASSESSMENT

Name of Student

Date

IEP teams are responsible for deciding whether students with disabilities will participate in general education assessments with or without testing accommodations, or in the alternate assessment with or without accommodations\*. In a given year, a student must participate in either all general education assessments or all alternate assessments, not parts of both.

Participation Criterion	Participation Criterion Description	Agree (Yes) <u>or</u> Disagree (No)
1. The student has a most significant cognitive disability.	<ul> <li>In order to define a student as having a most significant cognitive disability, the IEP team must review student records and agree:</li> <li>The student typically characterized as functioning at least two and half to three standard deviations below the mean in both adaptive behavior and cognitive functioning; and;</li> <li>The student performs substantially below grade level expectations on the academic content standards for the grade in which they are enrolled, even with the use of adaptations and accommodations; and</li> <li>The student requires extensive, direct individualized instruction and substantial supports to achieve measurable gains, across all content areas and settings.</li> </ul>	Yes / No *Please describe the IEP Team response on the Prior Written Notice.
2. The student is instructed using the alternate achievement standards across all content areas.	Goals are listed in the IEP for this student are linked in the enrolled grade level alternate achievement standards and address knowledge and skills that are appropriate and challenging this student.	Yes / No *Please describe the IEP Team response on the Prior Written Notice.
3. Parent Notification	<ul> <li>The parent (s) and LEA have discussed:</li> <li>The differences between the alternate achievement standards and academic content standards for the grade I which the child is enrolled, and</li> <li>That the student's achievement will be measured based on alternative achievement standards, and</li> <li>How the student's participation in alternate standards and assessment (s) may delay or otherwise affect the student from completing the requirements for a regular high school diploma.</li> </ul>	Yes / No *Please describe the IEP Team response on the Prior Written Notice.

Decisions for determining participation in the alternate assessment must not be based solely on any of the following:

- 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

- 8. English Learner (EL) status
- 9. Low reading level/achievement level
- 10. Anticipated student's disruptive behavior
- 11. Impact of student scores on accountability system
- 12. Administrator decision
- 13. Anticipated emotional distress
- 14. Need for accommodations (e.g., assistive technology/Augmentative and Alternative Communication) to participate in assessment

\*Academic content standards for the grade in which the child is enrolled and general education assessments reflect the NC Extended Content Standards. Alternate achievement standards and assessments reflect the NC Extended Content Standards. Students who are English Learners are required to participate in an annual English language proficiency assessment.

#### **Parent Information Sessions**

Provide information sessions for parents of students with disabilities so that they can participate in the IEP decision-making process about the assessment in which their child participates. The decision about which assessment a student participates in has major implications, and RCS would like to provide additional opportunities for parents to learn and review this information. Information sessions for parents can help them better understand the NC assessment options, and enable them to be more informed IEP team members. Understanding participation guidelines, the characteristics of the alternate assessment, what the participation experience is like, and possible accessibility features and accommodations options that might enable their child to participate in the general assessment will enable them to better advocate for their child.

#### **Graduation Task Force**

RCS has a Graduation Task Force that began this school year. Specifically, this group includes representation from the Exceptional Children's Department, Instructional Support, Curriculum and Instruction, and Testing and Accountability, Special Education Teachers, General Education Teachers, Social Workers, School Counselors and Dropout Prevention Counselors and Carcer and Technical (CTE) Staff. THe purpose of this group is problem solve using the Team INitiated Problem Solving Process and Implementation Science to identify interventions and supports for students. Specifically, the team works to specifically address graduation data for students with disabilities. This team recently met and discussed the data regarding the 1.0 Percentage overage. Action planning occurred with detailed information listed in this section. The form used for completion for alternate assessment by IEP team was reviewed to be used for the 2018-2019 school year. See picture below of the form. The EC Department has employed a High School Transition Lead also monitors and conducts transcript audits of students with disabilities. Since the implementation of the Graduation Task Force and new monitoring completed by the EC Department, the graduation rate has increased from 58.9% to 68.8%!

#### LEA Self Assessment/Strategic Planning by the Exceptional Children's Department

The Exceptional Children's Department works to ensure that RCS has strategic plan for the department. Our LEA Self Assessment/Strategic Plan includes goals in operational excellence, instructional excellence, post-secondary outcomes, and behavioral and mental health access. The area of Graduation and Post Secondary Outcomes especially address the area of alternate assessments and indicated the above strategies in this section of this document as part of RCS improvement plan.

4. Enter additional justification of variables not covered but deemed essential to understanding why the district/charter school has a higher rate of alternate assessment participation.

RCS has extensive training and support from the Testing and Accountability Department. The EC Department and Testing and Accountability Departement meet regularly and also both serve together on the Graduation Task Force. Therefore, staff receives very well developed training and support through this process. Evidence that all educators who administer the alternate assessment meet the requirements for test administrators and have received test administration training prior to administering the alternate assessment is included as evidence of this training.

# EXTEND I TRAINING ATTENDANCE ROSTER DATE OF TRAINING: 21411-

Topics Extend 1 Assessment Guide, NC Testing Code of Ethics, NC Education (if needed) By signing this attendance roster, you acknowledge that:

- · You have been trained and are prepared to administer the READY NC EXTEND 1; and
  - You agree to uphold the provisions of the Testing Code of Ethics.

School	Name Printed (legible)	Signature
DMH5	Rebekah Williams	Rivelians
DMH5	Elizabeth Carlson	Elizabet & Gord 8-
MHS	Dennifer Hankins	Gennefer Wartin
MHS		
RH5	Hohley Pobh	toll solh
RH5		
RCHS	Rachel Goots	Ruchel a Host
RCH5	Kyle Inegers	Ruche a Stort
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## EXTEND I TRAINING ATTENDANCE ROSTER DATE OF TRAINING: 51411

Topics Extend 1 Assessment Guide, NC Testing Code of Ethics, NC Education (if needed) By signing this attendance roster, you acknowledge that

- · You have been trained and are prepared to administer the READY NC EXTEND 1, and
  - You agree to uphold the provisions of the Testing Code of Ethics.

School	Name Printed (legible)	Signature
MONROETON	Lauren Kennedy	Y States
MONROETON	JOHN HARDER	Qu-
Monrocton		Higher
M055 5T.		
M055 5T.		
NEW VISION		
NEW VISION		
SOUTH END		
SOUTH END		
STONEVILLE	Dana Tucker	Jane Sucker,
STONEVILLE		
Wentworth	June Kemp	June Bemp
WENTWORTH		Jan Harris
WBURG	Mandy Swofford	March E. Surffel
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## Signatures

Superintendent/Charter School Director

**Exceptional Children Director** 

LEA/Charter Test Coordinator

Dr Hoch (9071) Date 5-4-19 Septenic John Ollis Date 5-07-18 John A. Hy Date 5-4-18

The completed justification form must be signed by the superintendent/charter school director, exceptional children's director, and testing coordinator. The form must be scanned and emailed to <u>alternateassessment@dpi.nc.gov</u> by May 4, 2018.

The NCDPI will notify districts/charter schools in writing if further information is needed and will include next steps. For questions, please contact your Exceptional Children Director or Regional Accountability Coordinator.

Note: See page 3 for additional information that can be included but is not required.