



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

**APR 12 2019**

The Honorable Sheila A. Alles  
Interim State Superintendent of Schools  
Michigan Department of Education  
608 West Allegan Street  
Lansing, Michigan 48909

Dear Superintendent Alles:

I am writing in response to the Michigan Department of Education's (MDE's) request on January 9, 2019 for an extension of the State's waiver of section 1111(b)(2)(D)(i)(I) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), of the requirement that a State may not assess using an alternate assessment aligned with alternate academic achievement standards (AA-AAAS) more than 1.0 percent of the total number of students in the State. MDE requested this waiver because, based on State data for the 2017-2018 school year, MDE has concluded that it will need to assess more than 1.0 percent of students using an AA-AAAS in the 2018-2019 school year.

After reviewing MDE's request, I am granting, pursuant to my authority under section 8401(b) of the ESEA, for the 2018-2019 school year, a one-year extension of the State's waiver of section 1111(b)(2)(D)(i)(I) of the ESEA so that the State may assess with an AA-AAAS more than 1.0 percent of the total number of students in the State who are assessed in reading/language arts, mathematics and science. MDE demonstrated substantial progress in carrying out the plan that was submitted when the State initially requested this waiver a year ago.

As part of this waiver, MDE assured that it:

- Will continue to meet all other requirements of section 1111 of the ESEA and implementing regulations with respect to all State-determined academic standards and assessments, including reporting student achievement and school performance, disaggregated by subgroups, to parents and the public.
- Assessed in the prior school year (2017-2018) at least 95 percent of all students and 95 percent of students with disabilities who are enrolled in grades for which an assessment is required.
- Will require that a local educational agency (LEA) submit information justifying the need of the LEA to assess more than 1.0 percent of its assessed students in any such subject with an AA-AAAS.
- Will provide appropriate oversight of an LEA that is required to submit such information to the State, and it will make such information publicly available.
- Will verify that each LEA that is required to submit such information to the State is following all State guidelines in 34 CFR § 200.6(d) (with the exception of incorporating principles of universal design) and will address any subgroup disproportionality in the percentage of students taking an AA-AAAS.
- Will implement, consistent with the plan submitted in MDE's waiver request, system improvements and will monitor future administrations of the AA-AAAS to avoid using an AA-AAAS to assess more than 1.0 percent of the total number of tested students in the State.

I am granting this extension in part because Michigan has demonstrated progress in reducing the percentage of students taking an AA-AAAS in each subject. However, Michigan still has some of the highest rates of AA-AAAS participation in the nation. Because of these high rates of AA-AAAS participation, I expect to see the continued efforts to substantially reduce these rates in the 2018-2019 school year and beyond.

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

In practice, a student's Individualized Education Program (IEP) team follows the State's participation guidelines to determine whether the AA-AAAS is the most appropriate assessment for a given student. In accordance with 34 CFR § 200.6(d)(1), a State "must establish, consistent with section 612(a)(16)(C) of the IDEA, and monitor implementation of, clear and appropriate guidelines for IEP teams to apply in determining, on a case-by-case basis, which students with the most significant cognitive disabilities will be assessed based on alternate academic achievement standards." The regulation also includes that such guidelines must include a State definition of "students with the most significant cognitive disabilities." In our review of MDE's extension request, we did not find a clear State definition for "students with the most significant cognitive disabilities" in the State's AA-AAAS participation guidelines.

Beginning next year, any request for an extension of this waiver will be contingent on both continued progress implementing your plan and substantial progress in reducing the percentage of students taking the AA-AAAS. Any request for an extension of the waiver will also be contingent on the development of a clear State definition of "students with the most significant cognitive disabilities" and evidence that the State has incorporated this definition into the State's AA-AAAS participation guidelines.

In addition, I want to remind you of the requirement in 34 CFR § 200.6(c)(3)(iv) that the State must make publicly available the information submitted by an LEA justifying the need of the LEA to assess more than 1.0 percent of its students on the AA-AAAS, provided that such information does not reveal personally identifiable information about an individual student. I also encourage you to make available your State's plan and timeline and your progress to date in reducing the percentage of students taking the AA-AAAS.

Finally, in order to help all States support implementation of the 1.0 percent participation threshold for AA-AAAS participation, the Department is supporting work by the National Center on Educational Outcomes (NCEO) and the Center on Standards and Assessment Implementation (CSAI) to host three Peer Learning Groups (PLGs):

- Digging into Your Data: Building a One Percent Data Analysis and Use Plan
- Guiding and Evaluating District Justifications for Exceeding the One Percent Cap
- Building Capacity of IEP Teams and Parents in Making Decisions about Assessment Participation

If you have questions about any of these PLGs, please contact Susan Hayes, NCEO, at [shayes@wested.org](mailto:shayes@wested.org) or (802) 951-8210.

I appreciate the work you are doing to improve your schools and provide a high-quality education for your students. If you have any questions, please contact my staff at [OSS.Michigan@ed.gov](mailto:OSS.Michigan@ed.gov).

Sincerely,



Frank T. Brogan  
Assistant Secretary  
for Elementary and Secondary Education

cc: Teri Chapman, Director of Special Education



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

GRETCHEN WHITMER  
GOVERNOR

SHEILA A. ALLES  
INTERIM STATE SUPERINTENDENT

January 9, 2019

Jason Botel, Principal Deputy Assistant Secretary  
Office of Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202  
[Jason.botel@ed.gov](mailto:Jason.botel@ed.gov)

Dear Mr. Botel,

On January 9, 2018, the Michigan Department of Education (MDE), requested a waiver from the U.S. Department of Education on Every Student Succeeds Act (ESSA) requirement that caps participation on the state alternate assessment to no more than 1% of all tested students. On May 14, 2018, this waiver request was approved, and Michigan implemented the plan within the waiver request.

MDE has recently reviewed participation data on statewide summative assessments in 2017-2018. The purpose of this review was to determine the participation rates of students taking the state alternate assessment aligned with alternate academic achievement standards (AA-AAAS), better known in Michigan as MI-Access. A result of this analysis revealed that while there was a drop-in percentage rates on the AA-AAAS (MI-Access) from 2016-2017 to 2017-2018 in all subject areas, MDE anticipates exceeding the 1% CAP in 2018-2019 as local education agencies (LEAs) work to continue to address assessment selection and participation to move the state toward meeting the 1% CAP requirement. This document serves as a formal request to extend the approval on the waiver originally approved on May 14, 2018 for the 2018-2019 year, with additional steps added to the plan for improvement.

MDE communicated to the public its intent to file a waiver for the 1% CAP on alternate assessment participation. This communication was sent from the state superintendent of education to local and Intermediate School District (ISD) superintendents and public-school academy directors with a copy to the Michigan Education Alliance. In addition, this communication was sent to all ISD and LEA/ Public School Academies (PSA) special education directors, as a state-wide press release, a memo to Michigan Alliance for Families (MAF) and the Special Education Advisory Committee (SEAC). An article in the state-wide newsletter regarding student assessments provided a link to the survey and it was also posted on the Office of Special Education (OSE), MI-Access (Michigan's alternative assessment),

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and the general assessment websites. The memo is provided as Attachment 1. Public comment opened on November 15, 2018 and closed on December 17, 2018, which provided a similar window to other MDE surveys.

Michigan had 22 total respondents who provided comments on the following open-ended opportunities found in the survey. Respondents answers are consistent in the numbering, for example #1's response in Prompt #1 is the same respondent in #1 in Prompt #2, and so on. Results are as follows:

**PROMPT #1:**

Please comment on the overall updated plan. Provide more in-depth guidance to Intermediate School Districts (ISDs) and Local Education Agencies (LEAs) on examining data for students taking the alternate assessment when overall LEA rate is over 1%. Create a tiered system of support Tier I for all would include additional: communications for the training currently available online as developed for the 2017-2018 plan; in-person training as requested by ISDs or LEAs; resources developed by MDE, ISDs or LEAs for others to access and use (such as developing standards based IEPs based on alternate content standards). Tier II for LEAs whose participation exceeds 2% or whose data indicates issues of disproportionality in state testing for students with disabilities. MDE will work with ISDs to provide support at this level. Tier III for LEAs whose participation rates fall within the highest 3% of all participation rates in the state, or whose participation rate exceeds 2% and whose data indicates issues of disproportionality in state testing for students with disabilities. MDE will work with ISDs to provide support at this level:

1. I would like to see the wording for Tier II to include "...participation exceeds 2% and/or whose data indicates".
2. I appreciate the tiered approach to the provision of supports.
3. Tier II - support should include program visits at LEA levels by state. This will allow the state to have a broader picture of students and needs that push the levels above the 1% mark.
4. Agree.
5. Communication related to the above resources is key.
6. The tiered system is a good start to address participation rates over 1%. However, we may also need to include some content related to: district size which can impact participation rates, as well as those districts that agree to provide services to severely disabled students at the local level rather than sending them to ISD programs.
7. No one district should be allowed over 1% CAP.
8. I think that this is forcing kids to take an assessment who whether or not they have the ability to, more often than not do not want to take it. I have parents constantly want to exempt or simply have their students not attend when these are administered. I would hope that the MDE would invest in understanding the element of motivation to take the exam. Especially when we are discussing the ACT or SAT WHICH IS A COLLEGE READINESS EXAM. Many times, we are forcing students who do not plan on going to college and entering the workforce with these assessments. Dumping more money into the ISD for "training" is silly and simply validates someone's employment.
9. Respondent skipped this question.

10. In my understanding of this 1% you are stating a school with a population of 1700, can have no more than 17 students take an alternate assessment. What if that school has 30 students on an alternate track? Yes, that seems high, but some schools have a higher population of students like this because of the specific programs they offer or in the case of virtual schools, it allows for students who would not succeed anywhere else a chance at an education. And if a school is above your 1%, they are punished? This sounds a lot like the same schools who put caps on other eligibility for special education and students go misdiagnosed their entire education. This honestly sounds like you are trying to "improve" numbers by forcing schools to follow misguided thoughts on what is best for the student. I am inclined to ask, do the people who think these things up have a background in education? When was the last time they were even in a classroom? Isn't one of your buzz words differentiation? Meaning that not all students are going to learn the same and that assessments do not have to be the same as long as the student is showing mastery of the concepts? Are you not forcing them to all just do the same thing, ignoring if it is appropriate or not to their abilities? I would happily invite our local ISD to come to our school, assess the students we service, and tell us what students they think should be taking what test. If you, the State do not trust the educators of those students to make an educated decision, why do you not just come and make the choice for us?
11. It sounds, by requiring that alternative assessments not exceed 1% regardless of individual circumstances, that the folks who crafted the law want many very impaired people to take tests such as the SAT. As a high school special education teacher, I have mixed feelings. It is important for students and parents to understand how they compare to non-disabled peers, but M-STEP and SAT are not the only or even the most reliable ways to measure this. It feels like an extra requirement that doesn't help the most educationally fragile kids.
12. Who makes these decisions?
13. Having a system in place that analyzes the data for students struggling and needing interventions is Key. Living in Flint and seeing students transfer in and out of schools, I feel it's important that we continue to renew the waiver so that students can be taking the assessment at their needed level.
14. Respondent skipped this question.
15. As an online virtual public school with student access throughout the state of Michigan, it is not appropriate to set artificial percentage caps on special needs students, when our student population does not necessarily mirror the "typical" occurrence of special needs students found in a traditional geographic community.
16. This creates huge scorecard issues for those schools with higher than the 1% CAP. Arbitrary caps are harmful to districts that simply have a high number of extremely at-risk students. We experience high numbers because we have some exceptional special ed teachers and it is widely known throughout the ISD. We welcome these children and they thrive, to their potential, with these teachers. Area parents want them here because of the reputation we have. This does NOT mean, however, that all these students are ready to take the M-STEP or grade level SAT's.

17. I am concerned that even with the tiers that we are not making appropriate decisions for students that are at least two grade levels behind. I feel we are setting them up for failure and frustration.
18. Do not spent time on such a plan...develop it in 30 seconds and submit. It is stupid to create an arbitrary limit and try to enforce it in any reality. Say what you must to keep the feds away, but then let it sit on a shelf.
19. Respondent skipped this question.
20. I agree there needs to be multiple levels of support based on the district's demographics as well. For instance, my district houses a number of special education programs for the surrounding area, thus making our percentage of students tested with the alternate access higher. I would like further guidance for a district like ours on what we should/could be doing for our students in this program taking the alternate assessment.
21. Please do away with this test. This test is a legal way to not educate a student. Most states do not offer an alternate assessment because they figure out a way to academically educate students with disabilities. You are hindering entire life outcomes by having this "test" available. It causes systematic dependency from day 1.
22. This test, as a whole is a life hinderance, allowing districts to not academically educate students. Please do away with it, all together, and believe in students with disabilities. All kids matter, including those with disabilities.

**PROMPT #2:**

Please comment on component: Provide more in-depth guidance to Intermediate School Districts (ISDs) and Local Education Agencies (LEAs) on examining data for students taking the alternate assessment when overall LEA rate is over 1%.

1. This is fine.
2. In some districts, more in-depth guidance is necessary. The flowchart alone is not enough for some district leaders to understand when the assessment should be used.
3. No comment
4. Agree
5. "More in-depth guidance" is too vague to provide input. I like the idea but am unclear about what it means.
6. It will be VERY helpful to have a guidance document for LEAs to utilize when examining data. Possibly utilizing the flowchart format available on the MDE website for IEP teams to determine the appropriate state test and adding some details. Such as: the student's performance on past state-wide assessments, the student's performance on district assessments, and the student's current curriculum and modifications of that curriculum.
7. Must go to training for LEAs and ISDs not to identify. Work all students into MTSS systems of support.
8. No, it is simple. Every student takes the test no matter if they want to or not. Unless the student can't physically or mentally take the exam.
9. Respondent skipped this question.
10. If the goal is 1% or less. Make the ISD responsible for making the decisions. This is not a "the school needs help" issue for all schools. If the school has made the appropriate decision on its students and their numbers are 3%, why are they being punished? Give the ISD more responsibility and have the come

in and review all of them. It sounds like the State has not trust in its teachers and schools, so pass on the final decision to the ISDs.

11. We'll give whichever test we're forced to give but giving M-STEP and SAT to students who have cognitive impairments won't help anyone except the paperwork gods.
12. Ok. Does someone believe the LEAs are trying not to test all the kids they can?
13. Examining all data pertaining to our students is key. Taking a bigger look at a student's mental illness, attendance, documented medical diagnosis, and IEP's are all big components for determining proper testing, as well as their post-secondary goals.
14. Respondent skipped this question.
15. As an online virtual public school with student access throughout the state of Michigan, it is not appropriate to set artificial percentage caps on special needs students, when our student population does not necessarily mirror the "typical" occurrence of special needs students found in a traditional geographic community. We do not get to choose who attends our school. The very nature of online public schools is predisposed to attracting a higher percentage of special needs students.
16. The data is analyzed over and over as we target those specific points of deficit. They are repeated to the students over and over using a variety of techniques and approaches. This includes specialized teachers, paras, technology, classroom teachers. Not all these people are doing the wrong thing. Some of these children still do not progress to the level where their scores are reflective of their age and grade.
17. As a district, we need to make decisions about assessments that may not be appropriate for the student but based on the guidelines they should be taking the general assessment.
18. We don't need more guidance at the ISD and LEA level...we need more rational thought and intelligence at the national level on this, and/or our state to advocate for reality.
19. Respondent skipped this question.
20. I would love to have this type of LEA level support. We truly believe we are testing our students appropriately, so I would like to see what other opinions would be.
21. What data? None of it can be published because the numbers are too low. Please do away with this test.
22. This test, is a life hinderance, allowing districts to not academically educate students. Please do away with it, all together and believe in students with disabilities. All kids matter, including those with disabilities.

**PROMPT #3:**

Please comment on component: Create a tiered system of support Tier I for all would include additional: communications for the training currently available online as developed for the 2017-2018 plan; in-person training as requested by ISDs or LEAs; resources developed by MDE, ISDs or LEAs for others to access and use (such as developing standards based IEPs based on alternate content standards):

1. This is fine.

2. I love the tiered system of support. This enables MDE to provide the most significant supports where it is needed the most.
3. No comment
4. Agree
5. Communication is key
6. Great idea - will need an effective way to share the resources and training options with providers. The MDE website improvements have been a positive change, however many special education providers do not routinely access the website.
7. Only standards based. Drop alternative standards
8. Don't dump this on the ISD. It is pretty simple. Every student takes the test no matter if they want to or not. Unless the student can't physically or mentally take the exam.
9. Respondent skipped this question.
10. If this is something you are going to do, you need to have forced training that states what students make what cuts for what tests you want them to take. You also have to have your stuff together to have a plan of the school exceeds your 1% when following your set guidelines.
11. It sounds lovely. How does any of this help me teach kids?
12. Waste of time. A letter of explanation would suffice.
13. Funding for the local districts to be able to provide proper Tier I.
14. Respondent skipped this question.
15. As an online virtual public school with student access throughout the state of Michigan, it is not appropriate to set artificial percentage caps on special needs students, when our student population does not necessarily mirror the "typical" occurrence of special needs students found in a traditional geographic community. We do not get to choose who attends our school. The very nature of online public schools is predisposed to attracting a higher percentage of special needs students.
16. Any resource that support and promotes Tier 1 instruction will be useful to all. I think it might take these "experts" to see what they can do that has not already been tried.
17. Options of alternative assessments.
18. This part is good, simple work that means nothing...exactly what locals need (no sarcasm inserted).
19. Respondent skipped this question.
20. I think the in-person training would be a great asset to districts, but I worry what the time frame will be to get the training set up.
21. Please do away with this test. This test is a legal way to not educate a student. Most states do not offer an alternate assessment because they figure out a way to academically educate students with disabilities. You are hindering entire life outcomes by having this "test" available.
22. This test, as a whole is a life hinderance, allowing districts to not academically educate students. Please do away with it, all together, and believe in students with disabilities. All kids matter, including those with disabilities.



**PROMPT #4:**

Please comment on component: Create a tiered system of support Tier II for LEAs whose participation exceeds 2% or whose data indicates issues of disproportionality in state testing for students with disabilities. MDE will work with ISDs to provide support at this level:

1. I feel strongly that the wording should include the word AND, "...exceeds 2% and/or whose...". As a school district who hosts regional programs for students either mild or moderate cognitive impairments, we will never be under the 2%...no matter what supports are provided in this tiered system. We accept students from 7 school districts with mild or moderate cognitive impairments into our regional classrooms. The alternate assessment IS the most appropriate state assessment for the students in these classrooms. Because of our great programs, parents and families frequently request school of choice to our district so that their student is able to attend one of our categorical classrooms for students with cognitive impairments (5 this school year). I believe this speaks to the great work we do both with and for students. To mandate additional trainings, meetings, paperwork, etc. will only take away from what we are able to offer our students. The programming and eligibility of students MUST be a factor that is considered before we are "punished" for providing the appropriate assessments for students.
2. Same.
3. I am concerned that without looking further than the ISD/RESA the state will have a small lens to view the 2% districts.
4. Agree
5. When will you tell ISDs what this means?
6. Great idea - may need to address district size which can impact participation rates, as well as those districts that agree to provide services to severely disabled students at the local level rather than sending them to ISD programs
7. Must look at identification policies or lack there of
8. Respondent skipped this question.
9. Respondent skipped this question.
10. This is too late. If you wait until 2% is reached to show up, the school has failed those students according to your 1% rule and our inability to make the appropriate choice in test for our students. Show up day one. One person from MDE and the ISD to forced training and then make the final choice for what kids take what tests.
11. This sounds lovely, but I worry that many of the schools who have over 2% participation are simply doing the best they can for the kids who enroll. For example, many schools with a high poverty rate or certain charter situations have more severely impaired students enroll. I work in an online charter school, and we have many impaired students enroll who like and need the flexibility, especially to attend medical appointments. As a teacher, I feel pressured to make cognitively impaired students take tests that are above their ability level just to please whoever is enforcing ESSA. What if we could just make the right choice for each individual kid?
12. Again, is this where we should be spending our limited resources?

13. Funding is key. All districts will struggle to meet Tier II without proper supports/training that is necessary.
14. Respondent skipped this question.
15. As an online virtual public school with student access throughout the state of Michigan, it is not appropriate to set artificial percentage caps on special needs students, when our student population does not necessarily mirror the "typical" occurrence of special needs students found in a traditional geographic community. We do not get to choose who attends our school. The very nature of online public schools is predisposed to attracting a higher percentage of special needs students.
16. Why does this indicate "issues of disproportionality"? That makes no sense. Disproportionality is exhibited in far greater levels to those who exceed the expectations and are not challenged. We have special teachers, ungodly paperwork, logs, etc. for Tier 2 and 3 students. Let's get into the real world here!
17. Options of alternative assessments.
18. Go for it, still very vague (well done), but no one has a clue what the support would really look like or do. Should satisfy feds.
19. Respondent skipped this question.
20. I think it would be helpful for MDE to work directly with the districts as opposed to the ISD.
21. Please do away with this test. This test is a legal way to not educate a student. Most states do not offer an alternate assessment because they figure out a way to academically educate students with disabilities. You are hindering entire life outcomes by having this "test" available.
22. This test, as a whole is a life hinderance, allowing districts to not academically educate students. Please do away with it, all together, and believe in students with disabilities. All kids matter, including those with disabilities.

**PROMPT #5:**

Please comment on component: Create a tiered system of support Tier III for LEAs whose participation rates fall within the highest 3% of all participation rates in the state, or whose participation rate exceeds 2% and whose data indicates issues of disproportionality in state testing for students with disabilities. MDE will work with ISDs to provide support at this level.

1. Unsure. If there is a level of true consideration of both the eligibility AND programming for students (please see previous answer).
2. Same. I think more direct support is necessary for those districts with the highest numbers.
3. I would encourage the state to support districts to send back data to LEA's beyond students with agreements.
4. Agree.
5. No comment.
6. Great idea - same comments as above.
7. Remove funding if a district identifies this many student
8. Respondent skipped this question.
9. Respondent skipped this question.

10. This step should not have to happen. You are trying to latch on to a tier system when you need to just have set standards and people from MDE and ISDs at schools doing the forced training and decision making.
11. Same as tier II - please keep demographics in mind. Who enrolls matters.
12. Ditto
13. Again, funding will play a role with Tier III supports, as well as, outside agencies. At this level, multiple supports are necessary.
14. Respondent skipped this question.
15. As an online virtual public school with student access throughout the state of Michigan, it is not appropriate to set artificial percentage caps on special needs students, when our student population does not necessarily mirror the "typical" occurrence of special needs students found in a traditional geographic community. We do not get to choose who attends our school. The very nature of online public schools is predisposed to attracting a higher percentage of special needs students.
16. Respondent skipped this question.
17. Options of alternative assessments.
18. Not bad either...still vague, and no indication of what the support will be (which of course, no one knows what to do because we all recognize that you can't put some arbitrary limit on locals, ISDs, or even the state...not a shred of research behind it).
19. Respondent skipped this question.
20. Again, I think the MDE should work directly with districts that are at this high of a level to better understand why decisions were made to have this number of students to test with the alternate assessment.
21. Please do away with this test. This test is a legal way to not educate a student. Most states do not offer an alternate assessment because they figure out a way to academically educate students with disabilities. You are hindering entire life outcomes by having this "test" available.
22. This test, as a whole is a life hinderance, allowing districts to not academically educate students. Please do away with it, all together, and believe in students with disabilities. All kids matter, including those with disabilities.

**PROMPT #6:**

Other comments related to the development of the 1% CAP waiver:

1. I would again like to state that the programming and eligibility of students MUST/SHOULD be a factor...
2. Thank you for your guidance on this!
3. None.
4. Agree with applying for the waiver.
5. Respondent skipped this question.
6. Guidance documents, as well as acknowledging that some districts provide services to students severely cognitively impaired students at the local rather than ISD level will be helpful. Within the guidance documents it will also be helpful to include information for IEP teams on how to have conversations with parents about the state testing beginning in the early elementary grades (kindergarten). Having resource documents in a user-friendly format and location would also be helpful.

7. No one should be allowed to exceed one percent.
8. Please consider students and parents who do not want any part of these assessments. It has nothing to do with the LEAs it simply is the motivation of students and parents. I have just as many conversations with parents for students to take them vs. students not taking them. It simply has too much emphasis and has created this anti testing giant. Not wanting to be negative but there is a real disconnect with what the state is obligated to do and what is actually taking place within the LEAs.
9. If we look at the number of students who have an IEP compared to regular education students, what is this percentage? Of these students with an IEP what percentage of these students qualify for an alternative assessment? If it is over 1% why should we force these students to take an assessment they are not cognitively ready for? Sometimes it seems the Federal Government and/or the state have certain guidelines and rules but have forgotten the walk our students take in their shoes.
10. I want you to understand these comments may sound negative. They are. I want you to think about something. What if your child or grandchild was the last kid on the list. The school is at the 1% CAP. So instead of having them take the appropriate test, they cave to your ridiculous 1% and have your family take a test that has no meaning to them or their school. A test inappropriate for their learning and understanding of the growth they are making. Step outside of your office/cubicle and go to a school and have the conversation with that student who is the 1 student above the 1% and tell them why they should not take that test and take another one because of a rule you made about capping.
11. As a special education teacher, I am hopeful that someone at MDE is pushing back on the 1% CAP as part of the waiver process. Having a cap on a specific type of assessment seems to me to be similar to having a cap on certain types of services. It seems artificial, dishonest, and not in the best interest of the most vulnerable and needy kids.
12. Maybe we should be our efforts in to literacy, and getting kids reading. Or how about the NGSS? Or new Social Studies coming? Let's keep the focus on best preparing our kids for their future. Holding schools accountable for not testing the correct number of students determined by someone in Lansing will do nothing toward getting Michigan in the top 10 of anything.
13. Without hesitation, renewing the waiver for alternate assessment is vital. Many students need to have access to this type of assessment, as it is what is best for them.
14. This looks good. This might be problematic for schools who run center problems as I think it will be hard for them to get below the 1% CAP.
15. As an online virtual public school with student access throughout the state of Michigan, it is not appropriate to set artificial percentage caps on special needs students, when our student population does not necessarily mirror the "typical" occurrence of special needs students found in a traditional geographic community. We do not get to choose who attends our school. The very nature of online public schools is predisposed to attracting a higher percentage of special needs students.
16. Respondent skipped this question.

17. If a district doesn't take advantage of students taking an alternative assessment, I feel the IEP team knows the student the best and can make an informed decision on which state assessment is appropriate.
18. Best of luck. I know you folks have a tough job responding to this type of nonsensical crap. I support you, as long as you stay grounded in reality.
19. School districts should not use the results from these innovative tests to evaluate teachers.
20. I think it is important to keep in mind that when you have one district housing multiple special ed programs there is a good possibility their numbers will naturally be higher.
21. This test ruins lives.
22. This test, as a whole is a life hinderance, allowing districts to not academically educate students. Please do away with it, all together, and believe in students with disabilities. All kids matter, including those with disabilities.

The MDE appreciates the input from public comments. All the above ideas will be considered, and when allowable, be incorporated into the plan. Based on some common threads, the MDE would also like to add the following responses:

1. Although there are a variety of data sets that can be considered to provide research and documentation regarding the validity of a 1% CAP, the State of Michigan is required to follow federal guidance and reporting requirements.
2. Michigan continues to underscore the requirement that IEP teams must be the group to determine what assessment a student participates in. The MDE will continue to work with all districts to ensure IEP teams have the proper training and tools to make appropriate decisions.
3. The department is working to substantiate that the decision-making resources are utilized by all IEP teams to ensure that students' academic competences are being measured with the appropriate assessment tool.
4. There is no penalty for an ISD, LEA or PSA who exceeds the 1% CAP. Justification is required from the district so the ISD and MDE can determine if technical assistance is needed to ensure students take the appropriate assessment.
5. The State of Michigan is required to follow federal guidance and reporting requirements specific to the 1% CAP.
6. The State of Michigan is cognizant of the many students for whom an alternate assessment is necessary and will continue to provide a valid and reliable assessment to meet their needs. There is evidence to suggest that not all students who currently participate in the alternate assessment are appropriately determined. The purpose of a statewide plan is to ensure that students who are taking the alternate assessment meet the guidelines for participation.

**Requirement #1: Submit the waiver request at least 90 days before the testing window starts for the relevant subject.**

The testing window for all state summative assessments in Michigan begins on April 8, 2019. Specifically, the testing window for MI-Access (the state summative AA-

AAAS) is from April 8, 2019 through May 24, 2019. This is a seven-week testing window.

**Requirement 2 (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.**

*Table 1: 2017 – 2018 Participation in Alternate Assessment, MI-Access, by Content Area and Demographic Sub-Group*

Demographic Sub-Group	Number of Students Tested using an Alternate Assessment	Total Number of Students Tested	Percent of students Tested using an Alternate Assessment
English Language Arts (Grades 3-8 and 11)			
<b>All Students</b>	<b>16,958</b>	<b>765,602</b>	<b>2.2%</b>
Male	11,275	391,695	2.9%
Female	5,683	373,907	1.5%
English Learner	1,081	52,521	2.1%
Economically Disadvantaged	12,014	400,099	3.0%
Native American	143	4,859	2.9%
Asian	304	25,802	1.2%
African American	4,615	133,661	3.5%
Hispanic	1,283	60,210	2.1%
Pacific Islander	24	618	3.9%
White	9,929	510,584	1.9%
Multi-Racial	660	29,868	2.2%
Mathematics (Grades 3-8 and 11)			
<b>All Students</b>	<b>16,688</b>	<b>766,413</b>	<b>2.2%</b>
Male	11,025	392,095	2.8%
Female	5,663	374,318	1.5%
English Learner	1,062	53,727	2.0%
Economically Disadvantaged	11,792	400,411	2.9%
Native American	141	4,853	2.9%
Asian	300	26,251	1.1%
African American	4,554	133,543	3.4%
Mathematics Continued (Grades 3-8 and 11)			
Hispanic	1,248	60,488	2.1%
Pacific Islander	24	623	3.9%
White	9,770	510,804	1.9%
Multi-Racial	651	29,851	2.2%
Science (Grades 4, 5, 7, 8 and 11)			
<b>All Students</b>	<b>6,746</b>	<b>339,001</b>	<b>2.0%</b>
Male	4,501	173,435	2.6%
Female	2,245	165,566	1.4%
English Learner	420	19,739	2.1%
Economically Disadvantaged	4,662	168,533	2.8%
Native American	60	2,130	2.8%

Asian	110	11,572	1.0%
African American	1,776	55,434	3.2%
Hispanic	480	25,078	1.9%
Pacific Islander	10	281	3.6%
White	4,067	225,730	1.8%
Multi-Racial	243	11,615	2.1%

**Requirement 2 (B): Provide State-level data from the current or previous year that shows the overall assessment participation rate for all students and for students with disabilities.**

*Table 2: 2017 – 2018 Total Students Participating in State Summative Assessment (M-STEP, MME, MI-Access), by Content Area and Demographic Sub-group*

Demographic Sub-Group	Number of Students with Valid Tests	Number of Students Expected to Test	Percent of Students Participating in State Tests
<b>English Language Arts (Grades 3-8 and 11)</b>			
<b>All Students</b>	<b>761,635</b>	<b>773,307</b>	<b>98.5%</b>
Students with Disabilities	96,534	99,434	97.1%
Male	389,413	395,894	98.4%
Female	372,222	377,413	98.6%
English Learner	52,491	54,393	96.5%
Economically Disadvantaged	396,590	404,488	98.1%
Native American	4,798	4,914	97.6%
Asian	25,842	26,482	97.6%
African American	132,940	135,996	97.8%
Hispanic	59,865	60,960	98.2%
Pacific Islander	607	626	97.0%
White	507,980	514,316	98.8%
Multi-Racial	29,603	30,013	98.6%
<b>Mathematics (Grades 3-8 and 11)</b>			
<b>All Students</b>	<b>763,265</b>	<b>773,307</b>	<b>98.7%</b>
Students with Disabilities	97,170	99,434	97.7%
Male	390,351	395,894	98.6%
Female	372,914	377,413	98.8%
English Learner	53,730	54,382	98.8%
Economically Disadvantaged	397,586	404,488	98.3%
Native American	4,807	4,914	97.8%
<b>Mathematics Continued (Grades 3-8 and 11)</b>			
Asian	26,275	26,482	99.2%
African American	133,107	135,996	97.9%
Hispanic	60,178	60,960	98.7%
Pacific Islander	613	626	97.9%
White	508,670	514,316	98.9%
Multi-Racial	29,615	30,013	98.7%
<b>Science (Grades 4, 5, 7, 8 and 11)</b>			

<b>All Students</b>	<b>331,670</b>	<b>339,171</b>	<b>97.8%</b>
Students with Disabilities	40,505	42,506	95.3%
Male	169,512	173,502	97.7%
Female	162,158	165,669	97.9%
English Learner	19,341	9,743	98.0%
Economically Disadvantaged	163,413	168,614	96.9%
Native American	2,130	2,207	96.5%
Asian	11,572	11,707	98.9%
African American	55,434	57,587	96.3%
Hispanic	25,078	25,681	97.7%
Pacific Islander	281	293	95.9%
White	225,730	229,812	98.2%
Multi-Racial	11,615	11,884	97.7%

**Requirement 3 (A): Provide assurance that districts over 1.0 percent participation in the alternate assessment followed the state’s participation guidelines.**

During the review of LEA justification for LEAs that tested more than 1% of students using the alternate assessment, the majority of LEAs indicated they were using the state guidelines for participation in the alternate assessment or had recently made this a priority. For any schools indicated they were not using the guidelines, feedback was provided to the ISD to work with the LEA to understand that these guidelines were not optional. There were many comments indicating a need for more state level professional development to guide IEP teams. This training has been provided and there are two training modules reside on Michigan’s alternate assessment web site. Further comments indicated the additional clarification given with added second page in March of 2018 was very helpful to understand what is meant by a student who “functions as if he or she has a significant cognitive impairment.” Adherence to the state guidelines for IEP teams remains a focus for review and monitoring for districts assessing more than 1% of students using the alternate assessment. Please see the response to requirement 4 below regarding the implementation of the 2018 waiver plan which further outlines the steps taken.

**Requirement 3(B): Provide assurance that any disproportionality in students taking the alternate assessment will be addressed.**

Michigan examined disproportionality in participation on its state Alternative Assessment (MI-Access) for the following demographics:

1. Gender
  - a. Male
  - b. Female
2. Economic Disadvantage (based on poverty risk factors such as free lunch eligibility, homelessness, migrant status, and direct certification for government food assistance)
  - a. Disadvantaged
  - b. Not Disadvantaged
3. The following Racial/Ethnic groups:
  - a. Native American



- b. Asian
  - c. African American or Black
  - d. Pacific Islander
  - e. Hispanic
  - f. White
  - g. Two or More Races
4. English Language Learners Status.
- a. Participating in a Learning English Program
  - b. Not participation in a Learning English Program

To determine whether substantive disproportionality of students occurred, Michigan will use a Relative Risk Ratio method to analyze the rate of participation in alternative assessments. For other federal reporting, (i.e., in the Annual Performance Report), Michigan uses multiple years of data and a threshold Risk Ratio of 2.5 for each demographic subgroup. For assessments, this threshold means students in one demographic are participating in the alternative assessment at a rate of 2.5 times more often than students who are not in that demographic. A relative Risk Ratio of 1.0 means students in one demographic participate in the alternative assessment at the same rate as students who are not a part of the demographic.

Michigan will examine 2 consecutive years of test participation in Math and English Language Arts. Districts assessing the same sub-group at 2.5 times more often than students who are not in that sub-group, will be flagged for more targeted supports and review. These findings will be shared with ISDs and districts to review as part of their targeted guidance, and ISD staff will be trained to identify and target districts with substantively high disproportionate use of alternative assessments. In order for districts to be included in the disproportionality analyses and identification process, 2 minimum N-sizes will be employed for each year of data:

- 1) Districts with 30 or more total students tested using the Alternate Assessment will be examined for over-assignment;
- 2) For any demographic sub-group, a district must have at least 10 students tested using the Alternate Assessment in order to be evaluated on over-assignment for that sub-group.

Statewide, Michigan has identified one demographic (i.e., the economically disadvantaged) with elevated risk ratios, but none exceeding the threshold of 2.5 times higher than students not in the sub-group. See Tables 3-5 for statewide results in School Year 2017-18.

Table 3: Disproportionate Alternate Assessment Participation by Demography (SY 2017-2018) for English Language Arts

Simple Groups	Group Rate Comparison (In-group vs not)	Risk Ratio
Male vs Female	2.9% vs 1.5%	1.93
Economic Disadvantaged	3.0% vs 1.4%	2.14*
English Language Learner	2.1% vs 2.2%	0.95
Multi-Groups: Race/Ethnicity	Group Rate Comparison (In-group vs not)	Risk Ratio
Native American	2.9% vs 2.2%	1.32
Asian	1.2% vs 2.3%	0.52
African American	3.5% vs 2.0%	1.75
Hispanic	2.1% vs 2.2%	0.95
Pacific Islander	3.9% vs 2.2%	1.77
White	1.9% vs 2.8%	0.68
Two or More Races	2.2% vs 2.2%	1.00

**Note:** \* = Risk Ratio  $\geq 2.0$ , \*\* = Risk Ratio  $\geq 2.5$ . Relative Risk Ratios of 2.50 or above are considered disproportionately high representation among students taking the alternate assessment.

Table 4: Disproportionate Alternate Assessment Participation by Demography (SY 2017-2018) for Math

Simple Groups	Group Rate Comparison (In-group vs not)	Risk Ratio
Male vs Female	2.8% vs 1.5%	1.87
Economic Disadvantaged	2.9% vs 1.3%	2.23*
English Language Learner	2.0% vs 2.2%	0.91
Multi-Groups: Race/Ethnicity	Group Rate Comparison (In-group vs not)	Risk Ratio
Native American	2.9% vs 2.2%	1.33
Asian	1.1% vs 2.2%	0.50
African American	3.4% vs 1.9%	1.79
Hispanic	2.1% vs 2.2%	0.95
Pacific Islander	3.9% vs 2.2%	1.77
White	1.9% vs 2.7%	0.70
Two or More Races	2.2% vs 2.2%	1.00

**Note:** \* = Risk Ratio  $\geq 2.0$ , \*\* = Risk Ratio  $\geq 2.5$ . Relative Risk Ratios of 2.50 or above are considered disproportionately high representation among students taking the alternate assessment.

Table 5: Disproportionate Alternate Assessment Participation by Demography (SY 2017-2018) for Science

Simple Groups	Group Rate Comparison (In-group vs not)	Risk Ratio
Male vs Female	2.6% vs 1.4%	1.86
Economic Disadvantaged	2.8% vs 1.2%	2.33*
English Language Learner	2.1% vs 2.0%	1.05
Multi-Groups: Race/Ethnicity	Group Rate Comparison (In-group vs not)	Risk Ratio
Native American	2.8% vs 2.0%	1.40
Asian	1.0% vs 2.0%	0.50
African American	3.2% vs 1.8%	1.78
Pacific Islander	3.6% vs 2.0%	1.80
Hispanic	1.9% vs 2.0%	0.95
White	1.8% vs 2.4%	0.75
Two or More Races	2.1% vs 2.0%	1.05

**Note:** \* = Risk Ratio  $\geq 2.0$ , \*\* = Risk Ratio  $\geq 2.5$ . Relative Risk Ratios of 2.50 or above are considered disproportionately high representation among students taking the alternate assessment.

**Requirement 4 (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 impairments” in future school years.**

The plan for improvement outline in the 2017-2018 year included the following components. Please see Requirement 5 of this document for rationale on substantial progress. This section will outline how each component was met and each part of Requirement 4 will include updates to the plan for 2018-2019.

**Component 1:** Provide Intermediate School Districts (ISDs) and Local Education Agencies (LEAs) data regarding the participation rates for students taking MI-Access (State provides data to ISDs and ISDs disseminate to LEAs).

- 2016-2017 data was provided to ISDs at a state-level ISD Special Education Director’s meeting on November 8, 2017. ISDs then disseminated the data to LEAs in December of 2017.
- 2017-2018 data was provided to ISDs at a state-level ISD Special Education Director’s meeting on November 14, 2018 and further, data for ISD and LEA data was uploaded for ISD access to the special education data system: Catamaran. On December 7, 2018, follow up data was provided to 14 additional ISDs (representing 42 LEAs) regarding LEAs whose data indicates disproportionality for participation on MI-Access so that their local plans can include how this will be addressed.

**Component 2:** Provide justification form for districts that currently exceed 1% participation on MI-Access, to provide feedback to the ISDs and MDE as to why they exceed this rate and their plan to address the issue.

- A Justification form for LEAs for 2016-2017 data was added to the MI-Access web page ([www.michigan.gov/mi-access](http://www.michigan.gov/mi-access)) on January 4, 2018

with a due date to ISDs by February 15, 2018. Communication to ISDs and LEAs followed using the MDE *Spotlight on Student Assessment* weekly newsletter with reminders sent in subsequent issues.

- A justification form for LEAs for 2017-2018 data was added to the MI-Access web page on November 14, 2018 with a due date to ISDs by January 15, 2019. Communication to ISDs and LEAs followed using the MDE *Spotlight on Student Assessment* weekly newsletter with reminders sent in subsequent issues.
- Based on data received from the 2016-2017 data summaries, the summary form for LEAs was revised in November of 2018 for more specificity in data collected.
- Feedback and guidance provided to ISDs and LEAs is further defined in components 3 and 4 below.

**Components 3 and 4:** Provide guidance for holding discussions and data review for LEAs on the 1% CAP and provide a template for collecting LEA level data for ISDs to use in structuring support and technical assistance.

- A guidance document was developed for ISDs on providing support to LEAs on reviewing 1% CAP data. This was one of the first support documents completed and was posted August 4, 2017 and disseminated to ISD and LEA Special Ed Administrators at the annual Michigan Association of Administrators of Special Education Conference during an AA-AAAS session. ([https://www.michigan.gov/documents/mde/1\\_Cap\\_Guidance\\_for\\_ISDs\\_595801\\_7.pdf](https://www.michigan.gov/documents/mde/1_Cap_Guidance_for_ISDs_595801_7.pdf)).
- An ISD Summary form template was developed for ISDs to summarize the trends found within their ISD for reporting to the state. This form for 2016-2017 was posted on February 2, 2018 with a due date to the state (along with all LEA data) by March 9, 2018. The template form for ISD was posted December 20, 2018 with a due date to the state (along with all LEA data) by February 8, 2019.
- For the 2016-2017 justification data collection, MDE received 100% of expected responses (there were no LEAs missing from the review).
- MDE's 1% CAP team reviewed all ISD summaries and LEA justification forms from across the state (approximately 900 forms). Trends in the responses were identified and intentional and individual feedback was given to each ISD on topics for each LEA that may be relevant relative to targeted support and professional development. This review of justification forms began on March 9, 2018 and all feedback provided by May 22, 2018. ISDs then provided relevant feedback to LEAs, providing additional training and support to school teams as necessary.
- Based on data received from the 2016-2017 data summaries, the summary form for ISDs was revised in December of 2018 for more specificity in data collected.
  - Component #5: Provide state-level training that will include, but not limited to:
- Online accessible training on the assessment selection guidance for special education staff and IEP team members.
- Two online resources were completed and posted to the MI-Access web page on August 30, 2018.

- Assessment Selection Guidelines Training, including application to six case-studies:  
<https://mdoe.state.mi.us/mdedocuments/AssessmentSelectionGuidelinesTraining/index.html>
- Tool for IEP teams: Interactive Decision-Making Tool:  
<https://mdoe.state.mi.us/MDEDocuments/InteractiveDecision-MakingTool/index.html>
- In-person training on assessment selection, assessment supports and accommodations and understanding alternate content standards:
- Michigan Association of Administrators of Special Education (MAASE) Summer Leadership Retreat (August, 2017; August, 2018)
- Michigan Association of Administrators of Special Education – Supervisors of Low Incidence Programs (January 2018; January 2019)
- Michigan State Testing Conference (February, 2018; February, 2019)
- Michigan Council for Exceptional Children Conference (March 2018)
- Wayne RESA – for Wayne RESA constituent LEAs (February, 2018)
- Oakland Schools – for Oakland ISD constituent LEAs (April, 2018)
- Clinton County RESA – for MAASE Community of Practice (June, 2018)
- Letter to Superintendents from MDE leadership to raise awareness of the 1% CAP (November, 2017)
  - Component 6: Work with interested parties to further define what it means, in consideration of alternate assessment participation, for a student to function as if they have a significant cognitive impairment.
- Outcome: Added a second page to the assessment selection guidance document  
([https://www.michigan.gov/documents/mde/Should\\_My\\_Student\\_Take\\_the\\_Alternate\\_Assessment\\_556705\\_7.pdf](https://www.michigan.gov/documents/mde/Should_My_Student_Take_the_Alternate_Assessment_556705_7.pdf)), that includes factors to consider and factors not to use as primary in decision making relative to determining if a student functions as if he or she has a significant cognitive impairment. This second page was added on March 9, 2018.

**Requirement 4 (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.**

Each ISD implements monitoring procedures and evaluation methods developed by the department to ensure the standards and criteria established are being achieved by the ISD, their constituent districts, and their public school academies (PSAs). References in this document to LEAs includes local districts and PSAs. In addition to ISD developed oversight of participation in the alternate assessment, MDE has established a three-tier system of support to provide additional oversight and support to LEAs assessing more than 1% of students using the alternate assessment.

- Tier I for all would include additional:
- communications for the training currently available online as developed for the 2017-2018 plan.
- in-person training on assessment selection as requested by ISDs or LEAs.

- resources developed by MDE, ISDs or LEAs for others to access and use (such as developing standards based IEPs based on alternate content standards).
- Tier II for LEAs whose participation exceeds 2% or whose data indicates issues of disproportionality in state testing for students with disabilities.
- ISDs will provide a list of LEAs that require support at this level as well as the plan that will be carried out by the ISD.
- Tier III for LEAs whose participation rates fall within the highest 3% of all participation rates in the state, or whose participation rate exceeds 2% and whose data indicates issues of disproportionality in state testing for students with disabilities.
- Individual plans for support will be developed for these LEAs will be completed by both ISD and MDE personnel with timelines set for review for both implementation and outcomes.
- Any LEA falling within Tier II or Tier III that is currently an MDE Partnership District will have their plan developed in cooperation with district liaisons from the MDE Office of Partnership Districts.

**Requirement 4 (C): Submit a plan and timeline by which the state will address any disproportionality in the percentage of students taking the alternate assessment.**

At the state level, there are no sub-groups in which the risk-ratio would indicate a concern with disproportionality regarding participation in the alternate assessment. 42 districts within the state have been identified as having risk ratios for a particular sub-group indicating an issue with disproportionality that needs to be considered for further discussion. This additional data set was sent to the affected ISDs on December 7, 2018. ISDs will facilitate conversations with all of their affected LEAs on the disproportionality list. In addition, any LEA that has assessed more than 1% of all students using the alternate assessment will need to submit their plan to address that disproportionality in their justification forms due to their ISD by January 15th.

**Requirement 5: Demonstrate substantial progress toward each component of the prior year's plan and timeline, which was required under Requirement 4 (c).**

Michigan has made substantial progress toward implementing the plan developed for 2017-2018. All components outlined were met. Details of how each component was met is found within the answers to requirement 4. Michigan has included an ISD special education administrator to act in the capacity of advisor to the MDE 1% CAP team. This advisor, along with the MDE 1% CAP team presented information about the data and action taken during the 1% CAP convening meeting in Boston in October of 2018 after being invited to do so by the National Center on Educational Outcomes. In addition to all components having been met, MDE has expanded the plans for improvement for 2018-2019 by adding a three-tier system of support as outlined in Requirement 4 (B). As outlined in Requirement 2, in all content areas, the participation rates from 2016-2017 to 2017-2018 were reduced by 0.2% in English language arts and mathematics and 0.3% in science.

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January 9, 2019

Based on the timing of released professional development tools, MDE predicts there will be a further reduction in participation rates over the next two years.

Sincerely,

A handwritten signature in black ink that reads "Sheila A. Alles". The signature is fluid and cursive, with a large initial 'S'.

Sheila A. Alles, Interim State Superintendent  
Michigan Department of Education

Attachments

cc: Michigan Education Alliance  
[oss.michigan@ed.gov](mailto:oss.michigan@ed.gov)