March 13, 2024

The Honorable Michael F. Rice  
State Superintendent  
Michigan Department of Education  
608 W. Allegan Street, P.O. Box 30008  
Lansing, MI 48909

Dear Superintendent Rice:

I am writing in response to the Michigan Department of Education’s (MDE’s) request on January 9, 2024, for a one-year waiver of section 1111(b)(2)(D)(i)(I) of the Elementary and Secondary Education Act of 1965 (ESEA), which stipulates that a State may not assess more than 1.0 percent of all students in the grades assessed using an alternate assessment aligned with alternate academic achievement standards (AA-AAAS). MDE requested this waiver because, based on State data for the 2022-2023 school year, MDE has concluded that it may need to assess more than 1.0 percent of students using an AA-AAAS in reading/language arts (R/LA), mathematics, and science in the 2023-2024 school year.

After reviewing MDE’s request, I am declining to exercise my authority under section 8401(b) of the ESEA for a one-year waiver for the 2023-2024 school year of section 1111(b)(2)(D)(i)(I) of the ESEA so that the State may assess more than 1.0 percent of students with an AA-AAAS in R/LA, mathematics, and science. I am declining the request because I do not find that approving the waiver will advance student academic achievement, as required in ESEA section 8401(b)(1)(C). Michigan assessment data for the 2022-2023 school year show that rates of AA-AAAS participation have increased in R/LA, mathematics, and science when compared to the 2021-2022 school year and the rates are well above 1.0 percent. In addition, MDE did not meet the following requirements for waivers of the 1.0 percent cap on AA-AAAS participation:

- 34 CFR § 200.6(c)(4)(ii), which requires the State to assess at least 95 percent of all students and 95 percent of all students with disabilities in each required subject. Based on MDE’s submission, the State did not meet the 95 percent threshold for all students with disabilities in science.
- 34 CFR § 200.6(c)(4)(iv)(A), which requires a plan and timeline by which the State will improve the implementation of its guidelines for participation in the AA-AAAS.
- 34 CFR § 200.6(c)(4)(iv)(B), which requires that the State will take additional steps to provide oversight to LEAs that exceed the 1.0 percent cap.

In addition, the Department notes that the plan MDE submitted is substantially the same as the plan submitted in the prior year. Given the lack of progress to date, the Department does not believe the plan is sufficient for MDE to address the high rates of students taking the AA-AAAS.
Because MDE’s rates of participation on the AA-AAAS in the 2022-2023 school year were well above the 1.0 percent cap (i.e., above 1.70 percent in all three subject areas), the Department is placing a condition on the State’s fiscal year 2023 Title I, Part A grant award. To remove this condition, MDE must:

1. Within 60 days of receipt of this letter, submit an updated plan for reducing the rate of AA-AAAS participation in future years in order to come into compliance with the 1.0 percent requirement. Please submit Michigan’s plan to ESEA.Assessment@ed.gov.
2. Submit evidence that the plan and timeline are made publicly available on the State’s website when the plan is provided to the Department.
3. Demonstrate substantial progress in reducing the percentage of students tested on alternate assessments in the 2023-2024 school year as validated by the MDE EDFacts assessment participation data submission.

If MDE can demonstrate that current the rate of participation on the AA-AAAS has in fact declined, and how granting this waiver would contribute to improved student achievement and is in the public interest, MDE may revise its waiver request, consistent with section 8401(b)(4)(B)(ii) of the ESEA, to meet the requirements under 8401(b)(1)(C) and (F) and 34 CFR § 200.6(c)(4)(ii) and (iii). The revised waiver request must be submitted no later than 60 days from the date of this letter.

I appreciate your work to improve Michigan’s schools and provide a high-quality education for your students. If you have any questions, please contact my staff at ESEA.Assessment@ed.gov.

Sincerely,

/s/

Adam Schott
Principal Deputy Assistant Secretary
Delegated the Authority to Perform the Function and Duties of the Assistant Secretary
Office of Elementary and Secondary Education

cc: Jerry Cullum, Education Research Consultant
    Andrew Middlestead, Director of Assessment and Accountability
January 9, 2024

Office of Elementary and Secondary Education Assessment Team
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202
ESEA.Assessment@ed.gov

Dear Office of Elementary and Secondary Education Assessment Team,

The federal Every Student Succeeds Act (ESSA) caps the percentage of students who can take the alternate assessment at 1.0 percent of the total students tested. The ESSA also allows states that may exceed the 1.0 percent cap to apply for a one-year waiver. This document serves as Michigan Department of Education’s (MDE) formal request for a waiver approval through Spring 2024. The waiver approval will allow MDE and local education agencies (LEAs) around the state to continue working to ensure appropriate assessment selection for students with disabilities and further reduce participation numbers for Michigan’s alternate assessment to meet the 1.0 percent cap requirement.

ESSA 1% Cap on Alternate Assessment Use Waiver History

Michigan applied for and was granted the initial waiver on May 14, 2018. In 2019, 2021, and 2022, MDE applied for and was granted an extension to the initial waiver by the U.S. Department of Education (USED). Michigan’s 2020 waiver request was rescinded when USED waived assessment requirements due to the COVID-19 pandemic and subsequent school closures. In early 2023, Michigan applied for a renewed waiver, which was denied, due to slightly fewer than 95 percent of all students with disabilities participating in statewide summative assessments for each subject.

As part of the past approved waivers, MDE agreed to implement a plan to ensure students with disabilities are properly assessed using the state assessment system programs. MDE’s implementation of this plan resulted in a consistent annual decrease in overall alternate assessment participation rates from 2017-22. In 2023, Michigan’s overall participation rate for students with disabilities is once again meeting the
95 percent overall threshold for the subjects of English Language Arts (ELA) and Mathematics, but our alternate assessment participation rates have remained steady at 1.8% to 1.9%, similar to levels observed in 2022. We are fully implementing several of our improvement efforts offered in the 2023 waiver request, including following best practices used in other states, including targeted district monitoring and evaluation of criteria for the appropriate use of alternate assessments and instructional standards, as well as introducing warnings in the test registration for student level cases at higher risk for noncompliance.

However, MDE anticipates exceeding the 1.0 percent cap in 2024.

A review of our data, participation rates and student demographic data, suggests that to reduce our alternate assessment rate further will require better disambiguating students with milder intellectual impairments from those with more significant ones. To date, many of our reductions in rates have come from students with higher incident/milder disabilities participating in more appropriate assessment and having greater access to general grade level instruction. To make further gains, Michigan will be providing more monitoring and evaluation of the separate criteria needed to determine that a student has the most significant cognitive disability and is receiving instruction where the highest level of summative educational goals is based on alternate content expectations, in order to be eligible for the use of alternate assessments.

MDE communicated to the public its intent to request a waiver approval to exceed the 1.0 percent cap on alternate assessment participation in 2024. The state superintendent of public instruction sent a memorandum to local and intermediate school district (ISD) superintendents and public-school academy (PSA) directors, ISD and LEA/PSA special education directors, and the statewide education associations.

As required, MDE gathered related public comment, through an online questionnaire. The public comment period was open from November 15- December 17, 2023. Michigan had fourteen total respondents who provided public comment on open-ended prompts regarding the waiver activities and Michigan’s plan to come into compliance with the 1.0 percent cap.

These respondents included a group of 7 nearly identical responses discussing ISD/district staff activities that were sent around the same time frame. Additionally, one organizational response from the Autism Alliance of Michigan was received. Not all prompts received responses from all respondents.

Below are the public comment request prompts, followed by the public comments to each prompt. Following that, MDE is providing in this waiver a summary response to the public comments. Please note that, with the exception of specific names of places or people, the comments were copied exactly as written:
Prompt #1

MDE completed the following activities related to alternate assessment selection and the 1.0 percent cap during the 2022–23 academic year:

- Made District and ISD Spring 2023 alternate assessment participation rate data available on the special education electronic monitoring system.
- Provided universal professional development and technical assistance resources to special education administrators, teachers, related service providers, and parents.
- Directed local education agency staff to an online, interactive decision-making tool to assist with appropriate assessment selection and curriculum alignment.

Additionally, Michigan provided the following tiered professional development and technical assistance with districts and ISDs:

- Performed a verification activity for districts in Tier 2 and Tier 3, focusing on student cases flagged for high risk of noncompliance with the requirements for being eligible for using alternate content standards in summative assessments. Flagged cases involved students for whom either the primary disability type, general education instructional levels, and/or past performance on alternate assessments, suggest the student may not have the most significant cognitive disability or the majority of the student's instruction and goals are not primarily aligned to the alternate content expectations for which alternate assessments are based. For Tier 2 districts, the verification process occurred with the ISDs, and for the Tier 3 districts, summaries of the verification results, including the district’s criteria, evidence, and thresholds used to determine the student is actually eligible for the use of alternate standards in assessments, were reported back to MDE to consolidate into further guidance and feedback for ISDs.
- For students surpassing Functional Independence levels of alternate standards at a Tier 2 or Tier 3 district, a review of the educational benefit and content expectations used to educate the student by was requested to be conducted with the district. “Surpassed the Standards” is the “advanced” performance level for MI-Access.

Prompt 1 Comments:

Response 1: Autism Alliance of Michigan COMMENT: It is clear from the alternate assessment (AA) participation rate data contained in the waiver request that Michigan’s activities to address and reduce AA participation have been largely ineffective. In fact, in 2023 AA participation rate in ELA actually increased from 1.8% to 1.9%.

Michigan assigns more students with disabilities to its AA than almost any other state in the nation. It also has one of the highest rates of proficiency on its AA of any state. These high rates of proficiency serve as a powerful incentive to include
students in the state’s AA, making it all the more important that Michigan take steps to reach and maintain compliance with ESSA’s 1% cap on alternate assessments. Michigan’s failure to reduce the rate of AA participation means that thousands of students with disabilities are being funneled to an assessment with much lower expectations, exposure to the general education academic content standards, and limited access to satisfy the requirements for a regular high school diploma.

Michigan also failed to test at least 95% of students with disabilities in 2022-2023 in Science – assessing just 92.7% compared to 94.9% in 2021-2022. The failure to assess at least 95% of students with disabilities was the reason the US Dept of Education denied Michigan’s waiver request for 2022-2023. With an even lower assessment rate in 2022-2023 and an increase in test participation in ELA and no reduction in Math and Science, Michigan’s waiver request for 2023-2024 is sure to be denied.

One of the factors driving Michigan’s high AA participation rate is very likely the assortment of AAs offered by the state: MI-ACCESS Functional Independence (FI), MI-ACCESS Supported Independence (SI) and MI-ACCESS Participation (P). It is highly likely that many students assigned to the MI-ACCESS Functional Independence (roughly half of all SWDs assigned to an AA) should, in fact, be assessed on Michigan’s regular assessment.

Michigan appears to be questioning the appropriateness of AA assignment, stating in its draft request “There continues to be evidence to suggest that not all students who currently participate in the alternate assessment were appropriately determined.” (page 5) And furthermore, stating “A review of our data, participation rates, and student demographic data suggests that reducing our alternate assessment rate further will require better disambiguating students with milder intellectual impairments from those with more significant ones.” (page 2).

Below are several additional recommended activities for the 2023-2024 school year that we offer:

1. Michigan should engage in several in-depth data reviews in order to establish the impact of the various AAs currently being offered. These would include (a) examine the participation rate for each of the AAs, (b) further examine participation rate for each AA by disability category (making this disaggregated data publicly available) and (c) further examine participation rate for each AA by student subgroup.

2. Michigan should assemble an Alternate Assessment Advisory Group to review all current resources and make recommendations for new or improved resources. Such a group should include representatives of state disability organizations (Autism Alliance of Michigan, The Arc, etc.), the state’s parent training and information center (Michigan Alliance for Families), the state protection and advocacy organization (Disability Rights Michigan).

3. Michigan should further collaborations with the Michigan Alliance for Families including providing supplemental funding to support the
development and dissemination of information on the alternate assessment. Currently the only information offered on the Michigan Alliance for Families website involves links to information on the MDE website.

4. Michigan should develop information on transitioning from the AA to the general assessment.

5. Michigan should enhance its current resource for IEP team decision making.

See, for example, Ohio’s Alternate Assessment Participation Decision-Making Tool at: [Ohio’s Alternate Assessment Participation Decision-Making Tool]

Summary of proposed amendments related to Question 1:

a. Resetting long-term goals and measures of interim progress, also known as School Index targets, to use data from 2021-22. Existing targets reflected pre-pandemic performance and are set to expire after the 2024-25 school year. Refreshing the targets with 2021-22 data reflects the impact of the pandemic on Michigan’s students. Updating the schedule of identifying schools for support.

b. Updating supporting data for the School Quality/Student success measures. Existing data supporting these measures dates to almost a decade ago. Refreshing the plan with more recent data helps to show how these measures continue to be valid post-pandemic.

Response 2: The universal tools and training are very helpful to ISDs and districts. The timeframe between providing the “flagged” students to ISDs and the next test cycle is very small. In 2023, the flagged student data wasn’t shared until February. Trying to effect change before the next test cycle in April was far too narrow a timeframe. That timeline was narrowed even further by sharing flagged cases with only the ISD, and not districts directly. The spreadsheet shared with ISDs was cumbersome to work through (and analyze) and also came in a format that could not be reproducible given the security features embedded into the spreadsheet. This required ISDs to create new district level spreadsheets that was very time consuming.

It is requested that “flagged” students are provided directly to districts within their justification form, along with required activities already loaded in their Local Plan. This will remove the back and forth aspect of having to submit justification forms and then wait several months to get feedback from MDE. It is also requested that the disproportionality data be included in their justification form, for the same reasons mentioned.

Response 3: We have a problem with bullet two, regarding universal PD and TA. Taking a look at just [our Regional ISD] area, it appears all of the so-called PD occurred on school days for each district, not PD days where more emphasis could be put on the content. Which means this universal development was done in approximately 30 minutes to maybe one hour. Not nearly enough time to instill the importance of this topic and training needed to make solid decisions. Further, the districts in [our] area are absolutely not using the decision-making tool for selection.
The verification activity did NOT flag many students that are being tested using alternate assessments who do not have the most significant cognitive disability. The review of educational benefit should be conducted by a neutral party, not anyone involved with and currently working with the district. While these are all great ideas in theory, they are extremely biased towards meeting the districts goals and priorities. To make this process effective, there needs to be an outside company performing these duties.

**Response 4:** Michigan's universal materials could use some updating and improvement to reflect the lessons that we as ISDs learned over the past year or so and such updates should reflect the increased emphasis on getting valid data and measurement for determining which students have the most significant cognitive disability and who would be eligible for alternate assessments. The rules and guidelines are still far too loose and vague and as a direct result, Michigan continues to educate far too many of its students with disabilities based low standards and expectations. All the incentives are set up to disadvantage students and put students with disabilities who struggle into an easy box called "alternate content expectations" and essential elementally, write them off. If ISDs are to be the front lines on enforcing equitable rights to an education for students with moderate to mild impairments, then we need a lot more help and action from the state, than merely passing the buck from the state. The tier 2 & 3 efforts this past year were a good place to start, but more support for the work and real, substantive training and a clear and timely guidance and direct involvement from the state is needed especially in districts with high rates and no interest in actually doing anything different than the status quo.

**Response 5:** Remove the Ed Benefit review- the data provided from [the MDE research consultant] was much more beneficial for our local districts than the requirement of the ed benefit. This tier 2 and 3 [high risk cases] data has been the most impactful for change as it identified additional flags for the district to dive into.

**Response 6:** included a group of 7 nearly identical responses submitted in a very similar timeframe, regarding issues typically encountered by ISD personnel: There was no formal roll-out for the Justification activities. Comment: Activities were robust but inconsistent. ISDs received different types of communication (catamaran, emails from MDE-OSE or emails from Assessment and Accountability, unclear how to send the information back), varied activities (some required ed benefit reviews, some data review, some “suggested” ed benefit review), & inconsistent information (Tier levels shared by MDE-OSE did not match Tier levels shared by MDE-BAA). Comment: It was unclear if the activities were suggestions OR requirements. Suggestion: include the incongruencies data from [the MDE Research Consultant] in Catamaran when the Justification Forms are released- One system with all the data at the same time Suggestion: Communicate activities with a clear, systematic approach that includes Deadlines and criteria Suggestion: Remove the Ed Benefit review- the data provided from [the MDE Research Consultant] was much more beneficial for our local districts than the requirement of the ed benefit. This tier 2 and 3 data has been the most impactful for change as it identified additional flags
for the district to dive into. Suggestion: clarify 1% for the center based programs
Suggestion: MDE provide guidance for a crosswalk of alternate curriculum, certificate
of completion, alternate assessment and appropriate curriculum resources to support
educators  Suggestion: Clarification document or FAQ- for additional support and to
debunk some myths EX: When there is a Change to Certificate of Completion
(instead of diploma) means the student moves to Mi-Access for assessment EX:
When you move a 3rd grader to alternate assessment, it has long-term impacts for a
student later (9th grade- diploma vs certificate of completion EX: When you make a
decision for M-Step or Mi-access, you are not predicting whether the student will be
proficient, just a determination for the team of what assessment would be most
appropriate based on the instruction the student is receiving Suggestion: Provide a
crosswalk of what is being assessed and how it is being assessed for regular state
assessment and alternate assessment to better support teams with the conversation
There is a huge jump between Regular State Assessment and the Mi-Access- has
MDE looked at this? Especially at the 11th grade level- SAT vs Mi-Access.

**Prompt #2**

The ESSA requires MDE to collect and submit justification for exceeding the 1.0
percent cap on alternate assessment. In 2023–24, justification forms will be collected
electronically using Catamaran. Catamaran is the electronic system used to complete
reporting and compliance tasks with MDE-OSE. Technical assistance was provided to
ISDs and member districts on how to submit data using Catamaran. Technical
assistance recommendations were made, and information shared between MDE and
ISDs using Catamaran. Justification forms from the previous year (2022-23) are
available for review online: [Information on Justification Forms](#).

Please provide comment on the use of Catamaran to meet justification requirements.

**Prompt #2 Comments:**

**Response 1**: Michigan's historical data shows they started applying for this waiver in
waiver in 2024. Michigan, I am sorry, but there is a reason the denial was not
approved by the US Department of Education. You have had five years to get this
number under 1% and didn't do it, yet are still applying again? What this tells the
people is that the activities listed in this form are NOT working. Something needs to
be done differently to help the state identify, prioritize, and make appropriate
adjustments to this process.

**Response 2**: Please see comments and suggestions in prompt 1. Additionally, it
would be helpful if ISDs could view district justification forms prior to district
submission in order to provide technical assistance on its completion. The
department’s universal TA on the form’s completion is simply not sufficient. Some are
very new to this process and have very specific questions that they need assistance
with. This is especially true with disproportionality. It would also be extremely helpful
if the department would make both the Alternate Assessment Rate Report AND the
Disproportionate Alternate Test Use Report available to ISDs before the district justification forms are released in Catamaran. It is helpful for the ISDs to analyze this data in advance to prepare TA. The ISD also needs time to share the dispro data with districts ahead of time in order for the district to complete the justification form. Finally, it would be helpful if the district specific MDE feedback was provided directly to the districts, within Catamaran.

**Response 3: from the Autism Alliance of Michigan:** COMMENT: The draft waiver requests states: “For the 2023–24 academic year, ISDs and LEAs are submitting justification forms as a task in Catamaran. Catamaran is the electronic system used to complete reporting and compliance tasks with MDE OSE. Both ISD and LEA forms are downloadable into accessible reports to be made available to members of the public, upon request.” This does not comply with the requirement in ESSA regulations, which clearly states that states must make LEA justifications publicly available. (34 C.F.R §200.6(c)(3)(iv))

**Response 4: included a group of 7 nearly identical responses within a very similar timeframe, regarding issues typically experienced by ISD personnel:** Build all activities (including those activities for Tier 2 and Tier 3 districts) and include all data (including the incongruencies data from [the MDE Research Consultant] in an Excel spreadsheet) as part of the Justification Form activity in Catamaran released in October or November. Perhaps follow the same structure as CAPs where districts have 45 days to complete the Justification Form and develop the Local Plan, then have 60 days (or a reasonable timeframe) to implement the plan and submit documentation in Catamaran of proof of implementation of activities. This would utilize the structure in Catamaran and the existing CAP structure and timeframes to have all activities and documentation, and data, all in one place that is easier to complete, easier to manage, easier to monitor, and would ensure consistent communication and understanding of deadlines and required activities. Suggestion: to ensure we are looking at the entire county for the percent of students taking alternate assessments, can you provide the data (as shared by [the MDE Research Consultant]) for all students taking alternate assessments so the data for students in a center-based program is also being reviewed and the county can look at the data big picture.

**Response 5:** Communicate activities with a clear, systematic approach that includes Deadlines and criteria. Build all activities (including those activities for Tier 2 and Tier 3 districts) and include all data (including the incongruencies data from [the MDE Research Consultant] in an Excel spreadsheet) as part of the Justification Form activity in Catamaran released in October or November. Perhaps follow the same structure as CAPs where districts have 45 days to complete the Justification Form and develop the Local Plan, then have 60 days (or a reasonable timeframe) to implement the plan and submit documentation in Catamaran of proof of implementation of activities. This would utilize the structure in Catamaran and the existing CAP structure and timeframes to have all activities and documentation, and data, all in one place that is easier to complete, easier to manage, easier to monitor,
and would ensure consistent communication and understanding of deadlines and required activities.

**Response 6:** This in theory sounds good, but in practice just becomes an exercise in paperwork and box checking. The kind of janky set up in Catamaran has gotten better over the year’s but we really need the data on flagged student cases far earlier in the year. And honestly, some of this whole process may be more effective if it were to happen on the front end, with test registration and administration and better systems set up for the IEP meetings themselves, to help normalize the collection and review of objective data and measures on the students cognitive and adaptive functioning; not just hunches, guess work, decade old-IQ tests from pre-school. In the absence of that, far too many districts and school administrators simply look at letter grades, say the student has an IEP, and lump them in the alternate bucket. Or they decide the student has some kind of cognitive impairment, lump them in a Mild CI program and then say, they only teach alternate standards in this program. Few students in mild CI programs should be taking alternate assessments and most need to be taught to higher standards--not simply written off for convenience of the district.

**Prompt #3**

For justification forms and monitoring and evaluation of the appropriate use of alternate assessments based on alternate content expectations, Michigan will be identifying districts with higher support needs using the alternate assessment rate data from the previous year’s testing cycle (Spring 2023).

Please provide comment on the use of previous year’s alternate assessment participation rates from Spring 2023 to identify districts who may be need more support in the appropriate use of alternate content expectations and assessments.

**Prompt #3 Comments:**

**Response 1:** I can speak to this [ISD] only but [our ISD] is most definitely giving the alternate assessment to students with low average or mild cognitive impairments. Many of the students on the alternate assessment docket do NOT have: Significant Intellectual Impairment, Significant Impairment to Adaptive Functioning, Extensive Support Needs with the majority of instruction and goals based on alternate content expectations for each tested subject. The training provided here has been slim to none, it all appears better in writing and there is no accountability for follow through. It’s a checkmark on the corrective action. Please send a neutral party to interview every single student who is supposedly deemed to having the severity of impairments listed above. You will find your data enlightening. It is the communities perception that the districts are trying to raise the test scores for the general population so the overall districts report card increases. And to do this, the lowest performing students need to be bumped out of the pool, which then raises the cap for alternate assessments to over 1% in which the state continues to obtain a waiver for. Let’s look at the bigger problem here. Under performing students in
general. Perhaps it is the teaching methodology we need to take a look at and now what students test where.

**Response 2:** Districts that operate center based regional programs are more likely to fall in Tier III. The ISD requests that the department uses their adjusted participation rate to place them in a tier. Or conversely, the ISD requests that the participation rates are sent back to the district of residence and reflected in their participation rate (much like the send scores back program). Otherwise, the department is assuming there are higher support needs in a district where it may not be needed.

**Response 3: from the Autism Alliance of Michigan** COMMENT: The use of a single year’s participation rate may not provide a full picture of the district’s need for support since the population of students with disabilities changes year-over-year. Michigan might consider using the most recent three consecutive years to identify districts in need of support to minimize impact of changes in student population.

**Response 4: included a group of 7 nearly identical responses from ISD staff submitted around the same time, but with different IP addresses:** Most districts do not know where to go to review this data. Looking at the historical trend data for participation in alternate assessment has been helpful. Please see suggestions from question 2- It was unclear what was required or recommended for additional support from MDE For small districts, this data is not always indicative if there need to be more support because the N-size is very small.

**Response 5:** This has been a decent strategy but the work is so hands off, late in the game, and so inconsequential, that little has changed for many of the districts who are the biggest offenders. More to the heart of the matter, to what extent are these districts culpable for failing to provide these students with an education? To what extent is the state culpable for enabling and allowing such practices to occur? To paraphrase Chief Justice Roberts: An IEP must be reasonable calibrated to help the student work toward meeting grade level expectations. To stand by and do nothing differently, to continue to hold low expectations for a student, and to simply pass the time until the students dropout (or certificate out, as the case for many may be), can hardly be called an education at all.

**Prompt #4**

MDE’s focus regarding participation in the alternate assessment (MI-Access) will continue to be to use a tiered support system to ISDs and districts.

- All Districts with alternate assessment rates exceeding 1.0 percent will complete justification forms and receive universal, general guidance on eligibility for alternate assessments. For districts with small student populations, where either fewer than five students taking alternate assessments set the district over 1.0 percent or where fewer than 300 students tested total, or for districts with alternate assessment rates between 1.1 and 1.3 percent and that have not disproportionately over-assigned
demographic subgroups of students to alternate assessments, the universal supports and guidance will be all the support the districts receive. Additionally, ISD-based center programs that focus more exclusively on programing for students with disabilities who have high support needs, will also receive standard, universal supports and guidance.

- Districts with sufficiently large N-sizes (either testing 300 or more students total, or testing 5 or more students using alternate assessments), alternate assessment rates between 1.4 percent to 2.6 percent or between 1.1 and 1.3 percent overall, but which have disproportionately over-designated some subgroup of students to take alternate assessments, will receive Tier 2 support. Tier 2 districts will be asked to review, with the ISD, the IEPs of students who have disability types, general education instruction levels, or alternate assessment performance statuses that may not be compatible with a designation as a student with the most significant disability, with the ISD.

- Districts with sufficiently large N-sizes and alternate assessment rates of 2.7 percent or higher, or which have both disproportionately over-assigned a demographic subgroup of students to alternate assessments and had overall alternate assessment rates greater than 1.3 percent, will receive Tier 3 support. The districts will be asked to review and submit directly to MDE for approval a written action plan using the provided Action Plan Template with timelines to address district level actions and review all flagged cases of students taking the alternate assessment. This plan must be approved by the ISD for students who have disability types, general education instruction levels, or alternate assessment performance statuses that may not be compatible with a designation as a student with the most significant cognitive disability.

- For targeted Tier 2 and Tier 3 districts, the flagged student cases will require prior verification from either the ISD (Tier 2 districts) or MDE (Tier 3 districts) of the appropriateness of alternate achievement standards for flagged students before justification forms will be approved.
  - Flagged student cases will require a review and confirmation that the students meet the requirements for use of alternate assessments. Requirements include that ALL appropriate diagnostic criteria are being used to determine that the student has the most significant cognitive disability, and that primary instruction in a subject is based on alternate content expectations. The criteria are:
    - Significant Intellectual Impairment, and
    - Significant Impairment to Adaptive Functioning, and
    - the student has Extensive Support Needs, and
    - the majority of instruction and summative educational goals are primarily based within the apex of alternate content expectations for each tested subject.
  Furthermore, these districts will need to conduct an educational benefit review for all students surpassing the Functional Independence level of alternate achievement expectations, based
on test performance on MI-Access, Functional Independence assessments and share the results for approval with the ISD.

- Additionally, Michigan will be incorporating warnings into the test registration secure site for cases where the student’s past test performance, general education instruction levels, and disability types are incongruent with the student having a significant cognitive disability and developing better data collection for districts to identify students with the most significant cognitive disability.

- Michigan will also continue to provide technical assistance needed for IEP teams to make decisions about the appropriate assessment for each and every student with a disability. Determining technical assistance needed for IEP teams to target instruction to each student's unique needs, encourage high expectations for all students, and understand expectations regarding the use of state content standards and/or alternate content expectations.

Please provide comment on MDE’s monitoring and evaluation plan, regarding the appropriate participation in and use of alternate assessments.

**Prompt #4 Comments:**

**Response 1:** This all sounds great but again if you are asking the district to make the determination on its success of these bullets, you will get very swayed and biased results. When you say the districts will be flagged and require a review, who will conduct this review? Because there are students here who have zero adaptive deficits, can drive small motor vehicles safely, are on the honor roll making progress towards general education standards and are still being forced into taking the MiAccess. This is a problem. Please do not count on the districts to report accurately.

**Response 2:** I see students who have been out of school due to family issues/trauma who can be streamlined into Alternative Assessments because they can qualify under this.

**Response 3:** See response to prompt 3. Regarding technical assistance from the department: updates to the Should My Student Take the Alternate Assessment should provide clarity on the concept of “most significant cognitive disability”. It is also encouraged that the department create an FAQ (or some other form of additional TA) to address common questions, such as “what do I do if student doesn’t meet criteria as having the MSCD but is unable to benefit from or demonstrate learning of the general content standards. This is not uncommon for a student to have a cognitive disability AND also have extensive support needs. Districts are in need of practical guidance and assistance on how to support this subset of students. Regarding the requirement to conduct an Ed Benefit Review for all students that took FI and surpassed, technical assistance is needed from the department on what this process and timeline will look like and how it suggests the requirement be carried out. This process is incredibly time consuming and will require resources that many districts do not have the capacity to conduct, particularly before the next test cycle.
begins. This requires training on how to conduct EBRs and the need for substitutes teachers (or PD days) to be able to implement. Will the department offer training or assistance in carrying this out?

Response 4: Autism Alliance of Michigan COMMENT: Given Michigan’s lack of progress in reducing the percentage of students assigned to its alternate assessment, the state might benefit by reviewing the work of other states that have made significant progress such as Ohio and Massachusetts.

Response 5: included a group of 7 nearly identical responses submitted within a similar timeframe regarding issues typically experience by ISD personnel: The use of summative assessments is to measure the effectiveness of the system and should be used to inform policy decisions. They are not designed to be used in the way we are using them to measure individual student performance. This fundamental misuse of this type of assessment creates additional barriers that impact our 1% data. Suggestion: How can MDE support districts (for IEP teams) in facilitating a clearer understanding of how GE peers participation and proficiency rates?

Response 6: We are glad to see that some of the clarifying points are being spelled out here regarding who really alternate assessments and alternate expectations are intended for and who really may need them; not just who it is convenient for districts to write off and have an easy out on, when it comes to educating and assessing students. Its just a shame that none of the state's universal trainings and official guidance materials really address any of this as of yet. It would be nice to see more trainings and clear messaging for all, not just conference presentations, and late in the game verification activities in Catamaran.

Additional comments regarding the waiver and/or justification form and approval process:

Response 1: Please stop applying for the waiver, tighten up your training for determining who meets qualified criteria, have a neutral party interview those students who supposedly meet all the criteria. Do not count on locals to accurately report. Ask the teachers to take a proficiency test after training. Obtain a list of all students who meet the eligibility criteria and ask for the evaluation results. Bottom line, there needs to be more hands on supervision in this area and the states needs to change the larger process that deals with the bigger issue of educational rather than waive the amount of kids who should fall into this alternative testing pool. Please do deeper research into why rather than finding alternative solutions. Further, there is a bigger problem here at [our regional district]. If you look at the latest reporting for Mi-Access, ZERO percent of 8th graders scored proficient in the math or ELA portion of the alternate assessment. These teachers need to be closely evaluated. Part of the problem is that they are using the Unique Learning System curriculum which does NOT meet the ESSA guidelines for evidenced based interventions. Why isn't the Dept of Education at the state and federal government holding districts accountable for using what IDEA defines as sound research based
interventions with our students? Why does it take a community to recognize this and not the agencies who are supposed to be monitoring this.

**Response 2:** There needs to be better education and accountability for districts that classify kids for Mi-Access to create false high test scores (exclude the lower test scores). Students who have been out of school due to family issues/trauma can be streamlined into alternative assessments.

**Response 3:** I am a parent of an 11 year old student who, after 3 years of not being provided with FAPE was moved to the alternative assessment. Michigan cannot keep requesting a waiver, yet fail to make progress toward the 1% goal. It seems that students moved to the alternative assessment are discarded and not worth the effort and resources it takes to educate them. Of course they will fall behind when they are not educated and no oversight is provided to ensure that they are not only educated moving forward, but adequate remediation is also put in place to correct the harm done. I do not support the renewal of the waiver allowing Michigan to continue to exceed the %1 cap.

**Response 4:** Included a group of 7 nearly identical responses from ISD staff submitted around the same time, but with different IP addresses: In considering the above suggestions/feedback, PLEASE collaborate more with the statewide Monitor group for ongoing feedback and continuous improvement efforts in working toward a more effective and efficient system to monitor and evaluate the usage of alternate assessments Thank you for continuing to advocate for IEP teams to determine the type of assessment the student will take so it can truly be an individualized decision based on data and guidance.

**MDE Response to Public Comment:**

Michigan has made progress since 2017 at reducing its overall alternate assessment rate. However, over the last two years the alternate assessment rate has not changed. MDE is exploring different strategies and best practices used by other states who have been effective at reducing rates of alternate assessments. Some of the strategies are listed below in response to related public comment, other strategies are described in the Waiver Requirements section beginning on page 16.

MDE appreciates individuals, groups, and advocacy organizations for taking the time to provide feedback. All public comment will be considered. Based on some common threads from comments received, MDE added the following observations and clarifications.

1. The department is improving its monitoring and evaluation system and revising technical assistance/guidance and assessment decision-making documents to further clarify assessment criteria. For example, a revised decision-making flow chart will be provided to the field to more clearly specify how IEP teams determine assessment participation for students with disabilities.
a. Over the next few months, MDE will seek input from special education professional organizations (such as Special Education Instructional Leadership Network, Michigan Association of Administrators of Special Education, Special Education Advisory Panel, Michigan Alliance for Families, and others) regarding district policies and procedures on Least Restrictive Environment (LRE) placement decisions, paying particular attention to demographic subgroup data. The outcome of this input, and LRE monitoring activities planned for 2024 will determine the collaboration with the general education professional organizations (including Michigan Elementary and Middle School Principal Association, Michigan Association of Secondary School Principals and Michigan Association of School Administrators) to clarify LRE requirements and its impact on student participation in statewide assessments.

b. MDE will expand district involvement in the MDE IEP Bootcamp professional development (conferences, ISDs and districts, professional organizations) that explores the procedural and substantive aspects of writing IEPs that are both compliant with the law and meaningful to individual students with disabilities. Districts learn the requirements of writing an IEP, assembling an IEP team, and supporting students with a plan tailored to their individual needs. The professional development also addresses the procedures IEP teams follow when making assessment decisions.

c. MDE will explore policy changes to potentially reduce the responsibilities IEP teams have in state assessment decision making such as narrowing the standard deviation range for consideration of assessment options.

2. In response to comments about ISDs receiving flagged student data too late for the data to be useful, data for Tier 2 and Tier 3 activities was released sooner, in a more consistent manner, and in a format that more closely aligns to how ISD will be reporting back to MDE. Catamaran, the data platform, is being enhanced to make the process easier and data more readily available to ISDs. MDE is exploring better ways to share flagged student data at the district level. Additionally, flags and warnings in the test registration platform will inform district administrators and educators regarding the necessary eligibility criteria, and inclusion and exclusion criteria for determining a student has the most significant cognitive disability and meets all other eligibility requirements for alternate assessments.

MDE will ensure consistency of assessment determination messaging across MDE platforms and that information is more readily available to ISD representatives and stakeholders.

3. Regarding increased district accountability, MDE will notify the 47 districts who have had the highest alternate assessment rates over the past 3 years and offer assistance to review practices for assigning students to alternate
assessment. MDE will support districts in understanding their subgroup participation rates, particularly for students in subgroups with elevated risk or significant disproportionate risk for taking an alternate assessment.

4. The Autism Alliance of Michigan provided several suggestions for the department to consider for improving public sharing of the alternate assessment participation rate data. MDE has, and will continue to present, the data at conferences and make the results available to the general public on the MDE website. MDE will continue monitoring activities promoting greater accountability for district decision making.

5. MDE recognizes the legitimate need for alternate assessment for students with the most significant cognitive disabilities. MDE will continue to provide a valid and reliable assessment to meet the needs of these truly eligible students. There continues to be evidence to suggest that not all students who currently participate in the alternate assessment were appropriately determined as eligible for participation. The actions specified throughout this response will support change in alternate assessment participation rates.

6. In response to related public comments, MDE publicly posts all justification forms, organized by ISD, on the MDE website at: 2023 ISD One Percent Cap Justification Summaries. In response to the aforementioned comment, there is no requirements for local districts or ISDs to post the forms on their website. MDE will continue to post all received justification forms on its website, thus making the data publicly available.

7. MDE will seek opportunities to share comments and issues with stakeholder groups such as Autism Alliance of Michigan, and Michigan Association of School Psychologists as well as others. MDE will explore forming an alternate assessment advisory group to develop and coordinate guidance on appropriate statewide assessment decision making.

Waiver Requirements

ESSA stipulates several requirements for the waiver to exceed the 1.0 percent cap. MDE’s response to each requirement is found below. Please note the data provided is information from the most recent state assessment testing window.

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 April 8, 2024. Specifically, the seven-week testing window for MI-Access (the state summative AA-AAAS) is from April 8, 2024 through May 24, 2024. The waiver request is being made 90 days prior to this 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.

As shown in Tables 1 through 3 below, similar to the 2022 participation rates, the actual rate of alternate assessment for Spring 2023 was 1.8%. For Science, Mathematics, and ELA, the rate climbed by one tenth to 1.9%.

Table 1: 2022-23 English Language Arts (Grades 3-8 and 11) Participation in Alternate Assessment, MI-Access

<table>
<thead>
<tr>
<th>Demographic Sub-group</th>
<th>Number of Students Tested Using an Alternate Assessment</th>
<th>Total Number of Students Tested</th>
<th>Percent of Students Tested Using an Alternate Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Students</td>
<td>13,082</td>
<td>702,914</td>
<td>1.9%</td>
</tr>
<tr>
<td>Male</td>
<td>8,723</td>
<td>359,456</td>
<td>2.4%</td>
</tr>
<tr>
<td>Female</td>
<td>4,359</td>
<td>343,458</td>
<td>1.3%</td>
</tr>
<tr>
<td>English Learner</td>
<td>775</td>
<td>47,942</td>
<td>1.6%</td>
</tr>
<tr>
<td>Economically Disadvantaged</td>
<td>9,124</td>
<td>382,444</td>
<td>2.4%</td>
</tr>
<tr>
<td>Native American</td>
<td>84</td>
<td>3,938</td>
<td>2.1%</td>
</tr>
<tr>
<td>Asian</td>
<td>335</td>
<td>25,709</td>
<td>1.3%</td>
</tr>
<tr>
<td>African American</td>
<td>3,551</td>
<td>124,859</td>
<td>2.8%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,065</td>
<td>61,897</td>
<td>1.7%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>84</td>
<td>3,956</td>
<td>2.0%</td>
</tr>
<tr>
<td>White</td>
<td>7,405</td>
<td>449,934</td>
<td>1.6%</td>
</tr>
<tr>
<td>Multi-Racial</td>
<td>623</td>
<td>35,982</td>
<td>1.7%</td>
</tr>
</tbody>
</table>

Table 2: 2022-23 Mathematics (Grades 3-8 and 11) Participation in Alternate Assessment, MI-Access

<table>
<thead>
<tr>
<th>Demographic Sub-group</th>
<th>Number of Students Tested Using an Alternate Assessment</th>
<th>Total Number of Students Tested</th>
<th>Percent of Students Tested Using an Alternate Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Students</td>
<td>12,887</td>
<td>704,158</td>
<td>1.8%</td>
</tr>
<tr>
<td>Male</td>
<td>8,584</td>
<td>360,088</td>
<td>2.4%</td>
</tr>
<tr>
<td>Female</td>
<td>4,303</td>
<td>344,070</td>
<td>1.3%</td>
</tr>
<tr>
<td>English Learner</td>
<td>772</td>
<td>49,527</td>
<td>1.6%</td>
</tr>
<tr>
<td>Economically Disadvantaged</td>
<td>8,987</td>
<td>383,008</td>
<td>2.3%</td>
</tr>
<tr>
<td>Native American</td>
<td>81</td>
<td>3,956</td>
<td>2.0%</td>
</tr>
<tr>
<td>Asian</td>
<td>329</td>
<td>26,119</td>
<td>1.3%</td>
</tr>
<tr>
<td>African American</td>
<td>3,495</td>
<td>124,820</td>
<td>2.8%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,058</td>
<td>62,499</td>
<td>1.7%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>595</td>
<td>595</td>
<td>1.0%</td>
</tr>
<tr>
<td>White</td>
<td>7,292</td>
<td>450,221</td>
<td>1.6%</td>
</tr>
<tr>
<td>Demographic Sub-group</td>
<td>Number of Students Tested Using an Alternate Assessment</td>
<td>Total Number of Students Tested</td>
<td>Percent of Students Tested Using an Alternate Assessment</td>
</tr>
<tr>
<td>------------------------</td>
<td>--------------------------------------------------------</td>
<td>--------------------------------</td>
<td>----------------------------------------------------------</td>
</tr>
<tr>
<td>Multi-Racial</td>
<td>613</td>
<td>35,948</td>
<td>1.7%</td>
</tr>
</tbody>
</table>

Table 3: 2022-23 **Science (Grades 5, 7, 8 and 11)** Participation in Alternate Assessment, MI-Access

<table>
<thead>
<tr>
<th>Demographic Sub-group</th>
<th>Number of Students Tested Using an Alternate Assessment</th>
<th>Total Number of Students Tested</th>
<th>Percent of Students Tested Using an Alternate Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Students</td>
<td>5,482</td>
<td>301,127</td>
<td>1.8%</td>
</tr>
<tr>
<td>Male</td>
<td>3,667</td>
<td>153,749</td>
<td>2.4%</td>
</tr>
<tr>
<td>Female</td>
<td>1,815</td>
<td>147,378</td>
<td>1.2%</td>
</tr>
<tr>
<td>English Learner</td>
<td>303</td>
<td>18,742</td>
<td>1.6%</td>
</tr>
<tr>
<td>Economically Disadvantaged</td>
<td>3,729</td>
<td>155,516</td>
<td>2.4%</td>
</tr>
<tr>
<td>Native American</td>
<td></td>
<td>1,693</td>
<td></td>
</tr>
<tr>
<td>Asian</td>
<td>125</td>
<td>11,322</td>
<td>1.1%</td>
</tr>
<tr>
<td>African American</td>
<td>1,478</td>
<td>51,378</td>
<td>2.9%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>423</td>
<td>26,311</td>
<td>1.6%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td></td>
<td>259</td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>3,168</td>
<td>195,857</td>
<td>1.6%</td>
</tr>
<tr>
<td>Multi-Racial</td>
<td>239</td>
<td>14,307</td>
<td>1.7%</td>
</tr>
</tbody>
</table>

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.**

Due to ongoing absences and instability in enrollments during the COVID-19 pandemic, Michigan had fewer students enrolled and tested in Spring 2022 than anticipated (approximately 25,000 fewer). For the Spring 2023, the student enrollment and testing counts were much more in line with expected long-term demographic trends. Overall, Michigan had more than 95 percent of all students participate in statewide summative assessments for all subjects, and roughly 95 percent or more of students with disabilities participate in ELA and Mathematics in the Spring of 2023; however, for Science, the participation rate among students with disabilities only reached 92.7% (see Tables 4 through 6 below). MDE OSE has created a parent friendly webinar regarding the importance of all students participating in statewide summative assessments.

Table 4: 2022–23 **English Language Arts (Grade 3-8 and 11)** Participation in State Summative Assessment (M-STEP, MME, MI-Access), Overall and for Students with Disabilities by Content Area
Table 5: 2022-23 **Mathematics (Grades 3-8 and 11)** Participation in State Summative Assessment (M-STEP, MME, MI-Access), Overall and for Students with Disabilities

<table>
<thead>
<tr>
<th>Demographic Sub-group</th>
<th>Number of Students with Valid Tests</th>
<th>Number of Students Expected to Test</th>
<th>Percent of Students Participating in State Tests</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Students</td>
<td>702,914</td>
<td>723,061*</td>
<td>97.2%</td>
</tr>
<tr>
<td>Students with Disabilities</td>
<td>96,682</td>
<td>100,850</td>
<td>95.9%</td>
</tr>
</tbody>
</table>

Table 6: 2022-23 **Science (Grades 5, 8, and 11)** Participation in State Summative Assessment (M-STEP, MME, MI-Access), Overall and for Students with Disabilities

<table>
<thead>
<tr>
<th>Demographic Sub-group</th>
<th>Number of Students with Valid Tests</th>
<th>Number of Students Expected to Test</th>
<th>Percent of Students Participating in State Tests</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Students</td>
<td>704,158</td>
<td>723,061*</td>
<td>98.3%</td>
</tr>
<tr>
<td>Students with Disabilities</td>
<td>96,451</td>
<td>100,850</td>
<td>95.6%</td>
</tr>
</tbody>
</table>

*Note: Number of students expected is based on public enrollment counts in tested grades during the Fall 2023 student counts and data collection window. EDFacts tables with enrollments based on a combination of Fall enrollment and unique enrollment updates at the time of test registration, and include other accountability and Federal reporting criteria, were not yet available in time for the waiver. The two count windows generally provide similar counts and participation rates.

**Requirement 3 (A):**

**Provide assurance that districts over 1.0 percent participation in the alternate assessment followed the state’s participation guidelines.**

For the 2023–24 academic year, MDE will continue to use justification forms as the mechanism to collect individual LEA and ISD responses and justifications for exceeding the 1.0 percent cap. Justification forms are also the mechanism for LEAs and ISDs to provide updates on prospective rates during the upcoming testing period and for submitting plans for continuous improvement in preparing IEP teams to determine appropriate assessment selection for students with disabilities by following the state’s participation guidelines and federal requirements. MDE will also continue to develop and provide technical assistance through guidance, trainings, and other resources, specific to alternate assessment selection.
Many LEAs have provided training to staff regarding the state guidelines for participation in the alternate assessment. Areas MDE is specifically focusing on for more timely and targeted guidance are:

- warnings in the test registration system for students with disability types and other student data that are not congruent with either the student having the most significant cognitive disabilities or receiving a majority of instruction based on alternate content expectations;
- flagging high-risk cases for ISDs to review with districts with high rates of alternate assessment use;
- clarifying each of the required criteria needed for a student to meet the definition of a student with the most significant cognitive disabilities and an emphasis on using sound, valid, and reliable criterion-relevant indicators for each aspect of the definition of a student with the most significant cognitive disabilities;
- clarifying the requirements around the primary instruction and educational goals being based on alternate content expectations;
- having districts with high rates of alternate assessment develop parent information and consent forms to use in the IEP process to ensure that parents and all IEP team members know and understand the required criteria to be eligible for alternate assessments and to discuss the strong association between the use of alternate content expectations aligned to educational goals and the potential impact on the student’s ability to earn credits toward a high school diploma further down the educational stream.

**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 alternate assessment (MI-Access) based on the most recently completed test cycle (Spring 2023) for statewide summative assessments. Disproportionality was examined for the following demographics:

1. **Gender**
   a. Male
   b. Female
2. **Economic Disadvantage** (based on poverty risk factors such as free/reduced lunch eligibility, homelessness, migrant status, and direct certification for government food assistance)
   a. Disadvantaged
   b. Not Disadvantaged
3. **Racial/Ethnic Groups**
   a. Native American
   b. Asian
   c. African American or Black
To determine whether substantive disproportionality affected any subgroups of students, Michigan used a relative risk ratio method to analyze the rate of participation in alternate assessments. For other federal reporting (e.g., 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 alternate assessment 2.5 times more often than students who are not in the same demographic. A relative risk ratio of 1.0 means students in one demographic participate in the alternate assessment at the same rate as students who are not in the same demographic.

As depicted in Tables 4 through 6, Michigan did identify one group (Pacific Islanders) in the subject of science who were tested using alternate assessments at a significantly disproportionate rate (i.e., with a relative risk of 2.5 or more) statewide. However, in the other subjects, the risk ratio for this group was much lower and varied widely. It is likely that the small N-size of this particular sub-group (12 students in science), is driving a spurious finding and that the disproportionality for this group is not a robust finding. Three of the students were educated within the same district, the other 9 were single cases, each in a unique district. Generally, the sub-group of students with the highest relative risk ratio across all subjects (economically disadvantaged students), had a relative risk of 1.9 in both ELA and Math, and the risk of disproportionately being tested with alternate assessments for this group has decreased since Michigan applied for the first waiver. In 2021, it dropped below the elevated risk threshold of 2.0 for the first time and remained at or below that threshold in 2022 and 2023.

Table 7: SY 2022-23 for English Language Arts, Simple Groups Disproportionate Alternate Assessment Participation by Demography

<table>
<thead>
<tr>
<th>Simple Groups</th>
<th>Group Rate Comparison (In-group vs. not)</th>
<th>Risk Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender (Male vs Female)</td>
<td>2.4% vs. 1.3%</td>
<td>1.85</td>
</tr>
<tr>
<td>Economic Disadvantage</td>
<td>2.4% vs. 1.2%</td>
<td>2.00*</td>
</tr>
<tr>
<td>English Language Learner</td>
<td>1.6% vs. 1.9%</td>
<td>0.84</td>
</tr>
</tbody>
</table>

*Note: Risk ratios between 2.0 and 2.4 are considered elevated risk, and risk ratios ≥ 2.5 are considered disproportionately high representation among students taking the alternate assessment.
Table 8: SY 2022-23 for **English Language Arts**, Multi-Groups Disproportionate Alternate Assessment Participation by Demography

<table>
<thead>
<tr>
<th>Multi-Groups: Race/Ethnicity</th>
<th>Group Rate Comparison (In-group vs not)</th>
<th>Risk Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Native American</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian</td>
<td>1.3% vs. 1.9%</td>
<td>0.68</td>
</tr>
<tr>
<td>African American</td>
<td>2.8% vs. 1.6%</td>
<td>1.75</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1.7% vs. 1.9%</td>
<td>0.89</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>1.6% vs. 2.2%</td>
<td>0.73</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1.7% vs. 1.9%</td>
<td>0.89</td>
</tr>
</tbody>
</table>

*Note:* Risk ratios between 2.0 and 2.4 are considered elevated risk, and risk ratios $> 2.5$ are considered disproportionately high representation among students taking the alternate assessment.

Table 9: SY 2022-23 for **Mathematics**, Simple Groups Disproportionate Alternate Assessment Participation by Demography

<table>
<thead>
<tr>
<th>Simple Groups</th>
<th>Group Rate Comparison (In-group vs not)</th>
<th>Risk Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender (Male vs Female)</td>
<td>2.3% vs. 1.3%</td>
<td>1.77</td>
</tr>
<tr>
<td>Economic Disadvantage</td>
<td>2.3% vs. 1.2%</td>
<td>1.92</td>
</tr>
<tr>
<td>English Language Learner</td>
<td>1.6% vs. 1.9%</td>
<td>0.84</td>
</tr>
</tbody>
</table>

*Note:* Risk ratios between 2.0 and 2.4 are considered elevated risk, and risk ratios $> 2.5$ are considered disproportionately high representation among students taking the alternate assessment.

Table 10: SY 2022-23 for **Mathematics**, Multi-Groups Disproportionate Alternate Assessment Participation by Demography

<table>
<thead>
<tr>
<th>Multi-Groups: Race/Ethnicity</th>
<th>Group Rate Comparison (In-group vs not)</th>
<th>Risk Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Native American</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian</td>
<td>1.3% vs. 1.9%</td>
<td>0.68</td>
</tr>
<tr>
<td>African American</td>
<td>2.8% vs. 1.6%</td>
<td>1.75</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1.7% vs. 1.8%</td>
<td>0.94</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>1.6% vs. 2.2%</td>
<td>0.73</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1.7% vs. 1.8%</td>
<td>0.94</td>
</tr>
</tbody>
</table>

*Note:* Risk ratios between 2.0 and 2.4 are considered elevated risk, and risk ratios $> 2.5$ are considered disproportionately high representation among students taking the alternate assessment.

Table 11: SY 2022-23 for **Science**, Simple Groups Disproportionate Alternate Assessment Participation by Demography

<table>
<thead>
<tr>
<th>Simple Groups</th>
<th>Group Rate Comparison</th>
<th>Risk Ratio</th>
</tr>
</thead>
</table>
Table 12: SY 2022-23 for Science, Simple Multi-Groups Disproportionate Alternate Assessment Participation by Demography

<table>
<thead>
<tr>
<th>Multi-Groups: Race/Ethnicity</th>
<th>Group Rate Comparison (In-group vs not)</th>
<th>Risk Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Native American</td>
<td>1.1% vs. 1.8%</td>
<td>0.61</td>
</tr>
<tr>
<td>Asian</td>
<td>2.9% vs. 1.6%</td>
<td>1.81</td>
</tr>
<tr>
<td>African American</td>
<td>1.6% vs. 1.8%</td>
<td>0.89</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1.6% vs. 1.8%</td>
<td>0.73</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>1.7% vs. 1.8%</td>
<td>0.94</td>
</tr>
<tr>
<td>White</td>
<td>1.6% vs. 2.2%</td>
<td></td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1.7% vs. 1.8%</td>
<td></td>
</tr>
</tbody>
</table>

*Note: Risk ratios between 2.0 and 2.4 are considered elevated risk, and risk ratios > 2.5 are considered disproportionately high representation among students taking the alternate assessment.

Additionally, for each LEA, Michigan examined the Spring 2023 data as well as the two most recent years of alternate assessment administrations for participation in mathematics and ELA. Districts that tested the same sub-group of students at 2.5 times more often than students who were not in that sub-group, for two or more years, were flagged for more targeted supports and review, as part of the justification form and review process. In all, there were 30 districts with disproportionate use of alternate assessments. Findings have been shared with ISDs and districts as part of targeted guidance, and ISD staff will be trained to identify and target districts with substantively high disproportionate use of alternate assessments. For districts to be included in the disproportionality analyses and identification process, two minimum N-sizes were employed for each year of data:

1. Districts with 30 or more total students tested using the alternate assessment were examined for over-assignment.
2. Districts with at least 10 students from any demographic subgroup tested using the alternate assessment were evaluated for over-assignment of that subgroup.

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 disabilities" in future academic years.
Each ISD has implemented monitoring procedures and evaluation methods, in part developed by the department, and in part informed by best practices in other states, to ensure the standards and criteria related to assessment selection are being achieved by the ISD and the constituent districts.

In addition, MDE established a three-tiered system to provide additional oversight and support to LEAs that assess more than 1.0 percent of students using the alternate assessment. This tiered system originated as part of the plan implemented in 2018-19 and will continue in 2022-23 with the following updated criteria, to further reduce the alternate assessment rates and in response to USED’s increased emphasis on verification of alternate assessment appropriateness.

- All districts with alternate assessment rates exceeding 1.0 percent will complete justification forms and receive universal, general guidance on inclusion criteria for alternate achievement standards in assessment and instruction. For districts with small student populations where fewer than five students taking alternate assessments set them over 1.0 percent, or for districts with alternate assessment rates between 1.1 and 1.3 percent and that have not disproportionately over-assigned demographic subgroups of students to alternate assessments, the universal supports and guidance will be the primary form of support provided.

- Districts with either alternate assessment rates between 1.4 percent to 2.6 percent or between 1.1 and 1.3 percent overall—but who also have disproportionately over-designated some sub-group of students to take alternate assessments—will receive Tier 2 support. This Tier 2 threshold was reduced from 1.6% last year to 1.4% for Spring 2024. These districts will be asked to review, with the ISD, the IEPs of students who have disability types, general educational instruction levels, or alternate assessment performance statuses that may not be compatible with a designation as a student with the most significant cognitive disability.
  - Flagged student cases will require a review and confirmation that appropriate, evidence-based diagnostic criteria are in use for determining that the student meets all criteria for having the most significant cognitive disability (substantial intellectual impairment, substantial impairment in adaptive functioning, and extensive support needs) and that the student is also receiving a majority of instruction and summative curriculum based on alternate content expectations.
  - Furthermore, these districts will have to conduct an educational benefit review for all students surpassing the Functional Independence level of alternate achievement expectations, based on test performance on MI-Access, Functional Independence assessments and share the results for approval with the ISD.
  - Lastly, for districts in this Tier, a standard parent information and consent form about the use of alternate standards and assessments will need to be developed and used in future IEP planning meetings.
Districts with either alternate assessment rates of 2.7 percent or higher, or who have both disproportionately over assigned a demographic subgroup of students to alternate assessments and had overall alternate assessment rates greater than 1.4 percent, will receive Tier 3 support. These districts will be asked to review, with the ISD, the IEPs of students who have disability types, general educational instruction levels, or alternate assessment performance statuses that may not be compatible with a designation as a student with the most significant disability.

- The ISD and district must create and submit a written action plan using the provided Action Plan Template with timelines to address district level actions and review all flagged cases of students taking the alternate assessment. This plan must be approved by the ISD.
- Lastly, for districts in this Tier, a standard parent information and consent form about the use of alternate content expectations and assessments will need to be developed and used in future IEP planning meetings.

Additionally, Michigan will continue to provide technical assistance for IEP teams to make decisions about the appropriate assessment for each and every student with a disability and technical assistance for IEP teams to target instruction to each student's unique needs, encourage high expectations for all students, and understand expectations regarding the use of state content standards and/or alternate content expectations. For instance, Michigan will add warnings into the test registration process this year for cases where the student's past performance, general educational instruction levels, or disability type are incongruent with the student having a significant cognitive impairment.

Over the past year, Michigan has provided the following support and guidance:

- Tier I, provided for all LEAs:
  - Communications regarding the training available online.
  - A technical assistance call with the focus on the importance of student participation in assessments.
  - In-person training on assessment selection, as requested by ISDs or LEAs and provided the following trainings to stakeholder groups in the past year):
    - Michigan Council for Exceptional Children (MCEC) Supervisors of Low Incidence Programs Conference
    - Michigan Association for Administrators of Special Education (MAASE) Summer Institute
    - MAASE Community of Practice
  - Resources that are and will be further developed by MDE, ISDs, or LEAs for others to access and use (such as on each aspect of the definition of a student with the most significant cognitive disability and decision
guides for identifying which students have primary instruction and summative educational goals based on alternate content expectations).

- Guidance provided to last year to ISDs regarding Tier II and III districts whose alternate participation rates were 1.6 percent or higher or whose data indicated issues of disproportionality in state testing for students with disabilities.
  - As part of the justification forms, ISDs developed and updated plans for supporting each LEA who met the criteria for Tier II support. ISDs were also encouraged to provide technical assistance or training to school staff regarding the definition of Students with the Most Significant Cognitive Disability (SMSCD), if the district’s justification form indicated the definition of eligibility for alternate achievement standards was misunderstood or misapplied.
  - ISDs provided a list of LEAs that require support and a plan for that support and further training.
  - Furthermore, ISDs were asked to encourage Tier II districts to review the performance of students surpassing the Functional Independence level of alternate assessments and to consider the educational benefit of the current alternate achievement expectations to which the student is being taught.
  - Tier III, last year, for LEAs where alternate participation rates were in the top 3.0 percent of districts or where the participation rate was 1.6 or higher and where data indicated issues of disproportionality in state testing for students with disabilities. The ISD and/or MDE personnel developed individual plans for support for the LEAs falling into Tier III. Furthermore, ISDs were asked to have Tier III districts review the performance of students surpassing the Functional Independence level of alternate assessments and to consider the educational benefit of the current alternate achievement standards to which the student is being taught and to review those findings with the ISD.

MDE created a formal definition of SMSCD during the 2019-20 academic year. The definition was shared in draft form for feedback during Tier I and Tier III events, ISD special education director’s meetings, OSE data advisory committee meetings, and regional ISD monitor meetings. The definition was also included in the public comment request completed for the request to renew the waiver to exceed the 1.0 percent cap. The definition is now embedded in MDE’s assessment selection flow chart, online assessment selection guidelines training, and the IEP interactive decision-making tool. The definition is:

Students with the most significant cognitive disabilities, for the purpose of determining instructional targets and state assessment selection, have a disability or multiple disabilities that significantly impact intellectual functioning.
Significantly impact adaptive behaviors, which are essential to live independently and to function safely in daily life. When adaptive behaviors are significantly impacted, the individual is unlikely to develop the skills necessary to live independently and function safely in daily life.

and

Significant cognitive disabilities impact students both in and out of the classroom and across multiple life domains, including academic domains. This means that the students have extensive support needs to demonstrate learning and generalize skills across academic and life settings.

and

Students with the most significant cognitive disabilities are supported with an Individualized Education Program (IEP) and the primary instruction and summative educational goals are based on Michigan’s alternate content expectations in English language arts (ELA), mathematics, science and/or social studies.

Special Note: MI-Access is not designed for most students whose primary disability is a specific learning disability, speech language impairment, emotional impairment, or other health impairment. Furthermore, MI-Access should not be the default assessment of choice for students with hearing, visual, or physical impairments. Students with these disabilities must also demonstrate clear evidence (either clinical or educational or both) of significant cognitive disabilities in order for alternate achievement standards to be appropriate.

MDE has not received any new feedback regarding the need to revise the definition of SMSCD since the initial feedback following the 2019 waiver approval. The establishment of the definition facilitated the appropriate assessment selection and reducing of the number of students taking the alternate assessment to 1.9 percent. Furthermore, when a district’s justification form indicated the definition of eligibility for alternate achievement standards was misunderstood or misapplied, ISDs were also encouraged to provide technical assistance or training to school staff regarding the definition of SMSCD. MDE will continue to use the definition established in 2019-20 for the 2023-24 academic year but will focus on ensuring ISDs and districts understand students must meet ALL components of the definition in order to be eligible to take MI-Access.

MDE will continue to post the ISD justification summaries submitted for the 2023-24 academic year, which will include individual plans for ensuring appropriate assessment selection, from each year.
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.

MDE uses a tiered system of support to sort LEAs for the purpose of providing oversight and technical assistance. The cut scores for inclusion in Tier II and Tier III have been reduced from 1.6 percent to 1.4 percent to reflect continuous improvement efforts.

For the 2023–24 academic year, ISDs and LEAs are submitting justification forms as a task in Catamaran. Catamaran is the electronic system used to complete reporting and compliance tasks with MDE OSE. Both ISD and LEA forms are downloadable into accessible reports to be made available to members of the public, upon request.

MDE has recorded webinar workshops that provide technical assistance to LEAs and ISDs. MDE continues to have direct input to the ISDs regarding LEAs meeting the requirements for Tier II and Tier III support.

Based on interactions with ISD and LEA personnel, MDE believes LEAs may need additional support for IEP teams to properly target instruction for students with disabilities, particularly for students who fall outside of the definition of students with the most significant cognitive disabilities. MDE plans to have LEAs conduct educational benefit reviews for students performing highly on alternate assessments, especially if the LEAs are in Tier II or III. Michigan also plans to provide ISDs and LEAs with data on flagged student cases from Spring 2023, where the student’s disability type, high level of general education instruction, or past surpassing performance on alternate assessments are incongruent with the student having a significant cognitive impairment, so that the ISD or LEA may better evaluate and monitor, whether or not alternate instruction is appropriately assigned.

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.

In the subject of Science, disproportionality was found at the state level for Pacific Islanders being over-assigned to alternate content expectations. However, due to the small N-size of this group, and the contradictory risk ratios found for the group in the other subjects, Michigan believes that this finding is spurious. Nevertheless, Michigan will reach out to the district that tested more than one Pacific Islander student to inquire further. Additionally, at the district level, thirty districts within the state were identified as disproportionately over-assigning some sub-group of students to alternate assessments, based on high-risk ratios for two testing cycles in a row. As part of the justification form approval process, ISDs are expected to facilitate
conversations with the affected LEAs on the disproportionality list. In addition, any LEA assessing 1.3 percent or more of all students using the alternate assessment and flagged for disproportionality qualifies for Tier III status and must include a plan to address disproportionality in the justification forms submitted to the ISD.

**Requirement 5:**

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

Michigan made substantial progress toward meeting the 1.0 percent cap requirement under past years of the waiver. This is evidenced by the reduction in students taking the alternate assessment from a high of 2.4 percent in Spring 2017 to a projected rate of 1.9 percent in Spring of 2021 (if overall participation rates had been normal), and 1.8 percent in Spring 2022. In all, from 2017 to 2022, Michigan has reduced the total number of students participating in alternate assessments by 6,028 students, down from a high of over 18,830 in 2017 to 12,802 in 2022. For the students who have transitioned from alternate achievement expectations to the general grade level standards, the odds in real-terms of graduating high school with a diploma has increased by roughly 22 percent and in relative terms has roughly doubled, and the real-term odds of going on to enroll in college within two years of leaving high school has increased by roughly 10 percent. Additionally, from an equity perspective, the risk ratio for subgroups has improved across the assessment cycles, from 2017 to 2021, with disparity in alternate assessment use for economically disadvantaged students reaching its lowest point in 2021 and maintaining in 2022 and 2023.

In addition, MDE has expanded the plans for improvement by:

- Lowering the criteria in the three-tier system of support as outlined in Requirement 4A.
- Monitoring and enforcing compliance on only assigning alternate achievement expectations for SMSCD.
- Increasing LEA access to data needed for justifications.
- Increasing the verification of the appropriateness, necessity, and benefit of alternate achievement standards for students whose performance, primary disability type, or general education instructional practices seem incongruous to the definition of a student with the most significant cognitive disabilities.
- Requiring the development and use of parent information and consent forms for the use of alternate assessments.
- Enhancing MDE’s focus to include a collaborative process for developing IEP team guidance for properly targeting instruction, as well as assessment selection, for students with disabilities.
MDE is confident the plan outlined in this waiver request, once implemented, will result in renewed reductions in the percentage and number of students taking the alternate assessment in the state of Michigan.

Sincerely,

Michael F. Rice, Ph.D.
State Superintendent

Attachments regarding this year’s public comment notice:

Public Comment Notice Memo 2023 – 123: Alternate Assessment One Percent Cap Waiver Request, November 15, 2023

Spotlight on Student Assessment and Accessibility, November 16, 2023
Thank you, Jerry. We appreciate the explanation.

We will move forward with the data from the EDFacts tables and will let you know if we have any further questions.

Thanks!

Lauren
Good morning Carrie,

We have been reviewing MDE’s one percent waiver request and I wanted to verify a couple of items.

My first question is regarding the differences we are seeing between the total enrollment and total assessed submitted in MDE’s waiver request and the data submitted by MDE to EDFacts. I have included both sets of data, but further provided a table with the data side by side, so you can see the differences observed. I also noted a possible error in the calculation for the “Percent of Students
Participating in State Tests for all students in science in the waiver request. Could your team verify which data is accurate?

My second question is regarding the footnote I have highlighted in blue on assessment participation from MDE’s waiver request. The statement says the number of students expected is based on enrollment counts from Fall 2023, rather than Fall 2022/Spring 2023 enrollment as the title of the table suggest. Again, we just want to verify which data is accurate.

EDFacts Data

<table>
<thead>
<tr>
<th>Year: 2022-2023</th>
<th>Total Enrollment</th>
<th>Total Assessed</th>
<th>Percent Participation</th>
</tr>
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<tbody>
<tr>
<td><strong>MICHIGAN</strong></td>
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</tr>
<tr>
<td>Mathematics</td>
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</tr>
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<td>Children with one or more disabilities (IDEA)</td>
<td>100,288</td>
<td>95,863</td>
<td>95.59%</td>
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<tr>
<td>All Students</td>
<td>721,657</td>
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<td>97.30%</td>
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<td>Reading/Language Arts</td>
<td>100,288</td>
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<td>95.19%</td>
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<td>721,657</td>
<td>702,430</td>
<td>97.34%</td>
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<tr>
<td>All Students</td>
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<tr>
<td>Science</td>
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<tr>
<td>Children with one or more disabilities (IDEA)</td>
<td>41,007</td>
<td>38,419</td>
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<tr>
<td>All Students</td>
<td>314,585</td>
<td>301,491</td>
<td>95.84%</td>
</tr>
</tbody>
</table>

MDE Waiver Request

Table 4: 2022–23 English Language Arts (Grade 3-8 and 11) Participation in State Summative Assessment (M-STEP, MME, MI-Access), Overall and for Students with Disabilities by Content Area

95.68% ?

<table>
<thead>
<tr>
<th>SWD</th>
<th>ALL Students</th>
</tr>
</thead>
</table>
| 301,127/314,730 = 95.68% | }
Thank you for your time looking over and verifying this data.

Respectfully,

Lauren Boyter

Lauren Boyter- Lauren.boyter@ed.gov
Don Peasley- Donald.peasley@ed.gov
Kathleen Banks- Kathleen.banks@ed.gov
Clayton Hollingshead- Clayton.hollingshead@ed.gov

State Assessment Team, School Support and Accountability (SSA)
Office of Elementary and Secondary Education (OESE)
US Department of Education
Email the OESE Assessment Team at ESEA.Assessment@ed.gov

From: Davis, Carrie (MDE-Contractor) <DavisC58@michigan.gov>
Sent: Tuesday, January 9, 2024 9:47 AM
To: OESE.ESEA.Assessment <ESEA.Assessment@ed.gov>; Peasley, Donald <Donald.Peasley@ed.gov>
Cc: Hinman, Shannon (MDE) <HinmanS@michigan.gov>; Jaquith, John (MDE) <JaquithJ1@michigan.gov>; Cullum, Jerry (MDE) <CullumJ@michigan.gov>; Mozden, Chantel (MDE) <MozdenC@michigan.gov>
Subject: Request to Extend the Waiver for 1.0 Percent Cap Waiver
Good morning,

Please accept the attached school year 2023-24 request to extend the waiver for the 1.0 percent cap for Michigan. I’m sending this email today, January 9, 2024, which is 90 days prior to the start of Michigan’s summative assessment window, April 9, 2024. Could you confirm that this was received?

Program Finance Secretary
Michigan Department of Education
Office of Special Education
Office Phone: 517-241-1235
Cell Phone: 517-216-0211
Fax #: 517-241-7141