



Report on 2011 District of Columbia Comprehensive Assessment System Test Security Investigation

June 21, 2012

Contract DCPO-2012-C-0378

CONTAINS CONFIDENTIAL INFORMATION

Submitted To:

Hosanna Mahaley
State Superintendent of Education
Office of the State Superintendent of Education
Government of the District of Columbia
810 First Street, NE, 5th Floor
Washington, D.C. 20002

Submitted By:

Joseph T. Gardemal III, CPA/ABV, CFE, CGFM
Melissa Glynn, Ph.D.
Alvarez & Marsal
Columbia Square
555 Thirteenth Street, NW
Washington, D.C. 20004



June 21, 2012

Hosanna Mahaley
State Superintendent of Education
Office of the State Superintendent of Education
Government of the District of Columbia
810 First Street, NE, 5th Floor
Washington, D.C. 20002

Dear Ms. Mahaley,

Alvarez & Marsal (A&M) is pleased to submit this report in connection with our 2011 DC Comprehensive Assessment System (DC CAS) Test Security Investigation. The report consists of two sections.

Section 1 addresses our review of all District-wide documentation and policies regarding test administration and test security. Our review encompassed the following: (1) general testing policies and procedures for District of Columbia public and public charter schools, including all State-issued policies, procedures, and documents; (2) the roles and responsibilities of all Office of the State Superintendent of Education (OSSE), Local Education Agency (LEA)-administration, and school-level Staff related to test administration; and (3) training materials related to test administration and security developed and distributed by the State or individual LEAs.

Section 2 addresses our on-site investigations in 70 classroom locations identified as having possible test security violations by OSSE and/or District of Columbia Public Schools (DCPS). At each location, we conducted reviews of test plans, physical security procedures, training materials, and test administration procedures. We interviewed: (1) administrative personnel at each identified school, (2) Test Administrators and students associated with the OSSE and DCPS-selected classrooms, and (3) Test Administrators and students from other classrooms, as well as DCPS monitors. We performed follow-up interviews with certain individuals to whom we did not have access during our initial on-site visits.

We sincerely appreciate your assistance and cooperation in facilitating our work.

Respectfully Submitted,


Melissa Glynn
Managing Director
Alvarez & Marsal Public Sector Services, LLC


Joseph T. Gardemal III
Managing Director
Alvarez & Marsal Global Forensic & Dispute Services, LLC



Introduction 1

Executive Summary..... 1

Section 1: 2011 DC CAS Policies and Procedures Review 3

 Summary 3

 Introduction 3

 Review Approach 3

 2011 Policies and Procedures Review..... 4

 Policy and Procedure Documents Reviewed 4

 Communications and Timeframes 6

 Roles and Responsibilities 6

 Training 6

 Violations 7

 Monitoring 8

 Invalidation of Scores..... 8

 Access and Security..... 9

 Potential Weaknesses & Recommendations 9

Section 2: On-Site Classroom and School Investigations 13

 OSSE Selection Methodology..... 13

 DCPS Selection Methodology..... 13

 Classrooms Investigated 14

 On-Site Investigation Process 16

 Test Security Violations Defined by OSSE 17

 School Personnel Test Security Violations: 18

 Student Test Security Violations: 19

 Classification of Findings 20

 Summary of On-Site Investigation Findings..... 20

Appendix A: School Investigation Reports 1

INTRODUCTION

To perform the 2011 DC CAS Test Security Investigation, A&M created a multi-disciplined team of fifteen (15) professionals from our Public Sector Services (PSS) and Global Forensic and Dispute Services (GFD) practices with backgrounds in investigations, independent assessments, and experience working on behalf of K-12 education clients. Joseph T. Gardemal III, a Global Forensic and Dispute Services Managing Director and Melissa Glynn, a Public Sector Managing Director, led the team.

A&M's GFD provides specialized investigative and analytical services to help resolve complex accounting and financial issues and disputes. We work closely with law firms, corporate boards, and management of companies and public sector clients involved in multifaceted commercial, financial and accounting disputes and irregularities. Our team conducts rigorous accounting, financial and economic analysis to help resolve a range of disputes – from internal irregularities to litigation – from the boardroom to the courtroom. In addition, GFD conducts comprehensive corporate and technology investigations to help companies identify and mitigate risks and properly address internal or external accounting and financial inquiries.

A&M's PSS practice focuses on driving transformational change with local, state, and federal clients. We have worked with multiple large, urban districts to resolve critical challenges including Special Education management, designing weighted student funding approaches, and driving cost management execution programs.

Joining our practices provided a team with deep investigative capabilities and a track record of working on behalf of school districts. Our heritage in fact-based performance drives our commitment to identifying deviations from established policies as testing was implemented at the classroom level.

Our team consisted of 15 members, all from our Washington, D.C. office. These team members performed the policy review and conducted field investigations at the selected classrooms and school campuses during the period from March 13 through April 13, 2012.

EXECUTIVE SUMMARY

Based upon review of policies and procedures coupled with information from the school-based interviews, test security in DC lacks controls as evident in implementation at the school level. Specifically, we have identified significant variability in the allocation and role of personnel in key testing functions including Proctors and in the execution of practices (management of sweeps, check-in processes, etc.).

In past practice, once notified by OSSE, LEAs conducted their own investigations. This year, for the first time, OSEE hired an independent party (A&M) to conduct investigations.

Our investigation revealed a number of test security irregularities, the majority of which related to training of school-level personnel in the appropriate conduct of the DC CAS. Our recommendations include clarification of roles and responsibilities for Test Coordinators, Test Administrators and other school personnel, and implementation of a standardized DC CAS administration training process at the school level.

Despite identified opportunities to improve the overall testing process, few incidents of critical testing violations were found through the investigative process.

SECTION 1: 2011 DC CAS POLICIES AND PROCEDURES REVIEW

Summary

Each year, the performance of District of Columbia students in schools, Local Education Agencies (LEAs), and across the state is measured using the DC CAS. The results are compared against annual performance targets to determine whether the school, LEA, or state has made adequate yearly progress (AYP), as required by the 1994 re-authorization of the Elementary and Secondary Education Act (ESEA) and the No Child Left Behind (NCLB) Act of 2001. OSSE requires the administration of the DC CAS to students in Grades 3-8 and 10 enrolled in the State. The DC CAS assesses students on reading and math in grades 3-8 and 10, science in grades 5 and 8, biology in high school, and composition in grades 4, 7, and 10. The testing process occurs over a two week period in April.

The policies and procedures provide a framework and governance for the testing processes and support their integrity and security. This report provides an overview of documented policies and procedures supporting operational execution of the DC CAS administration process, focused on testing security. Review of documented policies and procedures provides appropriate context for field investigations of school personnel involved in the administration process, supporting assessment of their adherence to standards communicated by the State and LEA. This review provides an overview of how policies and procedures were communicated prior to the 2011 administration of the DC CAS and recommendations for improving administration practices.

Introduction

As part of the overall assessment, A&M completed a review of all District-wide documentation and policies regarding test administration and test security. Those policies and procedures include all general testing policies and procedures for District of Columbia public and public charter schools, including all District-issued policies, procedures, and documents. We also reviewed the roles and responsibilities of all OSSE, individual LEA-administration, and school-level Staff (including volunteers and students) as related to test administration, and any and all training materials around test administration and security developed and distributed by OSSE or individual LEAs including Charter schools.

This review represents a comprehensive assessment including high-level summaries and detailed documentation of all reviews performed. This report identifies weaknesses identified in the policies reviewed, identifies possible test security breaches, and provides recommendations on how such policies and procedures can be improved.

Review Approach

Upon contract award, A&M initiated meetings with management from OSSE responsible for assessment, including administration of the DC CAS. These initial sessions provided orientation to the DC CAS administration process, the schedule, and analyses methodology which supported the determination of flagged classrooms based upon results of the 2011 administration of the DC CAS. Additional documentation was requested after the initial meetings. Additionally, A&M reviewed administration materials publicly available from other State Educational Agencies (SEAs) including Massachusetts and

Delaware, and reviewed other best practice overviews including a report published by the Council of Chief State School Officers (CCSSO) in 2010 titled, *Operational Best Practices for Statewide Large-Scale Assessment Programs* (Best Practices). This document represents the joint efforts of working groups focused on development of a best practices document, covering all major components of operating a large scale state assessment program, from procurement to reporting test scores. The topics covered by the Best Practices are central to the tasks of designing, developing, administering, and scoring state assessments, and reporting state assessment results. Moreover, the operating practices described are considered to be reasonable and feasible, each having been reviewed carefully by both state assessment program leaders and testing industry veterans who are very familiar with the complexities of specific functions of state testing programs. The working group’s membership represented the Association of Test Publishers (ATP) and the CCSSO.

The review of other states’ documented administration processes (i.e., Oregon and Tennessee) additionally provided perspective regarding the level of documentation and communication provided to support the tactical operation of statewide comprehensive assessment programs. Administration manuals available via states’ department of education websites detail similar approaches to providing school personnel with policies and procedures for assessments similar to the DC CAS.

2011 Policies and Procedures Review

Assessing the relevant documents made available from OSSE and through review of other documentation publicly available representing other districts and best practices, several administration components were identified as critical to the testing process. The key document governing DC CAS testing management from a security perspective is the DC CAS State Test Security Guidelines. These components are identified below in coordination with documentation provided by OSSE.

Policy and Procedure Documents Reviewed

The following provided documents were reviewed with a description provided in the table below:

Document	Author	Overview of Contents
DC CAS State Test Security Guidelines	OSSE	OSSE’s overarching policy and procedure documentation for LEAs, providing requirements for Test Security Planning and associated roles and responsibilities.
DC CAS Decision Points	OSSE	A summary and clarification of the test planning guidelines distributed to the schools, containing key points/rules for administering the test, which also highlights the test guideline changes between 2010 and 2011.
OSSE Testing Accommodations Manual	OSSE	A summary of the accommodation program for students with disabilities and English Language Learners. It provides school personnel with instructions and guidelines for determining, implementing and assessing testing accommodations for their eligible students.
2011 Chairperson’s Manual	CTB	Instructions and guidelines on DC CAS security procedures and the role and responsibilities of the Test Chairperson before, during and after

		testing.
DC Wrong to Right Answers Changes Report	CTB	A summary of the wrong-to-right erasure analysis conducted by CTB/McGraw-Hill for the 2011 DC CAS results, providing an overview of the scope of the study, the method used for analysis and the results.
Test Coordinator Training PowerPoint	OSSE	The training material to prepare the Test Chairperson for planning and leading the DC CAS testing process, summarizing the responsibilities, required test security procedures and instructions on how to prepare the school for the testing.
Operational Best Practices for Statewide Large-Scale Assessment Programs	Council for Chief State School Officers and Association of Test Publishers	Practices for designing, developing, administering, and scoring state assessments, and reporting state assessment results.

Table 1: Documents Reviewed

Policy and Procedure Key Components	OSSE					CTB		CCS SO
	DC State Test Security Guidelines 2011	DC CAS Test Directions 2012; DC CAS Test Directions 2012: Grade 3	DC CAS Decision Points 2011	OSSE Testing Accommodations Manual	DC CAS 2011 Test Chairperson's Training presentation	DC CAS 2011 Wrong-to-Right Answer Changes Report	DC CAS 2011 Test Chairperson's Manual	Operational Best Practices for Statewide Large-Scale Assessment Programs
Communications and Timeframes	■	■	■		■		■	■
Roles and Responsibilities	■	■		■	■		■	■
Training	■	■		■	■		■	■
Violations	■						■	■
Reporting			■	■				■
Investigations			■			■		■
Monitoring	■						■	■
Invalidation of Scores		■			■		■	■

Access and Security	■	■	■	■	■		■	■
---------------------	---	---	---	---	---	--	---	---

Table 2: Policy and Procedure Components

Communications and Timeframes

Based upon a review of policies and procedures several communications components address an array of requirements to support management of the testing process, including:

- **Notification of testing timelines and processes.** The timelines include discussions of activities prior to testing (including training), during the testing process (managing security, involvement of observers), and post testing (incident reporting, investigations).
- **Coordination of alternative settings for students requiring special accommodations.** Coordinators are required to communicate with the school’s test coordinator or principal to manage the security of the testing materials and sign-off of security forms by test proctors.
- **Execution of test timeline.** OSSE’s testing directions guide the execution of testing within the given timeframes, including planning for security and testing equity implications.
- **Reporting of violations.** OSSE provides guidelines directing the LEAs on the appropriate actions and responsibilities related to dealing with alleged test violations. The guidelines include an anonymous hotline and the test incident form process.
- **Preventative measures.** OSSE’s security guidelines, which are provided during trainings, documented school test plans at the LEA level, training programs pre-testing and sessions at leadership academies.

Roles and Responsibilities

The duties assumed by OSSE, LEA, and school personnel are identified through a variety of documents associated with this review including:

- OSSE defines responsibilities for the following roles: LEA Assessment Coordinator, Principal, Test Chairperson, Test Administrator, Test Proctor and Monitors.
- The DC CAS 2012 Test Directions specify the practical responsibilities and execution instructions for school personnel during the testing process, aimed at maintaining test integrity and security for the OSSE assessment and accountability program.
- The DC CAS Test Security Guidelines are issued by OSSE to accompany the Test Directions.

Training

Documentation indicates that OSSE provide training. OSSE directs the state administration training.

Role	Training Provided	Training Responsibilities
Training Provided by OSSE		
LEA Test Coordinator	<ul style="list-style-type: none"> • Training provided is not specified <p>Based on the LEA test security plan, the role requires devising a system for training the schools on state test administration guidelines, state test security, and security and confidentiality of individual test data.</p>	<ul style="list-style-type: none"> • Familiarization with testing guidelines and security protocols.
Principal	<ul style="list-style-type: none"> • May attend the state, LEA or school administration training, per their LEA Assessment Coordinator. 	<ul style="list-style-type: none"> • Delivers training to Test Chairperson and any others handling test materials. [DC CAS State Test Security Guidelines 2011].
Test Chairperson	<ul style="list-style-type: none"> • State Test Administration training 	<ul style="list-style-type: none"> • None.
Test Administrator	<ul style="list-style-type: none"> • Attends Principal-delivered training 	<ul style="list-style-type: none"> • None.

Table 3: Training

Violations

Twenty actions are identified in the DC CAS 2011 Test Security Guidelines as constituting violations determined by OSSE. These violations are described in Section 2 of this report, and include, but are not limited to: unethical behavior, refusal to sign the non-disclosure document, direct management in a manner inconsistent with the Test Chairperson’s Manual, use of external devices including calculators, and disclosure of testing contents. Student violations are also stipulated, specifying actions a student might take that would constitute state test security violations. These activities include sharing answers, disrupting the testing process, and/or doing anything to inflate testing outcomes.

Reporting

- OSSE requires that school personnel report an alleged incident within 24 hours after testing
- There are three ways to report a test security incident: Report the incident to the school principal or the head of the school, who will then report to the LEA Assessment Coordinator; report an incident directly to OSSE; or use the anonymous tip line.

Investigations

- Test Security violation allegations can be a product of:
 - A reported incident
 - OSSE’s monitoring and auditing
 - Annual test integrity analyses conducted on the DC CAS results, which include looking at student erasures and unusual growth patterns in student performance
 - Missing test materials, identified from the missing materials report that is generated after every test administration, and also noted in the school’s Security Checklist and in the Exceptions Survey.

- Potential violations are initially reviewed in three areas, in determining whether or not to proceed with an investigation:
 - Led to a breach of test item security
 - Impacted the validity of student performance and scores
 - Deliberate violation; there is evidence of academic fraud
- If further investigation is deemed necessary, OSSE has two courses of action – an LEA investigation in which the LEA investigates and reports the findings to OSSE; and an Independent investigation, conducted by an OSSE-appointed, independent party.
- In an LEA investigation, OSSE determines whether a violation occurred and the appropriate course of action; the State Superintendent of Education hears any appeal of the decision from the LEA, and the Office of Elementary and Secondary Education makes the final determination of the validity of the findings and the appropriateness of the prescribed action.
- For the 2011 DC CAS results, OSSE contracted with A&M for all investigations that were part of its annual test integrity analysis.

Monitoring

Each LEA must describe its monitoring process within its Test Security Plan and schools within LEAs are subject to OSSE monitoring without prior notice. OSSE may also conduct post-testing assessments without prior notice [based upon OSSE test security protocols].

Invalidation of Scores

From an OSSE perspective, an invalidated score limits the ability of the LEA to count the student in federal reporting and disallows the student from evaluation.

OSSE defines the criteria, circumstances, and instructions for invalidating test scores in the DC CAS 2012 Test Directions, the DC CAS 2011 Chairperson’s Manual, and the OSSE Testing Accommodations Manual.

The guidelines for test invalidation, for general education and accommodated testing, instruct that tests should only be invalidated in rare cases; for example: if a student becomes ill and cannot complete the test, or, in the event a student receives inappropriate assistance, a section or the test in its entirety is rendered invalid. Instructions for school personnel on how to invalidate test scores are also provided, and the guidelines differ across grade levels and among test subjects.

In concert with general education invalidation circumstances, there are specific situations within the accommodated testing guidelines that warrant an invalidation of a student’s scores. Accommodations are provided on the DC CAS test for students with Individualized Education Programs (IEPs), 504 Plans, and students with disabilities who are also English Language Learners (ELL), and aim to equalize learning expectations between general and special education students. Modifications to a student’s pre-determined accommodations, such as revising assessments to make them easier or giving a student hints to correct test responses, are practices that alter learning expectations, and providing a student with a modification invalidates the student’s test and score.

The guidelines for the DC CAS-Alternative Assessment, which allows students with significant cognitive disabilities to be included in OSSE’s assessment and accountability system, indicate that if a student without significant disabilities is tested under the Alternative Assessment, their results will be invalidated and they will be counted as non-participants. [Based upon OSSE test security protocols].

Access and Security

- As outlined in the 2011 DC CAS Decision Points, external seals were placed on testing booklets with the seal to be broken only by the student taking the assessment [protocol new for 2011].
- The Security Exceptions Survey is the form designated to identify any materials not returned to the testing vendor.
- The State Test Security and Non-Disclosure Agreement is required to be signed by each person involved in the administration of the state test and the LEA must keep on file the signed forms for a period of four years.
- Within the DC CAS 2012 Test Directions, OSSE identifies specific security guidelines for test execution, which articulate instructions and protocols for the distribution, collection, and handling of test materials for all school personnel.
- A Test Administrator is required to be an employee of the LEA – for example: teachers, paraprofessionals, counselors, administrators, and librarians. Similarly, there are specific qualifications for Proctors; an individual serving as a proctor can be teacher’s aide, parent, or other district or school personnel. The proctors are subject to screening and parents cannot proctor a classroom in which their children are testing.

Potential Weaknesses & Recommendations

A comparison of best practices from the Chief School State Officers and review of other State Education Agency Test Security¹ yield the following potential weaknesses and supporting recommendations:

Area	Potential Weakness Identified	Recommendations
Communications		
OSSE	<ul style="list-style-type: none"> • Multiple forms and plans are required to support the annual DC CAS assessment process including: LEA Assessment Plan, School Test Plan, the Test Security Plan, Accommodation Requests, and exemption for testing off school grounds and medical exemptions; yet the process for reviewing these required documents is not fully explained for all documents (the School Test Plan does state have a clear submission timeline and review process) nor are timeframes provided for the review and approval process. 	<ul style="list-style-type: none"> • Create a single, comprehensive document that fully explains all DC CAS policies and processes. • Review forms and plans for the potential to simplify supporting documentation.

¹ *Operational Best Practices for Statewide Large-Scale Assessment Programs* (Washington, DC: The Council of Chief State School Officers and Association of Test Publishers: 2010).

Area	Potential Weakness Identified	Recommendations
	<ul style="list-style-type: none"> There is no comprehensive listing of all forms, checklists, and plans required to support the DC CAS process. 	
Roles and Responsibilities		
OSSE	<ul style="list-style-type: none"> It is recommended, but not required, that schools use Proctors to ensure there are two people in all of the classrooms, making the level of security in the classrooms inconsistent across LEAs and within the schools. The Test Administrator’s responsibilities as to what they can do during the test are not explicitly stated in the documents; this impacts management of the classroom environment and leads to variability. 	<ul style="list-style-type: none"> Review security recommendations in order to provide consistency across LEAs. Create a Test Administrator Responsibilities section that clearly explains expectations of behavior during a test, and consider adopting for the charter schools.
Test Material Storage		
OSSE	<ul style="list-style-type: none"> The 2011 DC CAS Security Guidelines require the materials to be kept in “secure, locked storage prior to and after administration of any test and between testing sessions.” It is unclear specifically what the expectations are for secure storage, and who should be given access is not included in the guidelines. The security of the test materials and who has access to them may not be consistently applied across LEAs or schools. 	<ul style="list-style-type: none"> Review and define secure storage, as well as access in documented guidelines. Ensure consistency across LEAs and schools.
Erasure Analysis		
OSSE	<ul style="list-style-type: none"> In conducting a review of the 2011 DC CAS results, OSSE used three analysis methods: Erasure Analysis, Classroom-Level Growth, and Within Classroom Variation. The Erasure Analysis compares the classroom level wrong-to-right erasures average within each classroom to the state average plus four standard deviations, and divides the number of students into the standard deviation. The results identified those classrooms with high wrong-to-right averages. The DC CAS 2011 Decision Points document indicates that the test directions for students contain the following guidance on changing answers: “Do not change an answer unless you have good reason to believe its wrong.” The document states that the intention is not to 	<ul style="list-style-type: none"> Based upon review of analysis methods, improved explanatory capabilities will be achieved through aligning flagging methods with erasure analysis specific to those students who receive accommodations. Develop a guideline for test administrators on answer sheet erasures, including explicit directions for students on reviewing answers and changing them properly, while

Area	Potential Weakness Identified	Recommendations
	<p>discourage erasing, only caution students to do so when they know it's incorrect. This statement provides clearer instructions on erasures for students, but there are not guidelines for test administrators around the circumstances and method for erasing.</p> <ul style="list-style-type: none"> The erasure analysis treats equally the results from all classrooms. Classrooms with students who do not require testing accommodations, traditional students, and those with students who test under special accommodations, special education students, are identically analyzed and the results do not take into account the difference in the testing environments or in the students' abilities. 	<p>emphasizing the importance of encouraging students to check their work.</p>
Testing Environment / School Profiles and Scoring		
OSSE	<ul style="list-style-type: none"> In 2011, the schools were provided 6 options for a testing schedule, with the extremes being, compacting testing into 1 week vs. stretching it out over 2 weeks. The students were not tested under the same conditions, but the variation of test conditions is not considered in the performance analysis determining flagged classrooms. Testing conditions are impacted by accommodations, yet accommodations are not isolated in performing the statistical analysis associated with flagging. 	<ul style="list-style-type: none"> Review testing conditions and time frames to ensure consistency across all test periods. The DC CAS flagging methodology should consider accommodations and their statistical significance at the classroom level.
Training		
OSSE	<ul style="list-style-type: none"> The 2011 DC CAS Security Guidelines instruct the Test Chairperson to "conduct training sessions for Test Administrators and helpers," however; there are no explicit instructions and / or requirements as to the training of test administrators and proctors. The Guidelines do not establish training requirements or specific content to be used in the training, and required timing and frequency of training session(s) is not included. OSSE does not have standard training documents for the Test Chairperson and they are not required to submit to OSSE a plan for how and when training will be conducted. 	<ul style="list-style-type: none"> Create a training guide for the Test Chairperson that defines the required content, timing and frequency of DC CAS training sessions. Also included should be standard training materials, an attendee list, and the learning expectations for each individual filling a role that requires training.

Area	Potential Weakness Identified	Recommendations
Reporting Security Violations		
OSSE	<ul style="list-style-type: none"> In the 2011 DC CAS Security Guidelines, OSSE articulates the instructions for the three ways to report a test security incident: Report the incident to the principal or head of the school, who will then report to the LEA Assessment Coordinator; report directly to OSSE; or use the anonymous tip line. Incidents should be reported to OSSE within 24 hours of occurrence. The Guidelines do not require schools to document a formal process, including requiring that the school staff be made aware of these reporting methods. 	<ul style="list-style-type: none"> Redefine Security Guidelines to require training of reporting methods.

Table 4: Recommendations

SECTION 2: ON-SITE CLASSROOM AND SCHOOL INVESTIGATIONS

OSSE and DCPS identified a total of 70 classrooms in 38 schools for investigation. OSSE initially selected 34 classrooms in 24 schools. Exercising an OSSE-authorized option to add more schools, DCPS identified an additional 36 classrooms in 14 schools. On March 9, 2012, A&M reviewed OSSE's selection methodology with Tamara Reavis of OSSE, and on March 12 and March 15, 2012, we reviewed the DCPS selection methodology with Cate Swinburn of DCPS (March 12); David Stewart of Tembo Consulting, Inc., consultants to DCPS (March 15); and Victoria Nomdedeu of DCPS (March 12 and 15).

OSSE Selection Methodology

OSSE selected classrooms for investigation using three analyses:

1. An erasure analysis performed by the testing vendor CTB/McGraw-Hill, which identified unusual patterns of wrong-to-right erasures,
2. A classroom-level growth analysis which considered growth in percentile and performance levels from the 2010 CAS to the 2011 CAS in classrooms with more than ten students, and
3. A within-classroom variation analysis, which identified classrooms in which little variance appeared among student scores.

Classrooms identified using two or more of these analyses were selected for on-site investigation. This analysis resulted in the identification of 34 classrooms in 24 DCPS and D.C. Public Charter Schools (PCS) for investigation.

DCPS Selection Methodology

DCPS used a complementary methodology to identify classes requiring investigation. The DCPS methodology relied on:

1. Three Achievement Metrics, which evaluated measures of student performance, including:
 - a. CAS Growth Percentile,
 - b. Performance Level Gain, and
 - c. CAS minus Benchmark Assessment System (BAS) Growth Percentiles.
2. Two Wrong-to-Right Metrics
 - a. Wrong-to-right erasures 2011
 - b. Wrong-to-right erasures 2010.

If the average of these five metrics was one standard deviation or greater from the mean, then DCPS selected the classroom for investigation. This methodology resulted in the identification of an additional

36 classrooms in 14 DCPS schools for investigation, one of which was based on a Fall 2011 incident report that had not been closed out, and which required further investigation.

A&M did not participate in the selection or design of the classroom selection methodologies. Therefore, all of the classrooms on which we conducted investigations were identified for us by OSSE and DCPS. However, our review of the methodologies provided evidence that appropriate approaches were utilized to select classrooms for investigation.

Classrooms Investigated

We conducted on-site investigations at the following schools, with the exception of Hamilton Education Campus and Nia PCS, which closed at the end of the 2011 school year.² In some cases, principals, test coordinators, or test administrators may have left the District of Columbia education system or relocated to different schools within the system. We attempted, with the assistance of OSSE and DCPS, to locate and interview any individuals still working in the system at March 2012.

No.	School Name	Teacher 2011	DCPS Flag	OSSE Flag
1	Ballou HS	[REDACTED]	X	
2	Banneker HS	[REDACTED]		X
3	Banneker HS	[REDACTED]	X	
4	Banneker HS	[REDACTED]	X	
5	Brightwood EC	[REDACTED]	X	X
6	Browne EC	[REDACTED]	X	
7	Cardozo HS	[REDACTED]	X	
8	Cardozo HS	[REDACTED]	X	
9	Columbia Heights EC	[REDACTED]	X	
10	Columbia Heights EC	[REDACTED]	X	
11	Columbia Heights EC	[REDACTED]	X	
12	Columbia Heights EC	[REDACTED]	X	
13	Columbia Heights EC	[REDACTED]	X	
14	Columbia Heights EC	[REDACTED]	X	
15	Columbia Heights EC	[REDACTED]	X	
16	Columbia Heights EC	[REDACTED]	X	
17	Columbia Heights EC	[REDACTED]	X	
18	Hamilton EC (Closed)	[REDACTED]		X
19	Haynes PCS - Georgia Avenue	[REDACTED]		X
20	Hyde Leadership PCS	[REDACTED]		X
21	JO Wilson ES	[REDACTED]	X	
22	JO Wilson ES	[REDACTED]		X
23	Kimball ES	[REDACTED]		X
24	King, ML ES	[REDACTED]		X
25	King, ML ES	[REDACTED]	X	
26	King, ML ES	[REDACTED]	X	
27	KIPP DC: Key Academy PCS	[REDACTED]		X

² We interviewed the Hamilton Test Administrator selected for investigation at his/her current school, [REDACTED].

No.	School Name	Teacher 2011	DCPS Flag	OSSE Flag
28	Kramer MS	[REDACTED]	X	
29	Kramer MS	[REDACTED]	X	X
30	Langdon EC	[REDACTED]		X
31	Langdon EC	[REDACTED]	X	
32	Langdon EC	[REDACTED]		X
33	Langdon EC	[REDACTED]		X
34	Langdon EC	[REDACTED]	X	X
35	Langdon EC	[REDACTED]		X
36	Langdon EC	[REDACTED]		X
37	Lasalle-Backus EC	[REDACTED]	X	
38	Leckie ES	[REDACTED]	X	X
39	Leckie ES	[REDACTED]		X
40	Leckie ES	[REDACTED]	X	
41	Leckie ES	[REDACTED]	X	
42	Ludlow-Taylor ES	[REDACTED]		X
43	Mary McLeod Bethune PCS	[REDACTED]		X
44	Maury ES	[REDACTED]	X	
45	Maya Angelou PCS - MS	[REDACTED]		X
46	Maya Angelou PCS - MS	[REDACTED]		X
47	MC Terrell ES	[REDACTED]		X
48	Meridian PCS	[REDACTED]		X
49	Meridian PCS	[REDACTED]		X
50	Moten ES	[REDACTED]	X	
51	Murch ES	[REDACTED]	X	
52	Nia Community PCS	[REDACTED]		X
53	Oyster-Adams Bilingual School	[REDACTED]	X	
54	Phelps ACE HS	[REDACTED]	X	
55	Prospect Learning Center ES	[REDACTED]	X	
56	Prospect Learning Center ES	[REDACTED]	X	
57	Prospect Learning Center ES	[REDACTED]	X	X
58	Prospect Learning Center ES	[REDACTED]		X
59	Raymond EC	[REDACTED]		X
60	Ron Brown MS	[REDACTED]		X
61	Simon ES	[REDACTED]		X
62	Stuart-Hobson MS	[REDACTED]	X	
63	Stuart-Hobson MS	[REDACTED]	X	
64	Tree of Life PCS	[REDACTED]		X
65	Truesdell EC	[REDACTED]	X	
66	Tubman ES	[REDACTED]	X	
67	West EC	[REDACTED]	X	
68	Winston EC	[REDACTED]		X
69	Winston EC	[REDACTED]		X
70	Winston EC	[REDACTED]	X	

Table 5: Classrooms Selected by OSSE and DCPS for Investigation

On-Site Investigation Process

Using the selected classroom list above, A&M coordinated with OSSE and DCPS to arrange for site visits to the relevant schools, and to other schools, to the extent key individuals had transferred from their 2011 positions. OSSE and DCPS provided critical support in our efforts to locate and schedule interviews with transferred personnel and those on medical leave.

For each of the selected classrooms, a team of two A&M personnel, one each from PSS and GFD, visited the school and conducted interviews, generally over the course of a full school day. In some cases, interviewers remained on site for two days to complete interviews. Principals were notified as to the date of our site-visits, but were not provided the names of the interviewees in advance of our arrival. For individuals who were unavailable on the date of the initial site visit, we scheduled and conducted follow-up interviews. Wherever possible, we attempted, with the assistance of OSSE and DCPS, to schedule interviews with identified individuals who were no longer with the school system.

In addition, we interviewed DCPS-assigned observers for certain schools.

The interviewers utilized five interview protocols at each school, with approximately 60 questions each. We designed each protocol to elicit information related to the interviewee's role in the DC CAS testing process. The protocols focused generally on:

1. Background (approximately 5 questions). These questions related to the individual's history at the school and familiarity with the administration of the 2011 DC CAS.
2. Process (approximately 25 questions). Process questions are designed to elicit the individual's understanding of:
 - a. The 2011 DC CAS Security Guidelines issued by OSSE,
 - b. the required DC CAS training, and completion of Non-Disclosure Agreements by staff members,
 - c. School Test Plans, Security Checklists, and Test Directions Manual,
 - d. security procedures for test materials before, during, and after test administration
3. Culture (approximately 10 questions). These questions are designed to elicit information on the environment at the school, in particular whether the school culture is one in which faculty, staff, and students can report concerns over potential violations of testing standards without fear of retaliation.
4. Behavior (approximately 30 questions). Behavioral questions are designed to obtain information on the individual's awareness of specific activities in the school that likely constitute test violations. We specifically asked each individual whether they had cheated on the 2011 DC CAS and whether they were aware of others who may have cheated. This section included questions on types of test violations most often reported, including:

- a. Assisting students by identifying incorrect answers on test sheets
- b. Reading correct answers aloud during testing
- c. Erasing students' incorrect answers and replacing them with correct answers
- d. Obtaining test materials in advance of the test
- e. Arranging seating to allow weaker students to copy stronger students' answers

The protocols were prepared for:

1. Principals,
2. Test Coordinators,
3. Test Administrators,
4. Proctors and Monitors, and
5. Students.

In addition to interviewing Test Administrators, Proctors, and Students for each of the classrooms selected by OSSE and DCPS, we interviewed other individuals not associated with the selected classrooms to gain a broader understanding of the testing environment in the school.

All interviews were conducted with two A&M personnel present - a lead interviewer and a scribe. Except in cases where a school staff member requested the presence of a Washington Teachers' Union (WTU) representative, and in the case of Haynes PCS, where the [REDACTED], [REDACTED], insisted on sitting in on interviews despite our repeated objections, all interviews of adults were conducted with no one else present.³ Interviews with students were conducted with a Principal-designated school staff member present, and A&M provided each student with a parental notification form prepared by OSSE or DCPS.

In instances where potential violations were disclosed through student interviews, A&M attempted to corroborate that information through interviews with other students/school personnel. Where potential violations were disclosed through interviews with school personnel, A&M attempted to corroborate in instances where another individual was being implicated.

The School Investigation Summary Reports are at Appendix A to this document.

Test Security Violations Defined by OSSE

The DC CAS 2011 Test Security Guidelines identify specific examples of testing violations for both school personnel and students. A&M used these guidelines to determine whether information developed

³ The incident with [REDACTED] is described in detail in the Haynes School report.

through our individual school and classroom investigations constituted potential testing violations. The specific violations⁴ identified in the Test Security Guidelines are as follows:

School Personnel Test Security Violations:

No.	Test Security Violation	Group
1	Refusal to sign the State Test Security and Non-Disclosure Agreement	3
2	Administering state tests in a manner that is inconsistent with the administrative procedures provided by the DC Office of the State Superintendent of Education in the Test Chairperson’s Manual	2
3	Engaging in discussions, instruction, or reviews of any contents of any portion of a state test before, during, or after the testing period	4
4	Making a false certification on the test security form established by the DC Office of the State Superintendent of Education	3
5	Aiding or assisting an examinee with a response or answer to a secure test item or prompt	4
6	Editing a student’s response to a constructed response item or written prompt when transcribing the student’s response	4
7	Providing inaccurate data along with portfolio entries for the DC CAS-Alt, including incorrect grading of student work	3
8	Submitting student work for the DC CAS-Alt portfolio not done by the student or with inappropriate assistance	4
9	Providing unapproved test accommodations to a student	3
10	Failing to read test administration scripts verbatim as required by the Test Administrator’s Manual	2
11	Allowing students in grades 3-6 the use of calculators in the mathematics test	4
12	Administering a state test on dates other than specified without prior approval of the LEA and OSSE	3
13	Scoring student responses	3
14	Making statements regarding the accuracy of the student’s responses on the state	4

⁴ The respective group classifications of the test security violations are described in the “Classification of Findings” section below.

No.	Test Security Violation	Group
	test	
15	Failing to return and account for all testing materials as soon as the testing session has terminated	3
16	Reproduction in any form of the test items	4
17	Failure to collect all student test materials	3
18	Using a cell phone during test administration	3
19	Failure to report any state test security breach	3
20	Allowing anyone to review the secure state test	4

Table 7: School Personnel Test Security Violations

Student Test Security Violations:

No.	Test Sec No.	Group
1	Sharing test answers with another student through written, electronic, verbal, or gestured means	4
2	Copying another student's answers, or requesting or accepting any help from another person	4
3	Using any materials or equipment not expressly permitted by the Test Administrator's Manual	4
4	Answering a test question or providing assistance to another student either before or while that student is taking the test	4
5	Returning to a previously administered section of a test after that test section is completed	3
6	Engaging in any other practice to artificially affect the student's score or the score of another student	4
7	Using a cell phone during testing	4
8	Attempting to or taking a test or portion of a test on behalf of another student	4
9	Disrupting the state testing process	2

Table 8: Student Test Security Violations

Classification of Findings

In collaboration with OSSE, we have classified our findings, by school, into four categories, based on relative severity. The categories are as follows:

Group	Description
1 - No Findings	No evidence of test security violations, wrongdoing, or error
2 - Minor	Minor test administration errors (e.g., incomplete or missing test documents, inconsistencies in the application of administration procedures)
3 - Moderate	Defined violations; not test tampering or academic fraud (e.g., failure to report certain types of incidents, failure to distribute, collect or refusal to sign Non-Disclosure Agreements, use by administrators of cell phones and other unapproved electronic devices)
4 - Critical	Definitive test security violations; test tampering or academic fraud (e.g., providing students' answers; allowing student use of calculators or other technology when prohibited)

Table 9: Group Classifications

We classified schools as detailed in the summary of findings presented below. One school, which was closed after the 2011 school year, received no rating.

Summary of On-Site Investigation Findings

We have included in this report all incidents of test security violations detected during our investigations. However, certain of the incidents reported below have not been corroborated by a second source, and should be considered alleged incidents, rather than confirmed incidents.

No.	School Name	DCPS/ Charter	OSSE Flag	DCPS Flag	Group	Summary of Findings
1	Ballou HS	DCPS		X	1	No potential testing violations identified.
2	Banneker HS	DCPS	X	X	3	No signed State Security and Non-Disclosure Agreements [Group 3]. Unreported incident involving one student allegedly attempting to cheat by looking at another student's test during testing.

No.	School Name	DCPS/ Charter	OSSE Flag	DCPS Flag	Group	Summary of Findings
						Uncorroborated by other students and unknown by adults [Group 3].
3	Brightwood EC	DCPS	X	X	1	No potential testing violations identified.
4	Browne EC	DCPS		X	2	2011 Test Security and Non-Disclosure Agreements missing for Principal and Test Coordinator [Group 2].
5	Cardozo HS	DCPS		X	1	No potential testing violations identified.
6	Columbia Heights EC	DCPS		X	2	<p>The Test Security Checklist for High School grades was missing student names. The checklist had test booklet numbers but no student names [Group 2].</p> <p>A student reported that the Test Administrator would not give the answer to questions but would provide “hints” by giving the definition of words. This report was not corroborated by three other students from the class who we interviewed [Group 2].</p> <p>It was alleged that a test booklet was left in the hallway by a Teacher. This incident was allegedly brought to the attention of the Test Coordinator who allegedly stated that it “didn’t matter” as this wasn’t a “scored” test. This was not corroborated by the Test Coordinator or a review of CHEC’s materials [Group 2].</p>
7	Hamilton EC (Closed)	DCPS	X		1	No potential testing violations identified.
8	Haynes PCS - Georgia Avenue	Charter	X		3	Previously-unreported incident of cell phone use in a classroom during testing [Group 3].

No.	School Name	DCPS/ Charter	OSSE Flag	DCPS Flag	Group	Summary of Findings
9	Hyde Leadership PCS (now known as Perry Street Prep PCS)	Charter	X		4	<p>Test Security Checklists (sign-in/sign-out sheets) missing [Group 2].</p> <p>Two students reported that a teacher assisted them by letting them know if they had answered a question incorrectly [Group 4].</p>
10	JO Wilson ES	DCPS	X	X	1	No potential testing violations identified.
11	Kimball ES	DCPS	X		3	<p>Test Administrator failed to inventory test materials with Test Coordinator [Group 2].</p> <p>Test security sign-in/sign-out sheets not properly documented. No evidence that test materials were signed back in to test coordinator on certain testing days [Group 3].</p> <p>Principal and Test Coordinator reported that Test Administrators review answer sheets for stray marks in the presence of the Test Coordinator [Group 2].</p>
12	King, ML ES	DCPS	X	X	4	<p>In one classroom, two students reported that their teacher pointed out correct answers [Group 4].</p> <p>In the same classroom, a student reported that the proctor read answers aloud, raising his/her voice at the correct answer. This statement was not corroborated by either of the other two students interviewed from the same classroom [Group 2].</p>
13	KIPP DC: Key Academy PCS	Charter	X		1	No potential testing violations identified.
14	Kramer MS	DCPS	X	X	2	2011 Test Security Binder missing [Group 2].

No.	School Name	DCPS/ Charter	OSSE Flag	DCPS Flag	Group	Summary of Findings
15	Langdon EC	DCPS	X	X	4	<p>Access to secured test materials is held by the Principal and Assistant Test Coordinator, not the Test Coordinator [Group 2].</p> <p>The Principal indicated that a Proctor and the Assistant Test Coordinator erased stray marks on student answer sheets [Group 2].</p> <p>Two students reported that their Test Administrator provided assistance to them and other students during the test [Group 4].</p> <p>Test security sign in/sign out sheets missing from 2011 Test Security binder [Group 2].</p> <p>One student noted that the testing classroom was left unattended by the administrator for a few minutes during the test. There was no proctor present. This statement was not corroborated by other students interviewed [Group 2].</p>
16	Lasalle-Backus EC	DCPS		X	2	<p>2011 Test Security files were incomplete. File was missing Test security sign in/sign out sheets and no signed State Security and Non-Disclosure Agreement noted for Test Coordinator [Group 2].</p>
17	Leckie ES	DCPS	X	X	1	<p>No potential testing violations identified.</p>
18	Ludlow-Taylor ES	DCPS	X		2	<p>Significant inconsistencies in responses regarding the security of the testing materials in the secured location [Group 2].</p>
19	Mary McLeod Bethune PCS	Charter	X		2	<p>The 2011 Test Security Files were purged in 2011 and were unavailable for review [Group 2].</p> <p>A Teacher identified an unreported</p>

No.	School Name	DCPS/ Charter	OSSE Flag	DCPS Flag	Group	Summary of Findings
						<p>incident regarding concerns about a significant number of erasures [Group 2].</p> <p>There are inconsistencies in responses from the Principal and Test Coordinator regarding access to the secured location for test materials [Group 2].</p> <p>Several teachers were unaware of the process for voicing test-related concerns [Group 2].</p> <p>Multiple teachers reported not having received DC CAS Test Administrator Training during 2011 [Group 2].</p>
20	Maury ES	DCPS		X	1	No potential testing violations identified.
21	Maya Angelou PCS - MS	Charter	X		3	The Assistant Principal reported that cell phones are used by Test Administrators in the classroom during testing [Group 3].
22	MC Terrell ES	DCPS	X		2	2011 Test Security Binder missing [Group 2].
23	Meridian PCS	Charter	X		2	<p>State Test Security and Non-Disclosure Agreements were missing [Group 2].</p> <p>One student reported that his/her teacher provided assistance with answers during testing. This statement was not corroborated by others interviewed [Group 2].</p>
24	Moten ES	DCPS		X	1	No potential testing violations identified.
25	Murch ES	DCPS		X	1	No potential testing violations identified.
26	Nia Community	Charter	X		N/A	School closed.

No.	School Name	DCPS/ Charter	OSSE Flag	DCPS Flag	Group	Summary of Findings
	PCS					
27	Oyster-Adams Bilingual School	DCPS		X	3	It was noted that if the Test Administrators needed help while administering the test, one of the ways they could communicate is by sending a text message [Group 3].
28	Phelps ACE HS	DCPS		X	1	No potential testing violations identified.
29	Prospect Learning Center ES	DCPS	X	X	3	A Test Administrator related a previously-unreported 2011 incident involving another Test Administrator talking on a cell phone during test administration [Group 3]. A Test Administrator reported that she picked up the test materials envelope but did not check each one to ensure codes and names matched the security list [Group 2].
30	Raymond EC	DCPS	X		1	A Proctor described a previously-unreported incident in which a Test Administrator allegedly pointed at a student's answer sheet on more than one occasion during the 2010 DC CAS. This 2010 incident is being reported as it requires further investigation by OSSE and DCPS. A&M did not investigate and OSSE did not follow up. This 2010 incident has not been considered in our rating of Raymond EC which relates to our investigation of the 2011 DC CAS administration.
31	Ron Brown MS	DCPS	X		2	The 2011 Test Security Binder was missing [Group 2].
32	Simon ES	DCPS	X		3	Some testing materials were not signed in at the end of testing days [Group 3]. The combination to the secured testing area - a vault - is located on

No.	School Name	DCPS/ Charter	OSSE Flag	DCPS Flag	Group	Summary of Findings
						the back of the vault [Group 2].
33	Stuart-Hobson MS	DCPS		X	3	<p>Multiple people were reported to have access to the secure room where the testing materials were locked up including two coaches, the guidance counselor and nurse; however, the tests were locked in a cabinet in that room and that only the counselor and Test Coordinator had keys to the cabinet. The counselor who was also previously a test coordinator stated that she did not know where the tests were stored [Group 2].</p> <p>Previously-unreported allegation involving a Teacher allegedly helping students by reading aloud during the test. It is unclear whether this was allowed due to student accommodations. Follow-up by A&M did not find evidence of wrong-doing [Group 3].</p>
34	Tree of Life PCS	Charter	X		2	Signed State Test Security and Non-Disclosure Agreements not noted for the Principal and Test Chairperson [Group 2].
35	Truesdell EC	DCPS		X	3	<p>The 2011 State Test Security Binder was missing [Group 2].</p> <p>A Test Administrator reported that cell phones were utilized by teachers during testing [Group 3].</p>
36	Tubman ES	DCPS		X	2	Testing Booklets were not consistently signed back in on April 13, 2011 [Group 2].
37	West EC	DCPS		X	1	No potential testing violations identified.
38	Winston EC	DCPS	X	X	1	No potential testing violations identified.

Table 10: Summary of On Site Investigation Findings

APPENDIX A: SCHOOL INVESTIGATION REPORTS
