



OFFICE OF THE STATE
SUPERINTENDENT OF EDUCATION

Overview of Statewide Academic Assessment Test Integrity Investigations for Local Education Agencies in the District of Columbia

Introduction

The Office of the State Superintendent of Education (OSSE) carefully reviews and analyzes statewide academic assessment practices and results every year to ensure that the results are valid and trustworthy, in accordance with its obligations under the DC *Testing Integrity Amendment Act of 2015* (D.C. Official Code §38-771.01, et seq., as amended). Expectations for test security are detailed in the annual Test Security Guidelines. As part of this annual review, OSSE's assessment vendors conduct a comprehensive data forensics analysis of all statewide academic assessment response data to identify statistical anomalies that could indicate the possibility that irregularities or security incidents occurred in the administration of statewide academic assessments. Test integrity investigations in the District are OSSE-initiated, and LEA-led. That is, in instances where OSSE has determined that anomalies in a particular school warrant further investigation, OSSE will require LEAs to conduct an investigation at the school in order to gain an understanding of the cause or causes of the anomalies. The investigation also helps OSSE determine whether the assessment results that include such anomalies are valid and trustworthy. If an investigation is a result of suspected anomalies on the part of the LEA, then OSSE will conduct the investigation.

To support LEAs in conducting test integrity investigations, OSSE provides LEAs with access to and use of the OSSE Test Integrity Protocol (O-TIP)—a standardized, fair, and objective set of investigative procedures and processes for LEAs to conduct test integrity investigations that produce trustworthy findings and outcomes. OSSE created and developed the O-TIP in accordance with recognized industry best practices for investigations of test integrity incidents. The O-TIP establishes, among other requirements and processes, what evidence and information must be collected as part of the test integrity investigation, the order of investigative steps, questions to ask during investigative interviews, and criteria for completion of each step in an investigation.

OSSE will make all materials needed to conduct an investigation available to LEAs via the OSSE Assessment Portal or other secure method agreed to by OSSE and the LEA. Each LEA required to conduct an investigation will be provided with a secure link to access their LEA-specific School Test Security Plan, in which all investigative activities will be documented, and all related data and evidence will be stored. The process for conducting the investigation will be driven by a set of eight (8) forms within the Test Integrity Investigations area of the School Test Security Plan, that each LEA will be required to complete. OSSE will have real-time access to the Test Integrity Investigations area and OSSE will reserve the right to request additional information as needed upon reviewing the forms, data and evidence submitted by each LEA.

Selection of Schools

OSSE selects schools for investigation based upon a number of factors related to assessment administration. These factors include statistical analysis conducted by the assessment vendor, test security incident reports submitted during prior school year test administration, administration practices (including but not limited to school test security plan submissions, secure test materials issues, and auditor

observation reports), and anonymous tips related to test security practices received during or after statewide assessment administration. Schools identified for investigations may be selected based upon identified anomalies related to any of the aforementioned factors, or by random identification.

Additional explanation of the components that factor into school selection can be found in Appendix A of this document. For all schools selected for investigation based upon statistical anomalies in the test response data, OSSE will provide the LEA with the actual results of the statistical analyses along with detailed explanations of the statistics used for flagging.

Conducting an LEA-led Investigation

The process LEAs are to follow to conduct an OSSE-initiated, LEA-led test security investigation is outlined in the remainder of this document.

Using the OSSE Test Integrity Protocol (O-TIP)

A total of four (4) steps makes up the investigative process as defined by the O-TIP:

1. Designation and Training of LEA Factfinders
2. Investigation Initiation & LEA Documentation Collection
3. Conducting Test Integrity Interviews
4. Investigation Closeout

To ensure that the results of the investigation are valid and trustworthy, the steps of the process as outlined here must be completed in the numerical order in which they are presented. Each step in the process has a corresponding form or forms that will need to be updated as the investigation proceeds. Each step in the investigative process is described in detail below.

Step 1: Designation and Training of LEA Factfinders

Designation and Responsibilities of LEA Factfinders

If OSSE requires an LEA to conduct an investigation, OSSE will contact the LEA Assessment Manager. The LEA Assessment Manager will be required to designate two LEA staff who will serve in the role of LEA Factfinders – one Lead Factfinder and one Secondary Factfinder. The LEA Assessment Manager may designate themselves as one of the LEA Factfinders. Factfinders must be free of conflicts of interest (e.g., have personal or family connections to school personnel or students who attend the school), and may not be a party identified in the data integrity inquiry that is under investigation. Principals or leaders of schools identified for investigation, whether the principal or leader at the time of the assessment or at the time of the investigation, also cannot serve as an LEA Factfinders. The LEA must notify OSSE, via email, of the names, employment titles, email addresses and telephone numbers of the Lead and Secondary Factfinders. If the LEA does not believe they are able to identify two LEA Factfinders who meet the above criteria, they should reach out to OSSE for guidance in completing this identification step. OSSE will email Factfinders a link used to log into the OSSE Assessment Portal via Quickbase and to gain access to their Test Integrity Investigations area containing guiding materials for the investigation. LEAs will email OSSE.TestIntegrity@dc.gov to communicate with OSSE throughout this process.

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The Lead Factfinder will serve as the primary interviewer of all witnesses and the person with primary responsibility for proper completion of all steps of the investigation. The Secondary Factfinder will serve as the notetaker during interviews, and may ask follow-up questions of witnesses during interviews, if appropriate. The Secondary Factfinder is primarily responsible for the initial entering of investigation information, data, and evidence into the Test Integrity Investigations area, with the understanding that the Lead Factfinder must review and approve everything that is entered by the Secondary Factfinder. This will ensure that accurate and comprehensive information is entered into the file. Please keep in mind that the identified Lead and Secondary Factfinders must remain in those roles for all phases of the investigation.

It is of critical importance that Factfinders maintain the confidentiality of the conduct and substance of the investigation. The investigation may not be discussed with any potential or known witnesses or any other person who might have the potential to influence any witnesses, whether inadvertently or intentionally. Interviewees must be called into the interview room during the business day without prior notice. It is the responsibility of the Factfinding team to work with school leadership to ensure that interviewees have coverage for classes they may hold. Neither Factfinders nor other LEA staff are permitted to notify witnesses in advance when they will be interviewed or discuss any aspect of the investigation outside of the context of interviews.

At the start and conclusion of each step in the investigative process, Factfinders will be required to attest to the integrity, accuracy, and completeness of their investigation and all information and evidence collected and provided to OSSE as part of their investigation. Factfinders will sign and date their checklist after completion of each task.

The LEA-led investigation process is premised upon Factfinders conducting the investigation in good faith and with the highest level of professional ethics and personal responsibility. OSSE relies on the integrity and the professionalism of LEA Factfinders to ensure reliable and trustworthy results at the conclusion of the investigation.

See Table 1 for an overview of roles and responsibilities of individuals involved in test integrity investigations.

Table 1. Test Integrity Investigation Roles and Responsibilities

Role	Responsibilities
OSSE	<ul style="list-style-type: none"> • Notify LEA of investigation • Provide initiation form/initial documentation • Review information provided by LEA Factfinders throughout investigation • Make final determination and prepare closeout letter • Issue appropriate sanctions, if determined necessary
LEA Lead Factfinder	<ul style="list-style-type: none"> • Assumes primary responsibility for proper completion of all steps of the investigation • Serves as the primary interviewer of all witnesses

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	<ul style="list-style-type: none"> Must review and approve everything that is entered into the Investigations tab of the Test Integrity Investigations area by the Secondary Factfinder, to ensure its accuracy and completeness
LEA Secondary Factfinder	<ul style="list-style-type: none"> Notetaker during interviews Responsible for the initial entering of investigation information, data, and evidence from the interviews, into the Test Integrity Investigations area May ask follow-up questions of witnesses during interviews, if appropriate
School Test Coordinator	<ul style="list-style-type: none"> Provide requested documentation May participate in an interview conducted by the LEA Factfinders if considered a person in question.
Test Administrator Technology Coordinator Special Populations Coordinator Proctor Student	<ul style="list-style-type: none"> May be asked to participate in an interview conducted by the LEA Factfinders.

Required LEA Factfinder Training

Prior to moving forward with the assigned investigation, both LEA Factfinders will be required to complete a self-paced online training module that provides an introduction and framework for conducting the LEA-level test integrity investigation. Completing the training modules will take approximately one hour and is a prerequisite to starting the school-level investigation. Upon completion of the training modules, the LEA Assessment Manager and the LEA Factfinders must take and pass a corresponding quiz. Once this has been done the LEA will be granted permission by OSSE to start their investigation.

Step 2: Investigation Initiation & Documentation Collection

Investigation Initiation

The investigation will only be initiated after the LEA Factfinders have completed the required training. The *Investigation Initiation* form will be completed by OSSE to initiate an investigation of a school following test administration. Through this form, OSSE will provide the LEA with a detailed explanation as to why the investigation has been requested, as well as relevant information and documentation. LEAs must review this form prior to beginning the school-level investigation. Upon signing into the OSSE Assessment Portal to begin the investigation, LEA Factfinders should carefully review the content entered by OSSE into the *Investigation Initiation* form in the Test Integrity Investigations area, as well as all the documents and data referenced therein and attached as files in their folder. If the LEA Factfinders have any questions, they should consult with OSSE prior to moving to the next step of the investigation.

The status of the form follows the workflow outlined below:

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- **OSSE Initiation:** The initial status of the form while being completed by OSSE. Once the form has been completed, that status will be changed to “LEA Review.” OSSE will notify the LEA Assessment Manager, via email from the OSSE Assessment Portal, that the form has been assigned to them.
- **LEA Review:** The status of the form while being reviewed by the LEA. The LEA will need to review all the supplied information and can make additional inquiries of OSSE using the “Discussion” section.
- **Inquiry Sent to OSSE (if applicable):** The status when the LEA presents questions to OSSE during the investigation process. (Once OSSE sends responses back to the LEA, the status will return to **LEA Review**).
- **Reviewed:** This is the resolved status of the form. Once the LEA has completed a thorough review of the data provided, the form status should be changed to “Reviewed” and saved. This will put the status in a resolved state. The LEA can then move on to the next required step, *Document Collection*.

LEA Collects Documentation from School

OSSE will request specific documentation in the Investigation Initiation form. Any documents requested by OSSE must be provided. LEA Factfinders may request additional documentation from schools as part of the investigation process, if desired.

The *LEA Document Collection* form will be used to track the collection of all required documents while on-site during an investigation. Any documents that are required in accordance with the DC Testing Integrity Act of 2015, including the OSSE-approved School Test Security Plan, and Test Security File must be provided to the LEA Factfinders. Schools must provide required documents prior to the LEA-scheduled visit to any school or site. If any of the required documents are not provided, Factfinders will be required to provide an explanation. OSSE may grant approval to proceed with the investigation if there are missing documents. The LEA cannot move forward with the investigation until OSSE has received the requested documentation or explanation of missing documents and marked Document Collection as completed. Figure 2 Illustrates the workflow for this form.

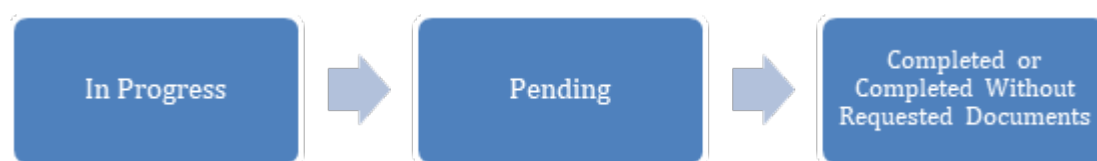


Figure 1 – LEA Document Collection Form workflow

In Progress: This is the initial state of the *LEA Document Collection* form while being completed by the Factfinders. Once all documentation has been collected and reviewed by the LEA Factfinders, the LEA Assessment Manager will notify OSSE, via OSSE.TestIntegrity@dc.gov, that this step has been completed.

Pending: This is the status while OSSE reviews LEA-provided documentation. If any of the requested documents are not provided, the Factfinders will be required to provide an explanation. During this step, OSSE may request additional information from the LEA prior to providing approval to proceed with the investigation.

Completed or Completed Without Requested Documents: This is the resolved status of the *LEA Document Collection* form when all requested documents or explanation of missing documents have been received and reviewed by OSSE. This status will serve to indicate that OSSE has given approval for the LEA to proceed with the interviews, following the O-TIP guidelines. OSSE will notify the LEA Assessment Manager when the status of the document is changed to Completed or Completed Without Requested Documents.

STEP 3: CONDUCTING THE TEST INTEGRITY INTERVIEWS WITH DIGITAL AUDIO RECORDING

LEA Conducts Interviews

The next step in the investigative process is to conduct key staff and student interviews. Interview forms will be provided. The following order of the interviews must be adhered to:

1. School Test Coordinator
2. Special Populations Coordinator
3. Technology Coordinator
4. Student(s), if applicable
5. Proctor, if applicable
6. Test Administrator

The Lead Factfinder will conduct the interview while the Secondary Factfinder will take notes. The Secondary Factfinder may ask follow-up questions. Factfinders are to make digital audio recordings of all interviews with LEA personnel, preserve, and upload a copy of each recording to the Investigations tab of the Test Security Plan in the OSSE Assessment Portal, as part of the investigation file. All parties may be informed of the audio recording. Student interviews are not to be recorded.

1. **School Test Coordinator (STC) Interview:** The STC is the first interview that must be conducted at a school. The purpose of the STC interview is to obtain an overview of how state assessments were planned and managed at the school, including how the school site prepared for the administration, staffing of test administrations, staff training for test administrations, how testing groups were created and assigned to test administrators, security and storage of testing materials, test day procedures and the test administration practices at the specific school. OSSE will provide the form to be used to document the STC interview, which is completed by the Secondary Factfinder.

2. **Special Populations Coordinator Interview (SPC):** The Special Populations Coordinator interview is conducted after interviewing the School Test Coordinator (STC) and prior to student interviews. The primary purpose for this interview is to gain an understanding of how accommodated testing was

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administered at the school site. OSSE will provide the form to be used to document the interview, which is completed by the Secondary Factfinder.

3. **Technology Coordinator Interview (TC):** The Technology Coordinator interview is conducted after interviewing the STC and prior to student interviews. During this interview, LEA Factfinders will need to gather information related to storage and distribution of technology devices used to administer the state assessments. Additionally, any technology-related incidents should be discussed and documented. OSSE will provide the form to be used to document the interview, which is completed by the Secondary Factfinder.

4. **Student Interviews (if applicable):** Once the School Test Coordinator, Special Populations Coordinator, and Technology Coordinator interviews have been completed, LEA Factfinders move on to the interviews with students, as identified by OSSE. ***Student interviews will only occur if deemed necessary for the investigation based on the flags the school received.*** OSSE will provide LEA Factfinders with a list of students from which Factfinders will be required to interview a specific minimum number in order to complete this phase of the investigation. This student information will be shared via the Test Integrity Investigations area to ensure that student-level information is transmitted securely. OSSE will provide a student interview consent form to be shared with parents or guardians of the students identified to participate. Students will be selected for interviews based upon the statistical flags or incident reports for the cohort of students with whom they tested. Student interviews will provide LEA Factfinders with information related to how students were prepared for state assessments, their understanding of the impact of their performance on state assessments (if any), and the experiences that students had prior to, during and immediately after active test administration sessions, including their interactions with test administrators and proctors. The student interview form will be used to guide and document all student interviews and is completed by the Secondary Factfinder. It is imperative that ***all*** student interviews, if required by OSSE, be completed prior to beginning the Proctor or Test Administrator interviews.

5. **Proctor Interviews (if applicable):** Once ***all*** student interviews have been completed, LEA Factfinders can proceed to interviewing all proctors that administered test in the identified testing rooms of students previously interviewed by Factfinders. Proctor interviews will provide details of test day practices and occurrences from the point of view of the proctors. Factfinders will have information from the previous student interviews that will need to be explored with each Proctor. The *Proctor Interview Form* will be used to guide and document all Proctor interviews. The form is completed by the Secondary Factfinder. ***All*** proctor interviews should be completed prior to any Test Administrator interviews.

6. **Test Administrator (TA) Interviews:** All Test Administrator interviews are to be conducted last. LEA Factfinders must conduct interviews of all TAs that administered the test in the identified testing rooms of students previously interviewed by Factfinders. Factfinders will have information from the previous student interviews as well as the Proctor interviews that will need to be explored with each TA. The *Test Administrator Interview Form* will be used to guide and document all Test Administrator interviews. Test Administrator interviews can be challenging interviews to conduct, particularly if LEA Factfinders uncover any evidence of Test Administrator negligence or malfeasance in in the

administration of state assessments. LEA Factfinders need to be well-prepared prior to conducting these interviews.

STEP 4: INVESTIGATION CLOSEOUT

OSSE Review of Documentation

The LEA Assessment Manager will notify OSSE, by selecting the “Send to OSSE” button in the Test Integrity Investigations area, when all documents and forms have been completed and uploaded by the Factfinders. OSSE will review all investigation files in the Test Integrity Investigations area. If, in the course of reviewing documentation submitted by the Factfinders, OSSE should have questions or require additional information, OSSE will communicate that to the LEA Assessment Manager via the Test Integrity Investigations area within **three business days** of receipt. The LEA Assessment Manager should respond promptly to any OSSE questions, requests for clarification or additional evidence.

OSSE Determination

Once all requested documentation has been received from LEAs, OSSE will make a final determination within **15 business days**, based upon its own comprehensive review of the data, information and evidence gathered in each investigation, and all reasonable inferences from the evidence. Each LEA that conducted an investigation will receive a Test Integrity Investigations Closeout letter that provides them with the OSSE determination of their investigation.

These determinations are classified in the following manner:

No Findings

- No evidence of test security violations, wrongdoing, or error.

Minor

- Minor misadministration errors (e.g., incomplete, or missing test documents; inconsistencies in the application of administration procedures).

Moderate

- Moderate misadministration errors (e.g., misinterpretation of requirements in the Test Coordinator/Administrator Manuals not related to test tampering or academic fraud; failure to report certain types of incidents; failure to distribute, collect, or refusal to sign Non-Disclosure Statements).

Significant

- Substantiated isolated test security violations; test tampering or academic fraud (e.g., educator coaching; providing students with answers; allowing student use of calculators or other technology where prohibited)

Critical

- Substantiated systemic test security violations; school- or LEA-led test tampering or academic fraud (e.g., school- or LEA-level coordination of educator coaching or test tampering; school-wide test fraud)

If a finding is determined to be **Significant** or **Critical**, the Test Integrity Investigations Closeout letter will be posted on OSSE's Test Security and Test Integrity webpage.

Possible Sanctions for Test Integrity Violations

If OSSE finds that a violation occurred, OSSE shall evaluate the violation and determine the most appropriate sanction(s) based on severity and precedent, taking into account the following:

1. The seriousness of the violation;
2. The extent of the violation;
3. The role the individual played in the violation;
4. The LEA leadership's involvement;
5. How and when the violation was reported to OSSE; and
6. The action taken by the LEA since the violation was reported to OSSE.

OSSE may issue the following sanctions to an LEA or school when a sanctionable violation is issued against an LEA or school:

1. The payment of any expenses incurred by OSSE as a result of the violation, including the costs associated with developing, in whole or in part, a new assessment;
2. An administrative fine of not more than \$10,000 for each violation; and
3. The invalidation of test scores.

Questions about the test integrity investigations process may be directed to the Office of Assessments at OSSE.TestIntegrity@dc.gov.

Appendix A: School Selection Factors

Selection of Schools for Investigation

OSSE selects schools for investigation based upon a number of factors related to statewide academic assessment administration. These include statistical analysis conducted by the assessment vendor, test security incident reports submitted during the test administration, administration practices (school test security plan submissions, test materials issues, auditor observation reports), and anonymous tips related to test security practices received during or after administration. Schools identified for investigations may be selected based upon anomalies identified related to any of these factors.

For all schools selected for investigation based upon statistical anomalies in the test response data, OSSE will provide the LEA with the actual results of the statistical analyses along with detailed explanations of the statistics used for flagging.

Data Forensics Analyses

Response Change Analysis

Response change analysis looks at how often student answers are changed, focusing specifically on an excessive number of wrong answers changed to right answers. In traditional paper-based, multiple-choice testing programs, this is sometimes referred to as “erasure analysis.” For computer-based tests, only each student’s **final response** to an item is compared to the student’s initial response. Only response changes resulting in **points gained** are considered when flagging districts/schools/administrators in the response change analysis.

Aberrant Response Pattern Detection

Aberrant response pattern detection analysis looks at the unusualness of student responses compared with what would be expected. Most simply, this can be thought of as quantifying the extent to which higher-scoring students miss easy questions and lower-scoring students answer difficult questions correctly. While it would be difficult to draw a definitive inference about a single student flagged as having an aberrant response pattern, a cluster of students with aberrant response patterns within a classroom or school might warrant further investigation.

Results from the aberrant response pattern detection analysis will be reported at the district and school levels.

Test Security Incident Reports Submitted During the Test Administration

Test security incidents that occur during test administration must be reported promptly to OSSE. Examples of test security incidents include: failure to adhere to administration instructions; students and/or staff take actions that could constitute cheating/coaching, a technical issue causes students to not complete an active testing session before the close of a school day, and accommodations

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misadministration. The content of test security incident reports may be a factor in OSSE's decision to initiate an investigation.

Other Administration Practices

Other administration practices that factor into OSSE's decision to initiate an investigation include school test security plan submissions, test materials issues, and OSSE assessment auditor observation reports.

Anonymous Tips

Any potential breaches to test security and integrity during or after administration that are reported anonymously via the OSSE Hotline at 202-304-3269 or online incident reporting form may be a factor in OSSE's decision to initiate an investigation.