



Texas Education Agency

Recommendations for
Implementation of
14-point Test Security Plan

Recommendation #1

TEA will analyze scrambled blocks of test questions to detect answer copying.

Rationale:

Given the blueprint used for constructing the Texas Assessment of Knowledge and Skills (TAKS) tests, it is possible to shift field test item positions from one year to the next so that students and test administrators are not aware of which items differ across the various forms of a given test. For example, as many as 40 forms of the grade 6 TAKS test might be developed in any given year, with the only difference between the forms being the embedded field-test items. If students are copying answers directly from another student's answer document, it is highly unlikely that the students will all have identical forms of the test, given the way in which the forms are "spiraled" within classrooms. By analyzing student responses on the base (i.e., identical) items with those on the field-test items, it is possible to detect differences in performance that could be indicative of cheating.

Timeline:

The field test item positions on TAKS tests were modified for the spring 2008 administrations. Information regarding the field test item positions is secure and will remain so for all future administrations. A pilot analysis of scrambled blocks, to identify statistically irregular patterns of test answers that may indicate cheating, was conducted on answer documents from spring 2008 and 2009, and no irregular patterns were detected. TEA included in the Administrator's Statement of its Legislative Appropriations Request for Fiscal Years 2010 and 2011, for legislative consideration, the cost to scramble test items for the planned end-of-course testing program.

Recommendation #2

TEA will assign independent test monitors to campuses based on evidence of testing irregularities and make unannounced visits to additional campuses on test days.

Rationale:

Monitoring of test administrations has always been a requirement of the state assessment program, and the expectation has been that district and campus staff will be responsible

for test monitoring activities. Although local monitoring efforts have identified incidents of cheating over the years, the assignment of a state presence on campuses during major test administrations did not occur until the 2006 test administration. State assignment of test monitors increased during 2007, 2008, and 2009 testing. In 2008 the first unannounced visits to campuses during testing occurred and continued in 2009. The presence of independent monitors on campuses during the administration of state assessments is a strong deterrent to cheating.

Timeline:

The Texas Education Agency identified some campuses/districts where independent test monitors were required during 2008 and 2009 testing as a result of either investigations completed by the Office of the Inspector General (OIG) and/or recommendations of the Monitoring, Investigations, Interventions, and Sanctions Steering Committee.

Assessment staff continue to coordinate with the Office of Complaints Management, Test Monitoring, and Inspector General Investigations, as well as with the Division of Program Monitoring and Interventions to identify campuses where 2010 testing will be monitored and/or where unannounced visits to additional campuses on test days will occur. Identification will be based on information from previous testing such as incident reports of test security violations, erasure analyses, student assessment data validation through performance-based monitoring, findings from previous on-site visits to campuses/districts, and the multi-year *Academically Unacceptable* status of campuses/districts. In addition, a random sample of remaining campuses will be selected for monitoring visits.

Recommendation #3

TEA will require districts to implement seating charts for use during all state assessment administrations.

Rationale:

Although statistical analyses might indicate similar patterns of responses on answer documents, it is not always possible to determine conclusively that the similarities are the result of cheating. By requiring the use of seating charts, it will be possible to identify where students were seated during test administrations, thus providing evidence of a greater likelihood of cheating if the students with similar patterns of responses were in close proximity during testing. The seating charts will also identify the test administrator(s), providing a readily accessible link between students and test administrators at the local level.

Timeline:

Seating charts were required beginning with the spring 2008 TAKS administrations. Districts are required to maintain the seating charts locally for five years. This requirement was incorporated into the *District and Campus Coordinator Manual* that is published each year. Sample forms to use for recording seating and test administrator

information were posted to the TEA website, and additional information was included in the annually updated *Test Security Supplement*. Both documents are used as the basis for training of school district staff responsible for test administration.

Recommendation #4

TEA will develop a transparent method to annually identify statistically irregular patterns of test answers that may indicate cheating to augment other detection methods already in use.

Rationale:

Any statistical methods employed by TEA to identify campuses for further investigation of cheating should be transparent and replicable at the local level. The methods employed should minimize “false positives” to the extent possible so that campuses are not incorrectly identified as cheating on state assessments and resources can be directed to campuses/districts where cheating is more likely to have occurred.

Timeline:

TEA staff began the process of identifying companies and individuals with the expertise to assist TEA in the development of these types of analyses, as well as surveying the literature for information that would be helpful in designing a system for conducting the desired analyses, through the issuance of an RFP in March 2008. Only one proposal was received in response to this RFP and it was not responsive to the RFP requirements. TEA included in the RFP for the 2010-2015 assessment program contract the requirement that these analyses be conducted by the selected vendor.

Recommendation #5

TEA will contract with a national expert for independent review and advice on statistical cheating detection.

Rationale:

Although test security has always been a critical element of the state assessment program, the procedures that have been developed over the years have not been reviewed by national experts outside of the state’s Technical Advisory Committee. An independent review would provide new insight into the state’s current procedures, help ensure that methods employed to detect cheating reflect the most current research, and provide desirable independent review of the methods and procedures employed.

Timeline:

After the statistical methods for detecting possible cheating required by Recommendation #4 are determined, the recommended analyses and procedures will be independently reviewed by a national expert.

Recommendation #6

TEA will require school districts to provide information that links test administrators to students.

Rationale:

See Recommendation #3. Information linking test administrators to students was available locally on required seating charts beginning with the spring 2008 test administrations. School districts are required to provide this information to TEA upon request.

Timeline:

In 2008, TEA worked with contractor staff to develop a proposal for collecting data that would link test administrators to students. A focus group consisting of district testing coordinators from across the state was convened. It was the consensus of the group that collecting linking data electronically on student answer documents would be burdensome for campus staff, and would not address the issue of which test administrator(s) to hold accountable for any anomalies identified in situations where more than one test administrator is connected to a given test session. The focus group recommended the use of seating charts (Recommendation #3 above) as the best means for capturing this information. Coordinators also suggested that TEA could randomly select campuses/districts to audit for compliance with the seating chart requirement. TEA's monitoring plan described in Recommendation #2 includes randomly selecting a group of campuses for monitoring visits. During these visits, monitors review all seating chart documentation to verify compliance with the requirements specified in the *District and Campus Coordinator Manual*.

Recommendation #7

TEA will require students in certain grades to sign a grade-appropriate pledge of honor immediately prior to taking a state assessment, just as all test administrators are required to sign a security oath prior to each administration.

Rationale:

There is evidence in the literature that honor codes and pledges are successful deterrents to student cheating.

Timeline:

Beginning with the spring 2008 TAKS administrations students taking TAKS in grades 9, 10, and exit level were asked to sign an honor statement, printed on their answer documents, immediately prior to taking an assessment. Limited information concerning this requirement was included in the *District and Campus Coordinator Manual* that is published each year. More detailed information, including specific explanations and instructions concerning the honor statement, is provided to test administrators in the *Test*

Security Supplement. The 2010 version of this supplement was published in November 2009. Both documents are used as the basis for training of school district staff responsible for test administration. Beginning in spring 2009, students taking TAKS–Modified in grades 9, 10, and 11 were also asked to sign the honor statement.

Recommendation #8

TEA will add to the list of sanctions for cheating, lowering a school district's accreditation rating.

Rationale:

Currently the primary means of addressing cheating are to invalidate scores if students cheat on the state assessments or refer individual educators to the Educator Certification and Standards Division for possible sanctioning. Lowering accreditation ratings would permit sanctioning districts in the event of systemic cheating.

Timeline:

Rules adopted in 19 TAC Chapter 97, Planning and Accreditation, Subchapter EE, Accreditation Status, Standards, and Sanctions in November 2007 permit the assignment of an *Accredited Warned*, *Accredited-Probation*, or *Accredited-Revoked* status if the district has failed to comply with requirements related to the integrity of assessment data used to measure performance under TEC Chapter 39..

Recommendation #9

TEA will provide additional information in test administration manuals related to consequences for educators and students if cheating occurs.

Rationale:

The *District and Campus Coordinator Manual*, the *Test Security Supplement*, and the *General Test Administrator Manual* for the state assessment program are the primary means for communicating information related to test security and the consequences of violating state policies.

Timeline:

Beginning with the spring 2008 TAKS test administrator manuals, additional information was provided about the consequences for educators and students if cheating occurs. This additional information also has been incorporated into the 2009 and 2010 TAKS test administrator manuals. These manuals are used for training school district staff responsible for test administration.

Recommendation #10

TEA will require school districts to report to TEA any investigatory and disciplinary actions taken against educators and students locally.

Rationale:

Although districts are required to report testing irregularities to the Student Assessment Division, they were not previously required to provide information in all cases about any actions taken locally as a result of their investigations. The collection of this information would provide a source of data concerning actions taken at the local level and evidence that local actions were taken to address testing violations.

Timeline:

Beginning with the spring 2008 administrations, districts were required to report disciplinary actions taken locally against educators using the already existing Corrective Action Plan document. Districts were also required to report any disciplinary actions taken locally against students who were determined to have cheated on a state assessment beginning in spring 2008. The Student Assessment Division developed the *Locally Determined Disciplinary Action Form* for reporting this information. Language regarding each of these reporting requirements was provided in the *Test Security Supplement* beginning with the 2008 edition. The 2010 supplement was published in November 2009 and will be used for training of school district staff responsible for test administrations in 2010.

Recommendation #11

TEA will require school districts to maintain test security materials, signed security oaths, and seating charts for five years following a test administration.

Rationale:

Districts have been required to maintain test security materials locally for one year. If investigations of cheating involve prior administrations, it has not always been possible to collect documentation to support the investigations.

Timeline:

Beginning with the spring 2008 TAKS administrations, districts were required to maintain test security materials for five years, in accordance with the rule 19 TAC Chapter 101, Assessment, Subchapter CC, Required Test Administration Procedures and Training Activities to Ensure Validity, Reliability, and Security of Assessments adopted in February 2008. Beginning in 2008, information concerning this requirement was included in the annual publication of the *District and Campus Coordinator Manual*. Additional information was provided in the *Test Security Supplement* in 2008, 2009, and 2010. The *2010 Test Security Supplement* was published in November 2009, and will be used for training school district staff responsible for test administration in 2010.

Recommendation #12

TEA will develop a model policy on test integrity and test security procedures for adoption by local school boards.

Rationale:

Procedures to help ensure test security and confidentiality are spelled out in the *District and Campus Coordinator Manual* that is produced annually for the state assessment program. All individuals involved in the administrations of the state assessments are required to sign oaths indicating they understand test security and confidentiality requirements. By providing a model policy to local school boards for their review and consideration, there is an expectation that districts would be more cognizant of state test security requirements for district personnel.

Timeline:

TEA convened a focus group of district testing coordinators from across the state to assist in the development of a model policy. A draft of the policy was provided to the Texas Association of School Boards (TASB) for review. The final version of the model policy, to be considered for possible local adoption, was incorporated into the *Test Security Supplement*, beginning in 2009.

Recommendation #13

TEA will ensure that state investigations, sanctions, and corrective actions are conducted in a fair, expeditious, and equitable manner.

Rationale:

To be truly effective, investigations of testing irregularities need to be conducted as quickly and thoroughly as possible. Given student and staff mobility, it is critical that investigations are completed as close to the test administration in question as possible.

Timeline:

In fall 2007, Student Assessment staff assisted the Office of the Inspector General and the Office of the General Counsel in drafting procedures for conducting investigations, first implemented in spring 2008. Student Assessment staff also reviewed drafts of the *Test Monitor Procedure Manual* and the *Test Monitoring Program Operating Guidelines* and provided input to the Office of Complaints Management, Test Monitoring, and Inspector General Investigations. These documents will be used for spring 2010 monitoring activities.

Recommendation #14

TEA will require test administrators to participate in a standardized online training program that addresses mandatory test security procedures.

Rationale:

All test administrators are required to be trained prior to each major state assessment. Topics to be covered in training are outlined in the *District and Campus Coordinator Manual* that is produced annually for the state assessment program. However, implementation of this training is handled at the local level, and the quality and extensiveness of the training received by test administrators varies widely across districts. To ensure that all test administrators receive similar training and that all critical elements are covered in the training, standardized training modules should be developed by TEA that can be delivered online.

Timeline:

Three Web-based test administrator training modules were developed in 2009 and made available to districts in January 2010. The online training is optional but strongly recommended and is designed to supplement the mandatory training required of all personnel involved in testing. The three modules currently available are (1) *Active Monitoring*, (2) *Distribution of Test Materials*, and (3) *Proper Handling of Secure Materials*.