Michigan Department of Education

CREATING A RESOURCE FOR STATE ASSESSMENT TEST SECURITY POLICIES AND PROCEDURES
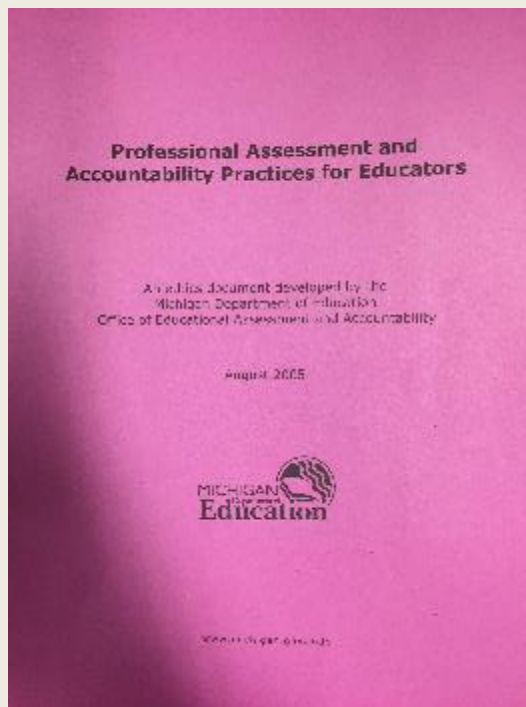
CONFERENCE ON TEST SECURITY 2018

JESSICA FENBY- TEST SECURITY SPECIALIST
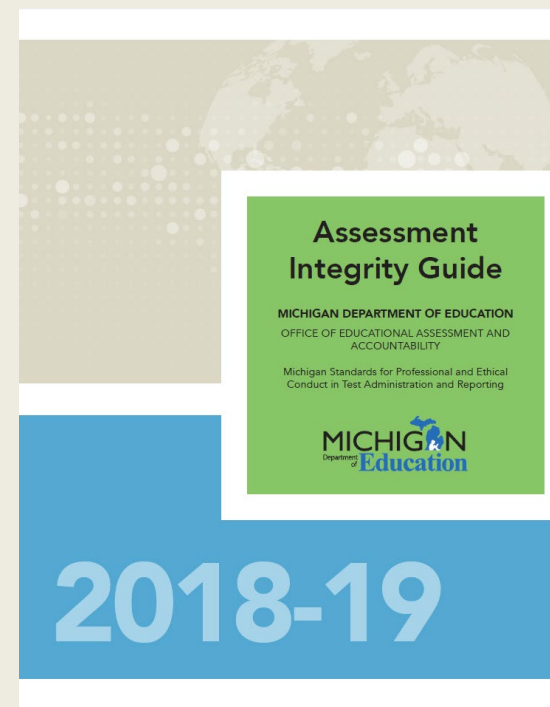
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Michigan Department of Education Assessment Integrity Guide

Document created by the MDE for the purpose of communicating professional and ethical test administration and reporting practices for school staff and students.

THEN

NOW

Professional Assessment and Accountability Practices for Educators

A practice document developed by the Michigan Department of Education Office of Educational Assessment and Accountability

August 2005

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Assessment Integrity Guide

MICHIGAN DEPARTMENT OF EDUCATION

OFFICE OF EDUCATIONAL ASSESSMENT AND ACCOUNTABILITY

Michigan Standards for Professional and Ethical Conduct in Test Administration and Reporting

MICHIGAN Department of Education

2018-19

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Past

2004-2005

2005-2015

2015-2016

2016-17

Originated due to needed guidance for school staff to provide specific detail in proper and ethical test administration and student conduct.

Document evolved as MDE learned what areas were missing or needing refinement.

Updated to account for online testing.

Updated to account for Security Audit. Online training modules available.

Professional Assessment and Accountability Practices for Educators

2004-2005

- Roles and Responsibilities
- Assessment Security
- Assessment Preparation
- Assessment Administration
- Student Unethical Practices
- Determining Irregularities and Unethical Practices
- Data Reporting Practices
- Independent Investigation and Review
- Glossary
- Handouts

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Assessment Integrity Guide

2009

- Original structure
- Changes Included:
  - Emergency Form
  - Self-Investigation
  - Undue Stress
  - Unethical-Prohibited Behavior/Academic Fraud
  - Training Requirements
  - Determining Irregularities and Unethical Practices changed to Determining and Resolving Administration Irregularities
    - Includes addition of data forensic analyses of test results

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Assessment Integrity Guide

2016-17

- Updated to reflect online testing
- Incorporated feedback from Caveon review and Test Security Audit
  - Best practices in test security
  - Data forensic analyses updates
- Organized around Prevention, Detection, Investigation, and Remediation (PDIR) with a heavy emphasis on Prevention
- Online Training Modules developed to be used to accompany the Assessment Integrity Guide

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Online Assessment Security Training Modules

MDE partnered with Michigan Virtual University to create a training course on Assessment Security.

The course is made up of four modules that provide supplemental training on assessment administration security practices.

To date the 2018 course has had 2,700 enrollees with 1,900 of them completing the course.

Module 1: An Introduction to Test Security and Planning
This module covers why test security is important.

Module 2: Getting Ready for Testing
This module covers steps to take before testing, such as staff training and preparing the testing environment. These steps will help you avoid common security problems, protecting both your staff and the validity of your test results.
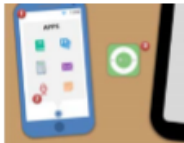
Module 3: Test Administration
This module covers security concerns and considerations during testing. What should test administrators do on-site? What student behaviors should you watch for?

Module 4: Incident Response
This modules covers what to do if something goes wrong. Most problems can be prevented with preparation and monitoring, and most can be mitigated with a quick and careful response.

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Present

2018-19

Review
- Includes all assessments and consistent policy where able
- Included test administration teams for consistency and clarification
- Based on feedback from field

Policy Updates
- Qualifications for assessment coordinators and administrators
- Testing schedule requirement updates
- Based on feedback from field

Usability
- Organizational and formatting changes
- Based on feedback from field

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2018-19 Assessment Integrity Guide

Assessment Integrity Guide

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Office of Educational Assessment and Accountability

ASSESSMENT INTEGRITY GUIDE

Training

All District Assessment Coordinators, Building Assessment Coordinators, Test Administrators, Proctors, and other staff who participate in a state assessment or handle secure assessment material must:

- be fully trained in the administration policies and procedures for the assessment being administered; specific requirements about training can be found in each assessment-specific Test Administration Manual
- sign an OEAA Assessment Security Compliance Form (provided with assessment materials before each testing window)

The District Assessment Coordinator must be well prepared; is responsible for providing clear and comprehensive annual training on test administration, security and procedures; and must comply with state assessment requirements.

At a minimum, training should incorporate a thorough review of the following:

- this *Assessment Integrity Guide*
- materials found in Professional Development section of all the assessment web pages and Test Administration Manuals for the assessments being administered
- specific instructions as communicated in newsletters or direct communications from the MDE
- the MDE Assessment Security online course through Michigan Virtual University at http://bit.ly/ MDEAssessmentSecurity.

For WIDA assessments, there are specific online training courses, available through the educator's wida.us Secure Portal account; successful completion of the courses results in the receipt of a Certificate, which should be kept on file at the district level. Depending on the WIDA assessment or part of the test, the Certificate may need to be updated annually.

In some cases (e.g., some Michigan Merit Exam components and WIDA), certain state-mandated assessments may dictate a differing training policy. In such cases, the differing test administration training policy overrides the training policy found in the *Assessment Integrity Guide.*

Each district should document all training and test administration processes and keep copies of all assessment training materials, including presentations, handouts, and sign-in sheets. If a school experiences an irregularity, the state may ask for these materials to ensure that the training was appropriate and adequate.

Identification of Testing Personnel

The District Superintendent has the ultimate responsibility for testing within the schools. The Superintendent must identify an individual to act as each assessment's District Assessment Coordinator. For example, the staff member responsible for coordinating M-STEP should be identified as the "M-STEP Assessment Coordinator". These designations should be updated on an annual basis in the Educational Entity Master (EEM).

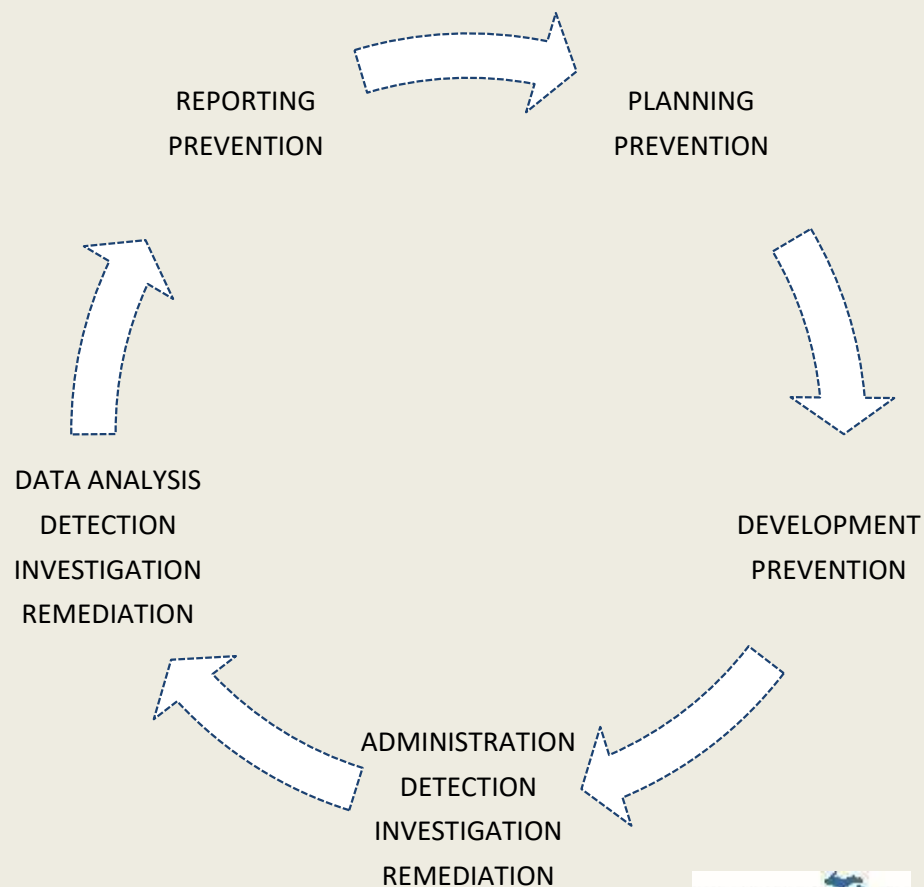The Educational Entity Master (EEM) is a repository that contains basic contact information for public and nonpublic schools, intermediate and local school districts, and institutions of higher education. Because the EEM serves as the directory for identifying and linking educational entities with other data collection applications, it is imperative that districts and schools keep their information up to

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Assessment Cycle

Assessment security practices occur throughout the entire assessment cycle.

The majority of the emphasis in assessment security practices are focused on the prevention of irregularities. Prevention practices occur during planning, development, and reporting.

Detection, investigation, and remediation of assessment security practices occur during the administration and data analysis sections of the assessment cycle.

REPORTING
PREVENTION

PLANNING
PREVENTION

DEVELOPMENT
PREVENTION

DATA ANALYSIS
DETECTION
INVESTIGATION
REMEDIATION

ADMINISTRATION
DETECTION
INVESTIGATION
REMEDIATION

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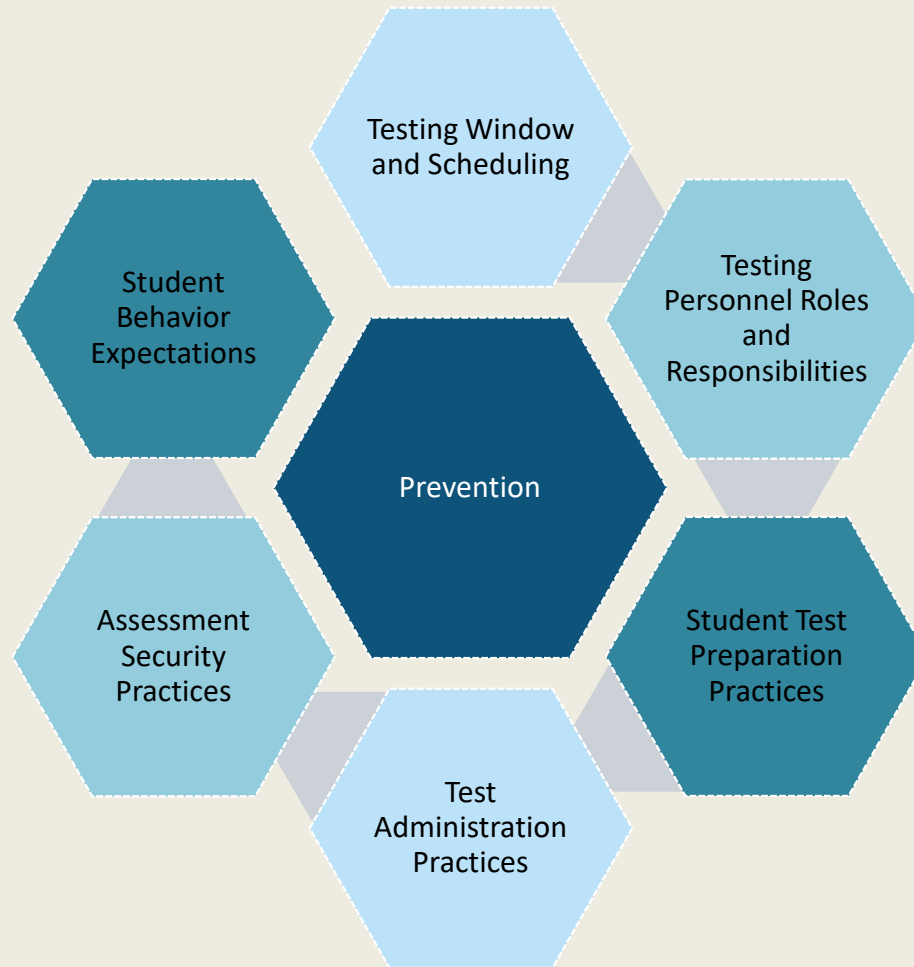
Section 1: Prevention

Section 1: Prevention

Test Administration

Testing Schedule

It is the Building Coordinator's responsibility to develop test administration schedules based on the school's resources (i.e., staffing, available computers, testing rooms, etc.) and needs, ensuring the overall integrity of the assessment process. Testing schedules must follow the test administration windows as established by the OEAA. These windows help reduce the overall footprint that testing has in schools while providing schools with flexibility to successfully administer the tests. Certain assessments (i.e., PSAT 8/9, PSAT 10, ACT WorkKeys, SAT with Essay, and paper/pencil forms of the M-STEP assessment) require test administration to occur on specific dates and times as outlined in the Testing Schedule for Summative Assessments. For additional information on these dates refer to the Testing Schedule for Summative Assessments. (https://www.michigan.gov/documents/mde/Testing_Schedule_2019_624387_7.pdf)

All makeup testing must be completed during the student's designated test window (based on his/her grade and test mode).

MI-Access test scheduling should take into consideration the unique needs of the students. MI-Access tests are designed for administration in small groups or one-on-one settings with multiple administrators. Since the testing environment for these students may be unpredictable, the MDE has allowed broad flexibility to schools in determining their own schedules within the seven-week window to complete all the content areas of testing.

Documentation of testing schedules for M-STEP, MI-Access, and WIDA ACCESS for ELLs must include the following information:

- district name
- building name
- building coordinator's name

- date of assessment administration
- location of testing session(s) (i.e., room number, classroom, etc.)
- starting and ending time of testing session
- assessment/grade/content being administered for each testing session
- test administrator(s) and proctor(s) for each testing session

Testing schedules must be retained by the district or school for three years. The OEAA may request a copy of a building's testing schedule for monitoring and irregularity investigation purposes.

In some cases, certain state-mandated assessments may dictate a differing policy that applies to testing schedule planning and documentation. In such cases, the differing policy overrides the policy found in the *Assessment Integrity Guide*.

Off-Site Testing

Any time students test in a place other than where they receive their instruction, an Off-Site Test Administration Request must be submitted to the OEAA. You can find the Off-Site Test Administration Request Form on each assessment's web page.

Once the request is granted, the school must ensure the security of the assessment during all phases of testing. The test tickets, test booklets, answer documents, and scratch paper should be securely transported to and from the remote location.

Seating Charts

Seating charts are not required for the M-STEP, MI-Access, and WIDA assessments.

In some cases, certain state-mandated assessments (e.g., some Michigan Merit Exam components) may dictate a differing seating chart policy. For example, some assessments may require that a seating chart be used. In such cases, the differing policy overrides the seating chart policy found in the *Assessment Integrity Guide*.

- gather all assessment training materials (e.g., sign-in sheets, presentation materials)
- collect testing schedules
- confirm that schools have properly completed and collected all inventory and shipping records (including school packing lists and documents used to track the transfer of secure materials within the schools)

Assessment Security & Test Administration Practices

The purpose of state assessments is to measure student achievement in a standardized environment. In order to preserve unbiased measures of student performance, the students should have no prior exposure to the test items. A breach of the security of these tests could result in invalid district, school, classroom, or student scores. Breaches can be local and result in retesting fees for a district; breaches also have the potential to invalidate an entire state test administration and potentially cost the state hundreds of thousands of dollars. It is critical that all staff who handle student assessment materials protect the test from exposure at all times.

Professional Assessment Security Practices

Whether a P/P, CAT, or CBT test administration is employed, sound planning plays a key role in ensuring the security and validity of assessments. This includes proper handling of test materials and successful return of all materials. District Assessment Coordinators are encouraged to confirm that all schools are meeting security requirements. The importance of maintaining assessment security at all times must be stressed. Ethical practices ensure validity of the assessment results. The following are professional assessment security practices that all school personnel must follow.

- All assessment materials must be kept in a locked storage area that is only accessible to the Building Assessment Coordinator and designates. This includes immediately before

and after testing. Supervise materials closely. Secure materials include, but are not limited to, the following items:

- test booklets
- test tickets
- listening scripts
- accommodated materials
- used answer documents
- scratch/graph paper
- MI-Access student picture cards
- MI-Access P/SI scoring documents

- Restrict access to the storage area to authorized personnel only and ensure the assessment materials remain secure at all times.
- Inform all personnel involved in test administration of the importance of maintaining strict assessment security and of the potential implications of assessment security breaches.
- Determine and document which staffers are responsible for maintaining a chain of custody over assessment materials and limit access to those directly involved with each of the assessments.
- Distribute and collect secure test materials to/ from students individually.
- Account for all assessment materials, including test tickets, before, during, and after each test session.
- Ensure that students testing online do not access unauthorized computer applications, including the use of the internet, during the test.
- Disallow student access to online tests at prohibited times (e.g., weekends, holidays, hours outside of the instructional day, etc.).
- Refrain from examining or discussing actual test items or test responses with anyone.
- Ensure that students who are required to use supports and accommodations on the tests are receiving them.

Section 2: Detection of Irregularities

Gives direction and expectation of district and school reporting of misadministration and student prohibited behavior.

Explanation of forensic analyses used on assessment results.

Explains MDE assessment monitoring practices.

Incident Reporting

Detection

Data Forensic Analyses

Monitoring

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Section 2: Detection of Irregularities

Section 2 – Detection of Irregularities

The focus of this section is on procedures for monitoring and detecting testing irregularities and maintaining the integrity of the state assessment. Two important considerations for districts and schools are:

- having your plans for monitoring the integrity of the assessment before, during, and after all test administrations
- contacting the OEAA immediately if an irregularity is suspected

Reporting Irregularities

Despite how well-prepared testing personnel may be, the possibility that mistakes will be made exists. When mistakes occur, it is important to have procedures in place to help ensure that all the necessary information is gathered, so the district can make a clear determination about what has occurred, when, and to whom. Some irregularities can be remediated without significant consequences if caught and corrected in a timely fashion. Self-reporting also reduces the suspicion or appearance of academic fraud.

If any M-STEP, MI-Access, or WIDA testing irregularities occur before, during, or after testing, the District Assessment Coordinator must report them to the OEAA as soon as possible through the OEAA Secure Site Incident Reporting tool (www.michiga .gov/oeaa-secure) For detailed information on how to access and use the Secure Site Incident Reporting tool see the Incident Reporting guidance (http://www.michigan.gov/documents.mde/Incident_Reporting_520328_7.pdf). For reports of security or data breaches involving SAT and PSAT, School Day Support with College Board should also be called immediately. Reports of security or data breaches involving ACT WorkKeys should also be reported to ACT immediately.

The school may choose to begin its own self-investigation. If this is done, the school should report the findings to the OEAA. Many incidents can be resolved without any further actions. If the school finds no issue or is able to remedy the issue, then the case may be determined to be resolved by the OEAA.

When the District Assessment Coordinator contacts the OEAA for guidance in handling a disruption, being prepared to answer the following questions will help the OEAA make a determination about the situation.

- What happened and where did the irregularity take place?
- When did the irregularity happen?
- How many students are affected and are they being monitored while the situation is being investigated?
- Who was present in the test administration, who was in charge, and who was proctoring?
- What staff are witnesses?
- What grade and subject tests were affected?
- What test or test booklets are involved?
- How much of the test has been completed -- are the students still testing or have they completed the test?

Allegations

The OEAA has a telephone tip line (877-560-8378 option 1) that provides a way for unusual or suspected improper activities to be reported. Allegations from witnesses will be logged and OEAA staff will do an initial interview with the witnesses (also known as fact-finding) to determine the severity of the violation and collect any relevant details regarding the irregularity. This information is then sent with recommendations for an OEAA Determination Review.

Allegations from anonymous witnesses will go through the same steps for information collection; however, this is significantly more difficult, since the OEAA will not be able to follow up to determine the creditability or severity of the irregularity. Some anonymous complaints may not contain enough information for action to proceed. If there is no actionable information, the irregularity will be logged, and no further actions

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- Ensure that all test administration documents (i.e., OEAA Secure Compliance Forms, inventory and shipping records, prohibited behavior documentation, and Missing Test Materials Reporting Forms) have been gathered.

OEAA Assessment Monitoring

For the OEAA, identifying and investigating potential test irregularities involves a variety of data sources. These include self-reports of test irregularities, allegations/complaints, results of analyses, and reports designed to identify irregularities.

The OEAA will monitor assessment activity at districts and in schools for evidence of test fraud, security breaches, and theft and distribution of test content, either directly or indirectly. In identifying and investigating irregularities, there are three overriding questions:

- Did the irregularity lead to a breach of test item(s) security?
- Did a misadministration affect the validity of any student performance and resulting scores?
- Was the irregularity deliberate--is there evidence of academic fraud?

Note: The OEAA staff or contracted observers may directly observe test administration activities or monitor online test anomalies without advanced notice.

OEAA Targeted and Random Assessment Monitoring

The OEAA has internal and independent assessment monitors who conduct visits to schools during each testing window. The assessment monitors follow procedures developed to assure the security and confidentiality of state assessments and that all testing personnel are adhering to proper procedures. A school can be monitored during a test administration if they were selected either for Targeted Assessment Monitoring or for Random Assessment Monitoring.

Schools selected for targeted or random assessment monitoring will receive an email from the OEAA requesting a copy of their testing schedule. Testing schedules must be submitted as requested. Monitoring will occur via observation on an unannounced day and time of the OEAA's choosing.

Targeted Assessment Monitoring

Schools that have had a previous irregularity or that show unusual results from previous state assessment data analyses may be placed on a list for monitoring from year-to-year or for a period of years. The OEAA will assign assessment monitors to observe any or all facets of testing coordination, test administration, and reporting. Results will be reported to the OEAA for review.

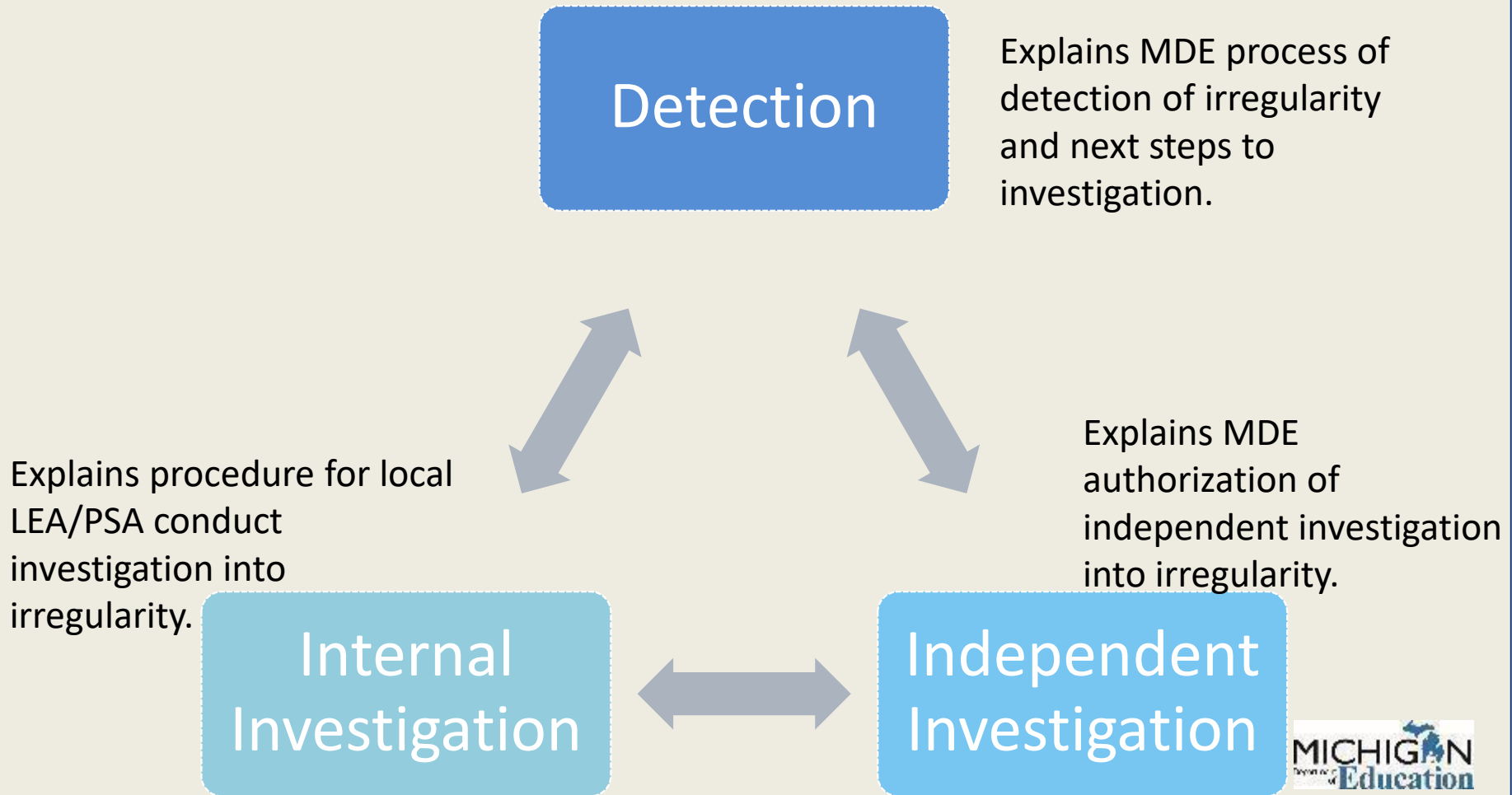#### Random Assessment Monitoring

For quality and integrity assurance purposes, a sample of schools is randomly selected for monitoring. These locations are chosen to ensure regional representation with randomly selected schools within each region.

OEAA Targeted and Random Assessment Monitoring Procedures

During any day of testing, an assessment monitor may present themselves to the front office of the school at the beginning of the school day. These assessment monitors will deliver a signed letter, on MDE letterhead (College Board and

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Section 3: Follow-Up Investigations

Detection

Explains MDE process of detection of irregularity and next steps to investigation.

Explains procedure for local LEA/PSA conduct investigation into irregularity.

Internal Investigation

Explains MDE authorization of independent investigation into irregularity.

Independent Investigation

Section 3: Follow-Up Investigations

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- remind the community that various factors affect test performance, and that factors including, but not limited to, the following need be taken into consideration when analyzing test results: cultural background, health conditions, economic status, and former educational experiences

School personnel will not:

- expose any personally identifiable information to anyone other than the student or parents/legal guardian or designated school personnel (the law requires the protection of student information)
- report on subgroups of students that would lead to inadvertent identification of individual students; state assessment results are reported for sub-group sizes of ten or more students, as reporting of smaller group sizes may inadvertently expose student identities
- include names, student ID numbers, birthdates, gender designations, or race designations that may appear on reports on any public information (student names may be used on recognized achievement awards)
- falsify student records to alter the accuracy of reported results
- misuse or misrepresent the meaning and interpretation of any student scores

Section 3 - Follow-Up Investigations

Internal Investigation

Following a reported incident or complaint, the OEAA may determine that questions still remain regarding the security, validity, or authenticity of the test administration, and require the District Assessment Coordinator (or designee) to complete an internal investigation and file a self-report with the OEAA. When notified of these occurrences, the District Assessment Coordinator should evaluate the circumstances and determine whether any student or adult testing staff bears responsibility for what occurred. If the district determines that no error was committed by a student or an adult, the district should include all evidence of the school's conclusion of the irregularity in the internal investigation report. The more thorough the internal investigation and self-reporting is, the more likely the OEAA and the school can come to some determination of an irregularity and the required remediation.

Each internal investigation report should include the following information:

- a timeline and summary of events
- information on the ways students were impacted by any irregularity during test administration
- all seating charts of affected rooms
- a list of school staff involved
- a list of all Unique Identification Codes (UICs) and test sessions of students involved

- statements from school staff involved, summarizing what occurred in their own words
- statements from involved students (uncoached), if possible and appropriate
- copies of security compliance forms for involved school staff
- a copy of the district's assessment training plan
- a copy of the district's plan to address and prevent the occurrence of any irregularities.

Independent Investigation

Following a reported incident or complaint, the OEAA may determine that an investigation of widespread testing anomalies, or of one that is highly suggestive of inappropriate behavior by educators, students, or others, is warranted. The State Board of Education authorizes the OEAA Director to call for an on-site evaluation or investigation of a school district at any time. The OEAA will bring in experts from outside the school district and independent of the MDE. Background checks, credentials, and relevant experience of the independent investigators are validated by the OEAA.

An assigned investigator or a team of investigators will be tasked with conducting a fact-finding investigation to gather evidence documenting the conditions of the alleged complaint or irregularity. The investigator(s) may arrive in the district without prior notification and will inform the superintendent of the purpose of the fact-finding and of the procedures to be followed. The OEAA asks that the district and school give full cooperation to the investigator(s). During their investigation, they may request copies of email correspondence, memos, flyers, or other communications relevant to the test administration. They may also request to interview some of the school staff and/or students. The investigator's role is strictly to identify any relevant facts and to send a report to the OEAA Determination Team.

Expertise of Investigators

When the state must investigate assessment security incidents, it may use a number of different types of relevant expertise to carry out the investigations. For example, the OEAA may include investigators on its team who are experts in:

- educational measurement and psychometrics
- legal domains such as intellectual property, criminal law, contracts, etc.
- forensic data analysis
- investigative and interviewing skills

The MDE will also have experts in a variety of areas to provide input on an investigation and to be involved in planning, conducting the work, and reviewing the findings.

Section 4 – Remediation

Remediation of testing irregularities can differ based on the severity of a confirmed allegation or misadministration. There are limited options for the OEAA to resolve these irregularities after the testing window is over, but the goal of the OEAA is to ensure valid test scores, and to ensure all students have an equal opportunity to show their knowledge, skills, and abilities through their engagement with the test. It is important to remember that many irregularities can be corrected if they are detected and attended to during the test administration window.

Under current state law, MDE does not intervene in district personnel matters regarding misadministration or cheating. It is expected that the local school district will handle any further reprimands, sanctions, or tenure matters according to local district policies.

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Section 4: Remediation

Determination

Recommendation

Review/Appeal

Action

Section 4: Remediation

Future

- Continue to remove bulk and jargon

- Enhance documentation and reference to all of the State's assessments-consistent with TAMs

- Add appendix items for templates of investigation summary, training plans, chain of custody, testing schedules

- Add additional information on data forensic analyses and follow-up

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