

**DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL**

**REPORT OF INVESTIGATION INTO CHEATING ON
THE DC COMPREHENSIVE ASSESSMENT SYSTEM
STANDARDIZED EXAMS ADMINISTERED BY THE
DISTRICT OF COLUMBIA PUBLIC SCHOOLS
OIG NO. 2011-0318**

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Investigative Synopsis

I. Background

A. The Allegations

By letter dated March 29, 2011, the then Acting Chancellor of the District of Columbia Public Schools (DCPS) requested that the District of Columbia Office of the Inspector General (OIG) investigate allegations of cheating on the DC Comprehensive Assessment System (DC CAS) standardized exam. The referral was based in part on a *USA Today* article entitled *When standardized test scores soared in D.C., were the gains real?*, which was published on March 28, 2011.¹

B. Scope of the Investigation

After reviewing the DCPS request for investigation and pertinent news reports, which focused on the high number of wrong-to-right erasure rates on DC CAS exams² administered at the Noyes Education Campus (Noyes), the OIG began the investigation with a detailed review of DC CAS exams administered to third through eighth grade students at Noyes in the 2008-2009 and 2009-2010 school years.³ The investigation began with Noyes because Noyes was highlighted in press reports, had a high wrong-to-right erasure rate, and had been selected to receive the Together Everyone Achieves More (TEAM) awards⁴ twice, which resulted in a monetary bonus for the principal, guidance counselor, and each individual teacher and staff member who worked there in the 2006-2007 and 2008-2009 school years.

During the investigation, investigators interviewed 32 current and former Noyes staff members including 16 teachers, the principal, the guidance counselor (who also was the Noyes test coordinator), instructional and literary coaches, special education and middle school coordinators, and custodians.⁵ Investigators also interviewed Office of the State Superintendent of Education (OSSE) and DCPS personnel who were monitors at Noyes for the DC CAS exams

¹ Jack Gillum and Marisol Bello, *When standardized test scores soared in D.C., were the gains real?*, USA TODAY, March 28, 2011.

² DC CAS exams generally take place in the spring and are given to all DCPS students in grades 3 through 8, and grade 10.

³ The OIG worked on this investigation jointly with the U.S. Department of Education Office of Inspector General (ED OIG).

⁴ The TEAM awards are monetary awards distributed to all personnel in the DCPS schools that show the highest student achievement gains in a particular school year. The TEAM award is funded by the U.S. Department of Education Teacher Incentive Fund, DCPS, and private donations.

⁵ The OIG encountered delays during this investigation, particularly at the start and when trying to schedule interviews with teachers so as not to interfere with the school schedule.

administered in the 2008-2009 or 2009-2010 school years, as well as 23 parents⁶ of students who attended Noyes during the pertinent time period. Investigators also interviewed the current and former DCPS Chancellors, as well as the current and former DCPS General Counsels.

Investigators reviewed a report previously issued by Caveon, a test security company that DCPS hired to conduct an analysis of the wrong-to-right erasures for the DC CAS exams administered during the 2008-2009 school year, in the spring of 2009. Investigators reviewed the CTB/McGraw Hill Test Chairperson's Manual (McGraw Manual) issued in 2008, 2009, and 2010, as well as the OSSE State Test Security Guidelines (OSSE Guidelines), issued in February 2010. Investigators also reviewed DCPS documentation of reported instances of possible test security violations and the corresponding investigative reports of those instances for the 2008-2009, 2009-2010, and 2010-2011 school years. Finally, investigators reviewed OSSE's 2011 DC CAS Test Integrity Investigation results, which were released on June 21, 2012⁷.

Based on the facts uncovered after the review of DC CAS exams administered at Noyes for the 2008-2009 and 2009-2010 school years (as further discussed in Section IV of this report), as well as our review of the DCPS and OSSE investigative results identified above, this Office found an insufficient basis to expand the scope of the investigation to examine other DCPS schools in the same manner as Noyes. We point out to readers, though, that much of the information obtained throughout our review of Noyes and our corresponding recommendations, particularly regarding exam security procedures, is applicable to other DCPS schools administering the DC CAS exams or other DCPS standardized tests.

II. Factual Findings of the Investigation

A. Assisting Students With Identifying Wrong Answers

One former Noyes teacher (Teacher 1), who administered the DC CAS exam in the 2009-2010 school year, told investigators that the test coordinator⁸ told teachers at the daily teacher meetings that teachers should create a seating chart for their students based on the anticipated performance of each student on the upcoming DC CAS exam. Teachers were directed to analyze student performance on practice exams and classify the students into three groups: 1) those who would perform well; 2) those who would perform poorly and have little to no chance of success on the exam; and 3) those predicted to score in the "basic range," which means that they were not anticipated to score particularly well, but, with assistance, might improve their performance to a "proficient" level. According to Teacher 1, the test coordinator directed teachers to seat the

⁶ Investigators sought to interview both parents and students of 79 families with students who attended Noyes. Only 23 parents, however, consented to interviews.

⁷ OSSE hired Alvarez & Marsal to conduct this investigation, which followed up on reports of anomalies that occurred during the tests. After being informed of the Alvarez & Marsal investigation, OIG investigators decided to add a review of those investigative results to this investigation.

⁸ The Noyes test coordinator was the school's guidance counselor. In an interview with investigators, the test coordinator said that his duties were to train Noyes employees to act as proctors, assign proctors to certain classrooms, and provide instructions to new teachers on how to administer the DC CAS exam.

basic range students in the back of the classroom, where it would be more difficult for the monitors⁹ to observe them through a window or a doorway, so that teachers could assist these students.

Teacher 1 told investigators that during the 2009-2010 DC CAS exam, he/she walked around the classroom and looked over the shoulders of students in the basic range.¹⁰ Teacher 1 said that he/she silently pointed to wrong answers so that students would re-analyze their answers, erase the wrong answers, and fill in other answers.¹¹ Teacher 1 said that if the student did not then select the correct answer, he/she continued to point at the question until the student filled in the correct answer. Teacher 1 said that he/she could not remember the names of any of the students he/she assisted in this manner. Teacher 1 told investigators that it “seemed” it was just “understood” that this was how you tested students at Noyes. The McGraw Manual for 2009 clearly states:

Student responses must not be coached or influenced with in any way, including making statements to students regarding accuracy of responses; reading items; defining words; giving students hints, clues, or cues; or altering or editing student responses. Those administering the test are encouraged to walk around the room during testing and should check to see that students are marking their responses appropriately.

Teacher 1 said that the students seemed to understand what to do even though all of these actions were non-verbal. Teacher 1 also said that the proctor assigned to his/her classroom (Proctor 1) also assisted the students by pointing to wrong answers. Proctor 1, however, denied assisting students in this or any other manner and denied observing or having any knowledge of Teacher 1 having assisted students in any other manner on the exams.

None of the other 15 teachers interviewed told investigators that students were assigned seats based on anticipated performance on the exam so that teachers could assist them with identifying wrong answers. In addition, no proctors told investigators that they or the teachers in their classrooms assisted students with identifying wrong answers. Finally, the test coordinator denied directing teachers to identify students who were anticipated to perform poorly and seat them out-of-view of the monitors so that they could assist those students.

Moreover, the former Noyes Principal (Principal 1) told OIG investigators that each teacher should be aware of his or her students’ academic abilities throughout the year, as well as the students’ results on the practice exams given throughout the years. Based on the results of the

⁹ The Noyes test coordinator told investigators that the monitors generally were personnel either from the DCPS central office or OSSE and were assigned to be present when the exams were signed out by the teachers and to roam the halls during the exam session. There were two monitors assigned to Noyes for the administration of the DC CAS exam.

¹⁰ Teacher 1 administered the 2009-2010 DC CAS exam for another teacher (Teacher 2) who went on leave shortly before the start of the exams. Teacher 1 said that Teacher 2 assisted with identifying which students were in the basic range. Teacher 2, however, denied having identified students in the basic range for Teacher 1 or having any knowledge of creating a seating chart for the exam.

¹¹ One of the DCPS monitors interviewed told investigators that during the administration of the 2009-2010 DC CAS exam at Noyes, she observed a different teacher lingering over students’ shoulders. The DCPS monitor said it appeared as if the teacher was examining students’ test paperwork closely, but she could not determine whether the teacher was assisting the students in any way.

practice exams, teachers should know which students are at the basic level and which basic level students are “on the bubble” to rise to the proficient level. Principal 1 further explained that it is every teacher’s job to work hard with all students, and possibly extra hard with bubble students, to raise their test scores. When asked about the seating of students, Principal 1 denied that students were seated in any special areas of the classroom.

B. Advance Copy of the Exam

Teacher 1 also told investigators that in the week prior to the 2009-2010 DC CAS exam, the test coordinator gave Teacher 2¹² a copy of the official exam booklet and said that Teacher 1 and Teacher 2 should make copies if necessary “to do what you need to do.” Teacher 1 said that he/she understood that they were to use the official exam to create practice questions of difficult questions for students who might have trouble answering them correctly. Teacher 1 said that he/she and Teacher 2 then created 8 to 12 practice questions by changing the names and numbers in the official questions. Teacher 2, however, denied having received an advance copy of the official exam.

Another former teacher (Teacher 3) told investigators that the test coordinator distributed the official exam to teachers prior to exam day and instructed the teachers to go over the test with the students. Teacher 3 said, however, that the test coordinator did not explicitly direct teachers to give students advance knowledge of the test questions.

When interviewed, the test coordinator denied having shared the official exam with any teachers prior to the administration of the exam or having instructed any teachers to use the official exam to create practice questions for the students. In addition, Principal 1 denied having any knowledge of anyone distributing official test booklets in advance.

C. Overall Exam Security

The investigation revealed that CTB/McGraw Hill created its manual each year, which covered test security procedures, specifically for DCPS and the DC CAS exams. Both OSSE and DCPS acknowledged that the procedures contained in the McGraw Manual for each year were in place and applicable to all DCPS schools administering the DC CAS exams. A review of the procedures contained in each McGraw Manual indicates that it covered topics such as receipt, inventory, and distribution of test materials, how to secure the exams and answer sheets, how to conduct training sessions for test administrators and proctors, and test administration protocols to ensure the integrity of the test environment and materials. In addition, in February 2010, OSSE issued the OSSE Guidelines which essentially covers the same security procedures, but includes some additional protocols regarding medical emergencies and use of external devices.

The Noyes test coordinator also provided investigators with details concerning the administration of the exams and overall exam security in the 2008-2009 and 2009-2010 school years. The test coordinator said that the official exams were delivered to Noyes the week prior to the exam, in boxes.¹³ The exams came with answer sheets, with pre-printed, bar-coded labels containing the

¹² Teacher 2’s classroom was identified as having a high wrong-to-right erasure rate.

¹³ This is typical/standard practice for all DCPS schools and not limited to Noyes.

students' names and other information that school personnel had to affix to blank answer sheets.¹⁴ This is consistent with the security procedures in the McGraw Manuals for those two years. Once delivered, the exams and answer sheets were stored in a locked office adjacent to the test coordinator's office. The OSSE chief of data and accountability told investigators that each student at all DCPS schools uses one answer sheet throughout the 4 days of testing for reading and math.¹⁵

The Noyes test coordinator also said that at the conclusion of testing each day, teachers were required to turn in the exam booklets and student answer sheets. The test coordinator secured the exams and answer sheets in the locked office adjacent to his office. The test coordinator said that he, the principal, and the custodians all had keys to that office. The test coordinator also told investigators that the exam booklets and answer sheets were kept on-site, as described above, until after the conclusion of the 4-day exam period and the make-up exams. The McGraw Manuals provided that the test materials should be secured in locked storage inaccessible to students. The McGraw Manuals did not provide any specifics as to where the locked storage should be located or who or how many people should have access to that locked storage location. Noyes was required to ship the exam booklets and answer sheets to CTB/McGraw Hill, the exam publisher and scorer, within 1½ weeks of the conclusion of the exam period.¹⁶ In addition, Principal 1 described the security procedures similarly, verifying that he, the test coordinator, and the custodians all had keys to that office. He also stated that there were no lapses in the overall security of the exam booklets and answer sheets.

Teacher 3 also told investigators that OSSE supplied two monitors to patrol the halls during the administration of the DC CAS exams. Teacher 3 said that Principal 1 would not permit any of the monitors to enter a classroom during the exams and only permitted the monitors to look through the glass portion of the classroom doors to monitor exam activity. Principal 1 told investigators that he never instructed the teachers to keep the classroom doors closed so that the monitors could not enter the classrooms and never instructed the monitors not to enter the classrooms.

Furthermore, the OSSE and DCPS monitors assigned to Noyes for the administration of the DC CAS exam in the 2008-2009 school year (Monitor 1 and Monitor 2, respectively) told OIG investigators that they were not prohibited from entering any classrooms. Monitor 1 said that she looked through the windows on the doors of classrooms with closed doors. Monitor 2 said that she roamed freely through the hallways, occasionally entered the doorways of classrooms with open doors, and generally peered in through the glass windows on the doors of classrooms with closed doors.

The OSSE monitor assigned to Noyes for the administration of the DC CAS exam in the 2009-2010 school year (Monitor 3) told investigators that he entered one classroom and remained there for approximately 20 minutes to see how the students functioned before, during, and after a

¹⁴ For grade 3, however, the exam booklet and answer sheet were one document.

¹⁵ The OSSE chief of data and accountability described much of the exam administration process as being the same for all DCPS schools. The only portion of the test administration process that is left to the discretion of the individual schools is which portion of the exam to administer on which day.

¹⁶ This is typical/standard practice for all DCPS schools and not limited to Noyes. In fact, the McGraw Manual for 2008 states that all materials are to be picked up by close of business on May 8, 2008.

break. Monitor 3 said that Principal 1 asked him why he entered the classroom and he explained his reasons. Monitor 3 told investigators that Principal 1 did not instruct him not to enter any classrooms. Principal 1 told investigators that Monitor 3's actions had been reported to him differently. Principal 1 said that he had been told that Monitor 3 had remained at the front of the classroom for approximately 15 minutes, causing "extreme stress" for the teacher, proctor, and students. Principal 1 acknowledged to investigators that he discussed this incident with Monitor 3 at the time and told him that his presence in the classroom had been disruptive to the classroom. Principal 1 also told investigators that he did not care if monitors entered the classrooms, as long as they were not disruptive.

The two DCPS monitors assigned to Noyes for the administration of the DC CAS exam in the 2009-2010 school year (Monitor 4 and Monitor 5, respectively) both said that the test coordinator instructed them not to enter classrooms with closed doors. Monitor 4 said that these instructions were provided in writing, but was unable to locate these written instructions to provide them to investigators. The test coordinator denied to investigators ever having issued any written or oral instructions to any monitor that he or she was not allowed to enter any classroom in which the door was closed. The test coordinator acknowledged, however, that he instructed monitors not to disrupt the classrooms.

Monitor 4 said that initially the test coordinator said that even for classrooms with open doors, they were not allowed to enter, walk around, or stand in the back or side. Instead, they were supposed to enter the doorway and briefly scan the room. Monitor 4 said that Monitor 5 challenged the test coordinator on this and the test coordinator relented somewhat and allowed them to stand just inside the doorway and for a longer period of time. The test coordinator denied issuing any instructions to monitors that they were only allowed to briefly scan a room from a classroom with an open door. The test coordinator said that he did not give monitors instructions that inhibited their access to classrooms.

Monitor 4 explained that she peered through the windows on the doors of classrooms with closed doors and briefly stood in the doorways of classrooms with open doors. Monitor 5 also told investigators that she looked through the windows on the doors of classrooms with closed doors and stood in the doorways of classrooms with open doors. Monitor 5 also told investigators that at some point during her second day at Noyes she was approached by Principal 1 who said that she should not go into the classrooms because he did not want her to disrupt the classrooms. Principal 1 denied to investigators having told Monitor 5 that she was forbidden to enter any classrooms. Principal 1 said that he only would have instructed Monitor 5 not to do anything that would be disruptive to the classroom.¹⁷

D. Exam Scores and Wrong-to-Right Erasures

In the normal course of the administration of the DC CAS exams, CTB/McGraw Hill scores the student answer sheets using machines that perform a scan analysis. The machines are calibrated to detect the intensity or shading of the marks on the answer sheets on a scale of 0 (lightest) to 15 (darkest) and will score any pencil marks 5 and above as an intended response. Marks at level

¹⁷ The investigation revealed no evidence that DCPS had a definitive written policy as to whether monitors should or could enter classrooms during testing.

four are considered erased responses.¹⁸ Once the exams are scored, the CTB/McGraw Hill Research Department analyzes the scores, marks, and answer patterns. For the DC CAS exams administered in the 2007-2008 school year, the CTB/McGraw Hill Research Department analysis flagged the schools and classrooms that deviated from the norm and provided an analysis to OSSE. CTB/McGraw Hill Research Department conducted the same analysis for the DC CAS exams administered in subsequent years through the 2010-2011 school year.

DCPS hired Caveon to evaluate the 2008-2009 DC CAS exam results, after receiving a letter dated November 20, 2009, from OSSE, directing it to conduct a review of security and test administration procedures in certain schools. OSSE's direction to DCPS came after OSSE had commissioned statistical analyses of the 2009 DC CAS results, which revealed gains in achievement from 2008 to 2009, and wrong-to-right erasures. The former DCPS Chancellor told investigators that she was contacted by OSSE in August or September of 2008 and informed that OSSE was reviewing large gains in test scores at certain DCPS schools for the 2007-2008 DC CAS and having CTB/McGraw Hill conduct an erasure analysis. The former Chancellor explained that, over a number of months, she received a number of erasure analyses, which provided information on a decreasing number of schools. She said that her staff asked clarifying questions and there was a lot of confusion over the erasure analyses. DCPS formally responded to OSSE, by letter dated February 28, 2009, stating that DCPS had examined OSSE's erasure analysis and requesting additional information, as well as access to the actual answer sheets. Subsequently, the Chancellor decided that given that the 2008-2009 DC CAS exams were only approximately one month away, DCPS would tighten security and allow the exams to take place, so as not to cause a disruption to the testing staff. After the administration of the 2008-2009 DC CAS exams, DCPS hired Caveon to analyze schools with high wrong-to-right erasures.

DCPS's December 2009 statement of work requested that Caveon evaluate existing security practices, the appropriateness of specific schools' security practices, and provide an evaluation of those methods, an analysis of any misbehavior uncovered, and recommendations for security enhancements. Accordingly, Caveon's investigation included an analysis of test score results to determine whether there were unusual gains, excessive wrong-to-right erasure patterns, and similar answer patterns. With respect to Noyes, Caveon's investigation concluded the following:

- ◆ There were huge gains in reading scores, in grade 5 only. Caveon did not identify any inappropriate conduct that accounted for these gains;
- ◆ Changes to exam preparation, including the use of more practice probes and an increased emphasis on test taking skills, may have led to increases in student efficiency;
- ◆ One teacher (Teacher 4) told Caveon that she instructed students to mark "Xs" next to wrong answers in the test booklets as part of their process of elimination, which could account for an unusual number of erasures if the students also marked "Xs" next to the wrong answers on the answer sheets;
- ◆ Based on its on-site interviews, review of testing policies and procedures, test score data review, and review of reports on individual schools, Caveon did not find evidence that any "misbehavior" had occurred at Noyes; and
- ◆ Many of the test score gains are plausible.

¹⁸ Marks detected at levels one, two, or three are considered to be "noise" and are disregarded by the machine.

With respect to the high numbers of erasures, a number of teachers and other Noyes staff members that Caveon interviewed provided explanations for why they thought the erasures occurred and were appropriate. Teachers described students going back to review and correct their work before the end of the exam. The test coordinator also told Caveon that teachers were instructed to tell students to check all answers and change them, if necessary, and an educational assistant told investigators that some students answered too quickly and then went back to review their work. The test coordinator also told investigators that under the previous school Chancellor, the exams were not timed, which allowed students more time to go back and review their answers. He said he thought this might have accounted for the unusual number of erasures. Principal 1 also told investigators that he thought the high number of erasures was due to students taking more time to review their work and then changing their answers.

Finally, one teacher (Teacher 5) recounted to investigators a problem she had with the exams. She explained that the exams are color coded because the questions on exams of different colors are in a different order. Students who sit next to each other are not supposed to have the same color exam. Teacher 5 said that she administered an exam in which students sitting next to each other had the same color exam and, as a result, six students had to re-take that portion of the exam. Teacher 5 told investigators that she believed the students were provided with their own answer sheets and erased all of the answers to questions on that portion of the exam before retaking that portion of the exam.

An analysis of the test scores for Noyes for the 2007-2008 school year as compared to the 3 subsequent years, shows that exam scores dropped after the 2008-2009 school year. The proficiency rates for these 4 school years are as follows:

	<u>2007-2008</u>	<u>2008-2009</u>	<u>2009-2010</u>	<u>2010-2011</u>
Math Scores	56%	64%	53%	28%
Reading Scores	60%	84%	61%	32%

The test coordinator, Principal 1, and several of the teachers interviewed told investigators that the drop in scores after 2008-2009 is attributable to an influx of new students from lower performing schools and an increase in the number of special education students enrolled at Noyes. Data received from OSSE shows that the number of special education students taking the DC CAS exams increased from 18 in 2008-2009 to 29 in 2009-2010. Investigators, however, note that Caveon began interviewing Noyes teachers regarding the wrong-to-right erasure rates in early 2010.

Investigators interviewed 23 parents of students who attended Noyes.¹⁹ None of the 23 parents told investigators that their children had informed them of any instances of cheating. Similarly, none of the 23 parents reported information from their children concerning teachers having assisted them with correcting answers or selecting the correct answer. Finally, all of the 23

¹⁹ Of the 23 parents of Noyes students interviewed, 19 had children who attended Noyes for the 2008-2009 and/or 2009-2010 school year. Three had children who began attending Noyes in the 2010-2011 school year, and one parent's child graduated from Noyes at the conclusion of the 2005-2006 school year.

parents said that they felt that the scores their children achieved on the DC CAS exams were indicative of their overall school performance and consistent with other test scores. Investigators interviewed one parent, whose child graduated from Noyes at the conclusion of the 2005-2006 school year and who was quoted in media reports as having said that his daughter's scores on the DC CAS exams were inconsistent with her scholastic abilities. This parent said that his daughter consistently scored proficient or above proficient in the reading and/or math sections of the DC CAS exams, even though she previously had been tested as a special needs student and was receiving home tutorial services to help her in her academic studies because she had been assessed as having difficulty retaining information. That parent, however, was unable to provide investigators with any further details or investigative leads to corroborate his statements. This parent also told investigators that his daughter graduated a year early, from a D.C. Charter school, and investigators note that this student is now in college. Despite several attempts to interview that student, investigators were unable to do so.

The former Chancellor also pointed out that large gains in scores were possible at some schools because some students were on the cusp of improving their test scores from basic to proficient. She said that it would not be difficult for a student with a good, qualified teacher, who was only two to three questions away from reaching the proficient level, to improve his or her score and reach the higher level.

III. Additional Information

Investigators interviewed the current DCPS Chancellor who stated that after the cheating allegations were reported in the media, she was informed of concerns from a number of sources that the Caveon investigation may have been insufficient. Therefore, even though she had no additional evidence to provide investigators, out of an abundance of caution, she referred the matter to the OIG to investigate.

Investigators discussed with the Chancellor several other schools that had been reported either in the media or in the Caveon report as having high numbers of erasures. For example, the Caveon report mentioned an issue regarding Stanton Elementary School. The Chancellor was knowledgeable about the issue, which was unrelated to testing, and provided information indicating that the previous Chancellor had dealt with the issue appropriately. Similarly, Burrville Elementary School was mentioned in the Caveon report because one teacher told Caveon that the teachers were responsible for cleaning up stray marks on answer sheets. The Chancellor informed investigators that teachers are not supposed to clean up stray marks on answer sheets and that OSSE invalidated the scores for that teacher's class.²⁰

In addition, with respect to J.O. Wilson Elementary School, the press reported that it had a high number of erasures in more than 80% of its classrooms in 2009. Caveon, however, reported no irregularities at this school. The Chancellor said that she believes that J.O. Wilson Elementary School is a great school where any visitor can see "quality, engagement, and rigor." Based on

²⁰ The McGraw Manual clearly states that "[s]tudent responses must not be edited or altered in any way," but also states that proctors are to "make sure there are no sticky notes, staples, pins, paper clips, and no tape of any kind on any pages. Remove any of these extraneous materials."

her knowledge of this school, the Chancellor said that she does not consider a high number of erasures to be an indication of a problem and she feels that the rising scores at that school are indicative of the quality teachers there.

Further, one of the Noyes monitors interviewed raised issues regarding the role of the monitors and the instructions given to them on what to look for and how to handle suspicious activity. The monitor pointed out that the monitors did not even know whether classrooms were supposed to have proctors and there was no place on the observation report²¹ to make an entry if the classroom did not have a proctor. In addition, two monitors said that a majority of the classrooms they observed during the 2009-2010 DC CAS exam did not have proctors. Both the test coordinator and Principal 1 told investigators that all of the classrooms were supposed to have a proctor present during the entire test period.²²

Investigators also note that the three McGraw Manuals reviewed all contain an OSSE Confidentiality Agreement²³ for all personnel who work on administering the DC CAS exams to sign. A Confidentiality Agreement would have expressly prohibited revealing exam-related information to students and, as such, any instructions to teachers to assist or actions toward assisting students with the exam would have been in direct violation of a Confidentiality Agreement. OSSE personnel, however, told investigators that no one signed this Confidentiality Agreement in 2008, 2009, and 2010.²⁴

A review of the DCPS documentation of reported instances of possible test security violations and the corresponding investigative reports for the 2008-2009, 2009-2010, and 2010-2011 school years revealed no evidence of widespread cheating or criminal activity. Instead, DCPS documentation, which covered all District and public charter schools, revealed several anomalies similar to the ones uncovered by investigators when reviewing Noyes. For example, DCPS found evidence that one teacher at Watkins Elementary School assisted students on the 2009-2010 DC CAS by talking to the students and pointing to the test booklets. DCPS terminated this teacher after the completion of its investigation. In another example, DCPS found evidence that during the 2008-2009 DC CAS, a teacher's aide at Aiton Elementary School provided an inappropriate accommodation to a special education student, and subsequently was prohibited from conducting any further testing. Further, during the 2010-2011 DC CAS, a teacher at Martin Luther King, Jr. Elementary School was investigated by DCPS for pointing out correct answers to students. DCPS reported that the teacher resigned prior to the completion of the investigation.

DCPS also documented instances of teachers erroneously giving unapproved accommodations to special education students, erroneously allowing students to use calculators and a magnifying glass, and leaving content-related material visible in the classroom during the administration of

²¹ Monitors were required to fill out an observation report entitled the Test Site Observation Report in 2009 and the 2010 DC CAS Daily Observation form in 2010. Each form contains an entry that says, "Proctors monitor assigned stations," with boxes for the monitor to check off indicating Yes, No, or Not Observed.

²² The test coordinator denied that the majority of the classrooms did not have proctors. He said that it was possible that if one or two proctors were absent on a particular day because of illness or an emergency, there might not have been staff available to cover that proctor's assignment. Principal 1 said that the only classrooms that might not have had a proctor would have been the classrooms with special education students because there were only two or three special education students in each classroom.

²³ The 2008 and 2009 McGraw Manuals each contain a document called a Confidentiality Agreement. The 2010 McGraw Manual contains a document called a "State Test Security and Non-Disclosure Agreement."

²⁴ OSSE reported sporadic compliance with the 2011 non-disclosure agreement.

the DC CAS. Finally, OSSE's 2011 DC CAS Test Integrity investigation uncovered several of the same and/or similar instances as those documented by DCPS. OSSE's investigation also did not reveal evidence of widespread cheating or criminal conduct. OSSE's investigative report, however, notes a need for improved test security controls and uniformity in test administration procedures.

IV. Analysis and Conclusions

The investigation revealed a number of problems with overall exam security, which may have compromised the integrity of DC CAS exams administered at Noyes. The information obtained from the interviews conducted shows that there were security flaws at Noyes in the administration of the DC CAS exams for at least 3 school years, 2008-2009, 2009-2010, and 2010-2011. Many of the security issues noted may be applicable to other schools as well.

The investigation revealed that the official exam booklets were delivered to Noyes prior to the first day of the exam and stored in a locked office to which at least three people had the key. Having the exam booklets on-site prior to the first day of the exam allows for many opportunities for the exam to be compromised or an exam booklet to be stolen or copied. Storing them in an office to which at least three people had the key allows for opportunities for theft, review, or copying.

With respect to the answer sheets, investigators were told that students started on the first day of the exam with an answer sheet containing a pre-printed, bar-coded label, which they turned in at the completion of the exam on each day. The next day, the students received the same answer sheet, containing their answers from all of the previous days, and were expected to add the answers from that day's section of the exam to the same answer sheet. This allows students opportunities to change their answers on sections of the exam administered in previous days. Also, as noted above, the answer sheets were stored each day in a locked office to which at least three people had the key, with no additional security. This practice affords opportunities for the answer sheets to be lost, stolen, misfiled, or tampered with, such as having answers erased and changed.

With respect to allegations that Noyes personnel erased and changed student answers on their answer sheets, investigators found no evidence to corroborate these allegations. In addition, investigators were unable conclusively to determine whether the official exam booklets had been distributed as described. The investigation, however, revealed some anecdotal evidence that the official exam booklets, which were on-site prior to the beginning of the exam, had been distributed to teachers for use in creating practice questions and/or providing instructions to the students, in preparation for the actual exam.

The investigation also revealed one specific instance where it appears that a teacher assisted students with identifying wrong answers during the exam. Teacher 1 admitted seating students in the basic range in the back of the classroom where it would be more difficult for a hall monitor to observe them. Teacher 1 also admitted walking around the classroom, looking over the shoulders of these students, and silently pointing to wrong answers, several times, if

necessary, until the students erased their wrong answers and filled out the correct answers.²⁵ Teacher 1 also said that he/she could not remember the names of any of the students he/she assisted in this manner. Although investigators were unable to decisively determine whether Teacher 1 had been instructed by the test coordinator to seat the students in this manner and could not corroborate through Proctor 1 that Teacher 1 assisted students in the manner he/she described, investigators have no reason to question the veracity of Teacher 1's admissions as to his/her own conduct.

After completing the review of DC CAS exams administered at Noyes, the OIG assessed whether expanding the scope of the investigation to other schools was warranted, noting that it is logical to conclude that once the erasure issue came to light, any improper practices that may have occurred in the past would diminish. Based on this assessment, which also included weighing factors such as the existence of specific allegations and the nature of the allegations, the facts uncovered during the investigation related to Noyes, the results of Caveon's investigation, and information received from the current DCPS Chancellor, the OIG found an insufficient basis to warrant expanding the scope of the investigation to other DCPS schools. Specifically:

- ◆ The OIG noted the disparity in the (unusually high) number of erasures. The mere disparity, as noted and/or inferred from the Caveon report, without more (such as specific evidence of impropriety), was not a sufficient basis to conclude the erasures resulted from cheating;
- ◆ A review of Caveon's report of investigation revealed no corroborated evidence of cheating or indicators of widespread cheating to provide investigative leads for OIG investigators to pursue;
- ◆ Several of those interviewed during the investigation had worked at other schools, either before or after working at Noyes. None of those interviewed informed investigators of cheating at any of those other schools;
- ◆ Although the OIG investigation as to Noyes revealed areas where test security should be improved, it did not reveal any evidence of widespread cheating or indicators of widespread cheating; and
- ◆ Information received from the current DCPS Chancellor regarding the Caveon investigation and report, as well as her knowledge of the issues relating to the allegations regarding erasures on DC CAS exams, revealed no additional evidence to corroborate the allegations or provide investigative leads to pursue.

The lax security employed at Noyes during the administration of the DC CAS exams, as exhibited by each of the specific details noted above, contributed to creating an atmosphere where cheating on the exam and/or other actions that could compromise exam integrity could have occurred.

While the investigation did not reveal evidence of criminal activity²⁶ or widespread cheating on the DC CAS exams, the investigation did reveal deficiencies and problem areas, warranting recommendations to DCPS for action.

²⁵ Teacher 1 was terminated from DCPS for this conduct.

²⁶ Because the investigation did not reveal evidence of criminal activity, this matter was not referred to the United States Attorney's Office for the District of Columbia.

V. Recommendations

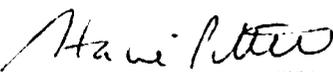
The OIG recommends that DCPS review the factual findings of this investigation, determine their applicability to all DCPS schools, and implement sufficient procedures, as needed, to ensure the integrity of DC CAS exams administered to its students. Such security and non-security related procedures should include:

- ◆ Take delivery of the official exam booklets on the day that section of the exam is to be administered to mitigate the opportunities for cheating;
- ◆ Provide additional on-site security to ensure that the exam booklets are secured with limited access, until they are distributed to the classrooms and distributed properly;
- ◆ Transport the official exam booklets used each day and the student answer sheets used each day to a secure, off-site location to mitigate opportunities for alteration;
- ◆ If having the official exam booklets delivered to the test sites each day of the exam is not possible, then the official exam booklets must be stored in a secure location, to which only select personnel have access, and provide additional security to guard the exams overnight;
- ◆ Take all steps possible to ensure that the official exam is not distributed in advance of exam administration and not used for improper purposes such as the creation of practice questions;
- ◆ Have students start each test day with a blank answer sheet, which will contain only the answers to questions administered on that test day;
- ◆ Consider having all exams and answer sheets placed into sealed boxes, by classroom, at the conclusion of testing each day. All seals should be examined when the boxes are distributed to the classrooms the next day, to ensure that no tampering/opening took place overnight;
- ◆ Have a monitor on-site each day to count all test booklets and ensure that each test booklet is sealed before it is distributed for the administration of the exam. That monitor also should count and verify that all test booklets and answer sheets are turned in at the completion of the exam each day. This monitor should be someone who is not an employee of that particular school;
- ◆ Increase the number of proctors so that there are at least two people, in addition to the teacher, present in the classroom during the administration of the exam;
- ◆ Rotate the teachers and proctors so that teachers and proctors do not administer the exam to their own students and so that the teachers and proctors are not in the same classroom each day of the exam;
- ◆ Increase the number of monitors so that monitors can regularly view the classrooms during the exam and ensure that the monitors can view all parts of the classroom;
- ◆ Provide more specific instructions to the monitors as to what they are supposed to look for and how and when they are supposed to report anomalies and/or irregularities;
- ◆ Establish a written policy clarifying whether monitors should enter classrooms during testing;
- ◆ Provide teachers, proctors, and monitors with a form on which they are required to report any anomalies that occur during the administration of the exam. Train all appropriate personnel on the use of such forms. Assign appropriate personnel to review all such forms at the conclusion of the administration of the DC CAS exams on each day;

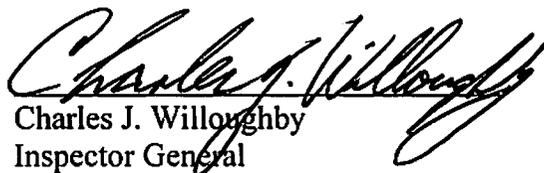
- ◆ Determine whether there was a pervasive perception that students were seated according to ability and/or anticipated exam performance and ensure that future written seating charts are created only for legitimate educational and exam security purposes;
- ◆ Conduct training regarding exam security for all teachers, proctors, monitors, and other school personnel to ensure that all staff members understand the need to protect exam integrity at all times; and
- ◆ Conduct appropriate training to remind all personnel of their obligations to report matters of waste, fraud, and abuse to the OIG.

Based on the foregoing, the OIG found insufficient evidence on which to conclude that there was widespread cheating on the DC CAS exams for the period in question.

Report Approved by:



Stacie Pittell
Assistant Inspector General
for Investigations



Charles J. Willoughby
Inspector General

Dated: August 8, 2012