May 16, 2013

The Honorable Arne Duncan
Secretary
U.S. Department of Education

K-12 Education: States' Test Security Policies and Procedures Varied

Dear Mr. Secretary:

Student results on statewide assessment tests required under the Elementary and Secondary Education Act of 1965 (ESEA), as amended, are used to measure students' proficiency in core subjects, hold schools accountable for student achievement, and make key decisions, such as determining which low-performing schools should receive targeted interventions in order to improve student achievement. Therefore, it is critical that these results be valid and reliable.

However, in recent years, instances of cheating by educators on state assessments have surfaced, undermining the integrity of the test results. For example, 82 educators in 30 Atlanta schools confessed to improperly raising scores on state tests administered in the 2008-09 school year. According to a district attorney press release, there were 35 indictments resulting from this investigation. Effective and rigorous assessment security policies, when properly implemented, can help prevent and detect cheating and other testing irregularities, but GAO's prior work on the implementation of assessments showed that one of four states judgmentally selected for review relied on inadequate security procedures that could negatively affect the validity and reliability of their assessment systems.[1]

In 2010, the Council of Chief State School Officers (CCSSO) and the Association of Test Publishers (ATP) published a set of voluntary best practices for states and testing companies to use to strengthen the implementation of state assessment programs. Their publication includes best practices in six categories related to the security of paper- and computer-based tests.[2] However, it is not known whether states have included these practices in their security policies and procedures or what additional efforts states have under way to detect and prevent cheating or other irregularities.

Because state assessments—which the U.S. Department of Education (Education) has supported with over $2 billion since 2002—serve as the basis for school accountability and allocation of resources for targeted interventions, we prepared this report under the authority of the Comptroller General to conduct work on GAO's initiative.[3] Our objectives were to determine:

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[1] GAO, *No Child Left Behind Act: Enhancements in the Department of Education's Review Process Could Improve State Academic Assessments,* GAO-09-911 (Washington, D.C.: Sep. 24, 2009).

[2] The Council of Chief State School Officers and the Association of Test Publishers, *Operational Best Practices for Statewide Large-Scale Assessment Programs* (Washington, D.C.: 2010).

[3] See 31 U.S.C. § 717(b)(1).

1) the extent to which states' policies and procedures include leading practices to prevent testing irregularities,
2) what oversight states use to help ensure that districts and schools are following test security policies and procedures, and how often cheating by school officials was identified as part of this oversight, and
3) what sources of information or assistance states rely on for test security issues and what additional assistance would be useful.

Scope and Methodology

To address our objectives, we designed and administered a web-based survey of testing administrators in the 50 states and the District of Columbia.[4] We conducted our survey from November 2012 to January 2013, and received a response rate of 100 percent. We relied on the *Operational Best Practices for Statewide Large-Scale Assessment Programs* guide as a basis to design the survey. The survey included questions about each state's assessment program generally, as well as more specific questions about policies and procedures related to test administration, training, and states' oversight of assessment security policies and procedures for computer-based assessments.[5] We also collected information on states' oversight activities and the extent to which states detected instances of cheating by school officials.

To inform the survey, we conducted pretests with testing officials from four state educational agencies. We also conducted site visits and semi-structured interviews with state educational agencies and school districts in two states—Tennessee and Virginia. These states reflected a range of districts (e.g., urban and rural), use of computer-based assessments, and alleged or confirmed incidences of cheating. To further inform the survey, we reviewed relevant documents from Education and interviewed Education officials and representatives from the Council of Chief State School Officers, the Council of Great City Schools, American Association of School Administrators, and the Association of Test Publishers. We also interviewed officials from one test security company, Caveon Test Security, and individual test publishers, such as CTB/McGraw Hill and Measured Progress. In addition, we analyzed relevant federal laws. We did not analyze or verify information pertaining to state laws, policies, or procedures; therefore, all such descriptions of state laws, policies, or procedures were obtained from survey responses.

We conducted our work from March 2012 to May 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Summary

In summary, our nationwide survey of state assessment directors indicates the following:
- According to our survey, all states reported that their policies and procedures included 50 percent or more of the leading practices to prevent test irregularities in the following

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[4] Throughout the report we refer to the District of Columbia as a state.

[5] Our survey did not examine state or local implementation of these test security policies.

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five areas—security plans, security training, security breaches, test administration and protecting secure materials. Additionally, of the 28 states that administered computer-based assessments, the majority reported including half or more of the leading practices in computer-based testing. However, states varied in the extent to which they incorporated elements of certain categories of leading practices. For example, 22 states reported having all of the leading practices for security training, but four states reported having none of the practices in this category. Although state officials reported having a variety of security policies and procedures in place, many reported feeling vulnerable to cheating at some point during the testing process.

- States reported using various tools, such as statistical analyses of student data, monitoring, and audits of testing procedures, to oversee districts' implementation of test security policies and procedures, and most states have used this oversight to identify cheating in recent years. According to the state officials we surveyed, these oversight tools detected potential cheating by school officials in school years 2010-11 and 2011-12. For example, officials in 40 states reported allegations of cheating in the past two school years, and officials in 33 states confirmed at least one instance of cheating. Further, 32 states reported that they canceled, invalidated, or nullified test scores as a result of cheating.

- States reported receiving assistance with test security from several sources, with testing contractors being the most frequent source of support. States also identified areas where additional assistance with test security would be useful. In particular, officials from the majority of states reported that it would be very or extremely useful if Education gathered and disseminated information on best practices in test security. After our survey was administered, Education released a report—consisting largely of the opinions of experts and practitioners—that discussed best practices and policies related to testing integrity.[6]

Concluding Observations

As more information about leading practices in test security is developed and disseminated, states will have improved access to the tools they need to develop strong policies and procedures in test security, and reduce their vulnerability to cheating on assessments. In particular, as more states begin using computer-based assessments—which may address some vulnerabilities of paper-based assessments, but may also create new ones, such as computer security breaches—additional guidance and oversight will be key to ensuring that appropriate policies and procedures are adopted by schools to address these new vulnerabilities.

Although the risk of cheating on statewide assessments can never be completely eliminated, implementation of strong policies and procedures for preventing cheating, combined with robust oversight and detection by states, can greatly improve the integrity of test results. Without these measures, there is a higher risk that decisions based on test results may be faulty, and lead to damaging results, including failing to identify and provide resources for underperforming schools and students most in need of academic support.

Agency Comments

We provided a draft of this correspondence to the Department of Education for review and comment. In its written comments, reproduced in enclosure III, Education complimented GAO's

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[6] U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, *Testing Integrity Symposium: Issues and Recommendations for Best Practice* (Washington, D.C.: 2013).

efforts to describe the test security policies and procedures reported by states. Education also recognized the remaining work that will be necessary to ensure test security in light of states' efforts to implement new assessments aligned with college- and career-ready standards. Further, Education stated that it would continue to share best practices with states to reinforce the importance of test security and integrity.

In addition to Education, we are sending copies of this correspondence to the appropriate congressional committees. We will also make copies available to others on request. This correspondence is available at no charge on the GAO website at http://www.gao.gov.

If you or your staff members have questions about this correspondence, please contact me at (206) 287-4809 or calboml@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this correspondence. Key contributors to this correspondence were Scott Spicer, Assistant Director; James Bennett; David Chrisinger; Paul Desaulniers; Alex Galuten; Danielle Giese; Jamila Kennedy; Jean McSween; Anna Maria Ortiz; Salvatore Sorbello; and John Townes. Also contributing to this correspondence were Lucas Alvarez; Amy Anderson; Deborah Bland; Jason Palmer; and Ashanta Williams.

Sincerely yours,

Linda M. Calbom
Western Regional Director

Enclosures (3)

K-12 EDUCATION: States' Test Security Policies and Procedures Varied

Briefing for the Secretary of Education

For more information, contact Linda M. Calbom, (206) 287-4809 or calboml@gao.gov.

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Overview

- Introduction
- Research Objectives
- Scope and Methodology
- Summary of Findings
- Background
- Findings
- Concluding Observations

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Introduction

- Statewide tests (or assessments) are used to measure students' performance in core subjects, hold schools accountable for student achievement, and make key decisions, such as targeting interventions to underperforming schools. Thus, it is critical that test results be valid and reliable.

- However, in recent years, reports of school officials cheating on statewide assessments have surfaced in districts across the country, undermining the integrity of test results. For example:
  - In 2012, California invalidated scores from 23 schools as a result of cheating by school officials, according to a local media report.
  - In Atlanta, Georgia, 82 public school teachers and principals admitted to cheating on tests administered during the 2008-09 school year. According to a district attorney press release, there were 35 indictments resulting from this investigation.
  - Similar allegations were also investigated in other states; for example, Illinois, Maryland, Pennsylvania, Texas, and Washington, D.C.

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Introduction (cont.)

- GAO's prior work on state assessments—which addressed challenges states face with implementing valid and reliable assessments and the U.S. Department of Education's (Education) oversight of assessment implementation—showed that one of four states judgmentally selected for review relied on inadequate security procedures.*

- Effective test security policies and procedures, when properly implemented, can help prevent and detect cheating and other irregularities that can undermine the validity and reliability of state assessments.

*GAO, *No Child Left Behind Act: Enhancements in the Department of Education's Review Process Could Improve State Academic Assessments,* GAO-09-911 (Washington, D.C.: Sep. 24, 2009).

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Research Objectives

We prepared this report under the Comptroller General's authority* to conduct work on GAO's initiative because reliable state assessments serve as the basis for school accountability and allocation of resources for targeted interventions. Our objectives were:

1) To what extent do states' policies and procedures include leading practices to prevent testing irregularities?

2) What oversight do states use to help ensure that districts and schools are following test security policies and procedures, and how often was cheating by school officials identified as part of this oversight?

3) On what sources do states rely for information or assistance with test security issues and what additional assistance would be useful?

*See 31 U.S.C. § 717(b)(1).

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Scope and Methodology

- We conducted a nationwide survey of state testing administrators to determine the extent to which their policies and procedures included leading practices in test security.*

  - We used the *Operational Best Practices for Large-Scale Statewide Assessment Programs*** as a basis to design the survey and conducted pretests with testing officials from four state educational agencies.

  - The survey asked questions on six categories of leading practices identified in the best practices guide—security plans, security training, security breaches, test administration, protecting secure materials and computer-based testing. The survey also included questions about state oversight and procedures and the extent to which oversight activities detected cheating.

- We conducted our survey from November 2012 to January 2013, and received a response rate of 100 percent.

*Our survey did not examine state or local implementation of these test security policies.
** The Council of Chief State School Officers and the Association of Test Publishers, *Operational Best Practices for Statewide Large-Scale Assessment Programs* (Washington, D.C.: 2010).

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Scope and Methodology (cont.)

- To inform the survey, we conducted site visits and semi-structured interviews with state educational agencies and school districts in two states—Tennessee and Virginia—that reflected a range of districts (e.g., urban and rural), use of computer-based assessments, and alleged or confirmed incidences of cheating by school officials.

- To further inform the survey, we reviewed documents and interviewed officials from Education, national education organizations, test publishing companies, and one test security company. We also analyzed relevant federal laws. We did not analyze or verify information pertaining to state laws, policies, or procedures; therefore, all such descriptions are taken from survey responses.

- We conducted our work from March 2012 to May 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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Summary of Findings

- All states reported including at least 50 percent of the leading practices in test security into their policies and procedures. However, states varied in the extent to which they incorporated certain categories of leading practices.* For example, 22 states reported having all of the leading practices for security training, but four states had none of the practices in this category. Despite having reported that they have various leading practices in place to mitigate testing irregularities and prevent cheating, many states reported feeling vulnerable to cheating at some point during the testing process.

- States use several tools to oversee test security, including monitoring, audits of testing procedures, and analyses of test data. As a result of these oversight activities, 40 states detected potential cheating during the past two school years and 33 states confirmed at least one instance of cheating. Further, 32 states reported canceling, invalidating, or nullifying test scores from individual students, schools, or districts because of suspected or confirmed instances of cheating by school officials.

- States relied on several sources for assistance with test security issues and identified additional areas where assistance from Education would be useful. Subsequent to our survey, Education issued a report—consisting largely of the opinions of experts and practitioners—that discussed best practices and policies for testing integrity.**

*See enclosure II for more information on leading practices by state.
**U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, *Testing Integrity Symposium: Issues and Recommendations for Best Practice* (2013). Page 8

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Background

- Since 2002, Education provided over $2 billion for state testing required under the Elementary and Secondary Education Act of 1965 (ESEA), as amended. ESEA requires states receiving ESEA, Part A funds to:

  - develop high-quality academic assessments that measure students' knowledge of reading/language arts, mathematics, and science;

  - test all students in grades 3 through 8 annually in mathematics and reading/language arts and at least once in grades 10 through 12; and

  - test students in science at least once during grades 3 through 5, 6 through 9, and 10 through 12.

- These assessments can be delivered via traditional pencil and paper or computer-based methods.

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Background (cont.)

- Student performance, as measured in part by these assessments, is the basis for school accountability, including corrective actions such as removing principals, implementing new curricula, or restructuring schools.

- Further, valid assessment results are necessary for resources to be accurately targeted to underperforming schools. For example, the School Improvement Grants program targets resources to schools that are below a certain threshold of student academic performance.

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Background (cont.)

- Some states provide awards or recognition for improving assessment scores, which could provide incentives to cheat.

- According to our nationwide survey:
    - 24 states* reported either providing awards or special recognition based on student test scores,
    - 24 states reported linking assessment scores to educator evaluations, and
    - 9 states reported linking assessment scores to promotions.

*Throughout this report, we refer to the District of Columbia as a state.

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Background (cont.)

- In 2010, the Council of Chief State School Officers (CCSSO) and the Association of Test Publishers (ATP) published a set of voluntary best practices in test security for states and testing companies.

- The practices were developed by a working group comprised of state education officials and representatives of test publishing companies and a test security firm.

- They cover topics central to designing, developing, administering, and scoring state assessments.

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Background (cont.)

- The working group reported applying several criteria to help ensure the practices they recommended were proven and would benefit users.

- For example, the working group assessed whether the practices were:
  - used by more than one state or testing company;
  - ready and available to be implemented; and
  - presented in a way that would permit alternative methods of attaining the same goal.

- CCSSO and ATP plan to publish a new guide that focuses on leading practices in test security for computer-based statewide assessments.

- According to the CCSSO and ATP document, states do not necessarily need to include all of the leading practices to have a successful test security program.

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Background (cont.)

- Education has led two initiatives aimed at collecting and sharing information on practices and policies that have been used to prevent, detect, and respond to testing irregularities:

  - First, Education published a request for information in the Federal Register on January 17, 2012, asking the public to submit best practices and policies regarding prevention, detection, and investigation of testing irregularities.[*]

  - In addition, on February 28, 2012, Education's National Center for Education Statistics sponsored a symposium on testing integrity comprised of external experts and industry leaders to discuss best practices and how these practices might change for computer-based assessments.
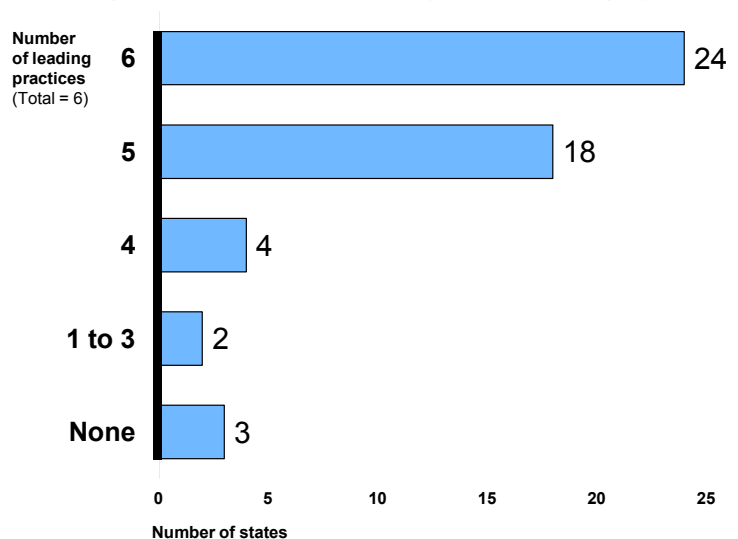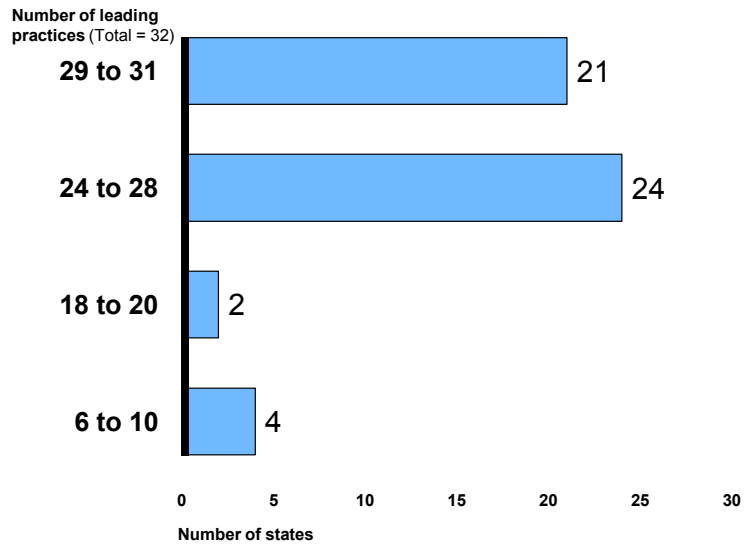
[*]77 Fed. Reg. 2280 (Jan. 17, 2012).

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Finding 1: Leading Practices
Extent of leading practices included in test security policies and procedures varied

According to our survey results, all states' policies and procedures included many of the leading practices to prevent testing irregularities; however, they varied in the extent to which they incorporated these practices. Further, despite their established test security policies and procedures to prevent cheating, states reported being vulnerable to cheating at some point during the testing process. See enclosure II for a complete listing of the leading practices in each category and information on cases of leading practices reported by states.

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Finding 1: Leading Practices
Extent of leading practices included in test security policies and procedures varied

• All states reported having at least 50 percent (37 of 74) of the leading practices across five of the six categories: security plans; security training; security breaches; test administration; and protecting secure materials.*

Figure 1: Number of states that reported having various percentages of leading practices across five categories of leading practices

Percentage of leading practices (Total = 74)	50% (37)	51% to 74% (41-55)	75% to 89% (56-66)	90% or more (67-72)
Number of states	1	15	21	14

Source: GAO survey of state testing directors.

*We also surveyed states to determine the extent to which they incorporated leading practices in computer-based testing. According to our survey, 28 states reported administering computer-based tests. Therefore, we report the results of that category separately later in this report.
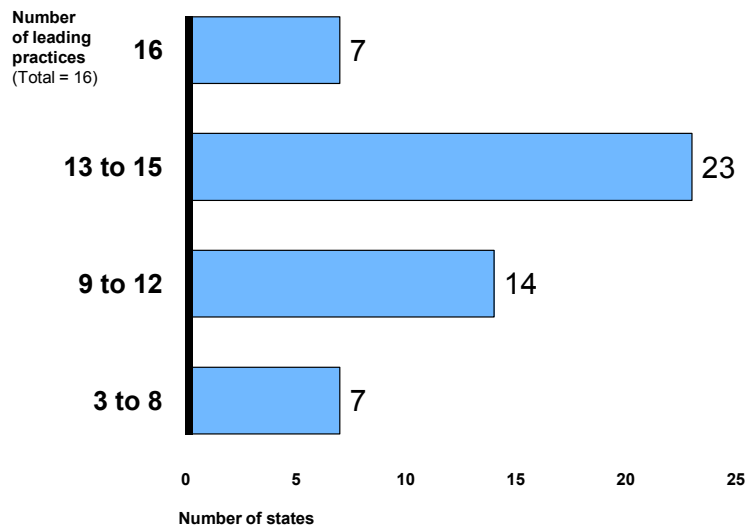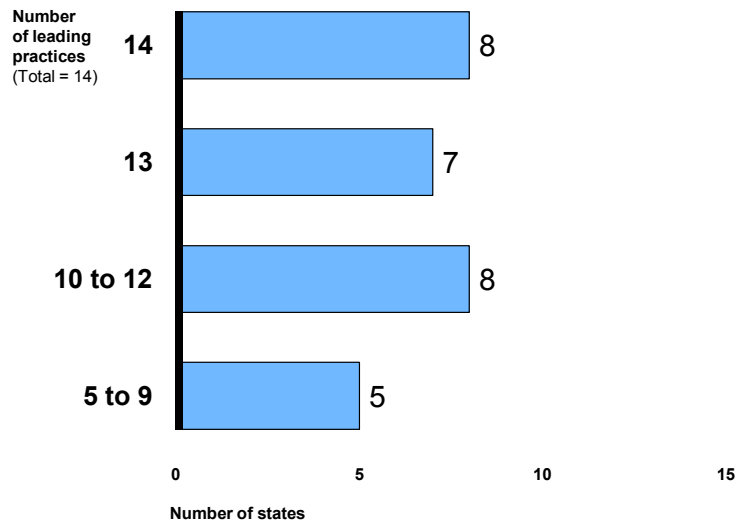
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Finding 1: Leading Practices – Test Security Plans
Extent of leading practices included in test security policies and procedures varied

- Leading practices for test security plans include having procedures for keeping testing facilities and materials secure, and methods of transferring hard copies of testing materials.

- Fourteen states reported having all (9 of 9) of the leading practices in this category.

- Additionally, within this category all 51 states reported having requirements for the security of testing materials.

Figure 2: Number of states that reported having various numbers of leading practices within the security plans category

Number of leading practices (Total = 9)

Number of leading practices	Number of states
9	14
8	18
7	8
6	8
5	3

Number of states

Source: GAO survey of state testing directors.

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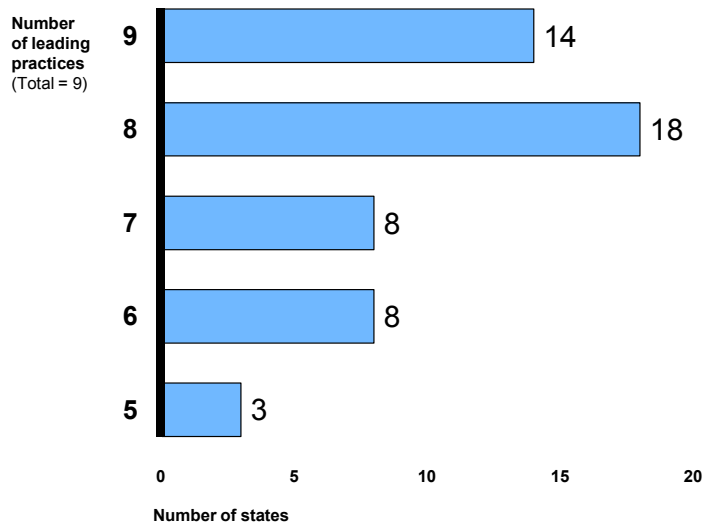
Finding 1: Leading Practices – Security Training

Extent of leading practices included in test security policies and procedures varied

- Security training leading practices include the development of training materials and conducting training on test security.

- Twenty-two states reported having all (11 of 11) of the leading practices in this category.

- However, four states reported not having any of the leading practices in the security training category.

Figure 3: Number of states that reported having various numbers of leading practices within the security training category

Number of leading practices (Total = 11)

Number of leading practices	Number of states
11	22
10	10
8 or 9	11
6 or 7	4
None	4

Number of states

Source: GAO survey of state testing directors.

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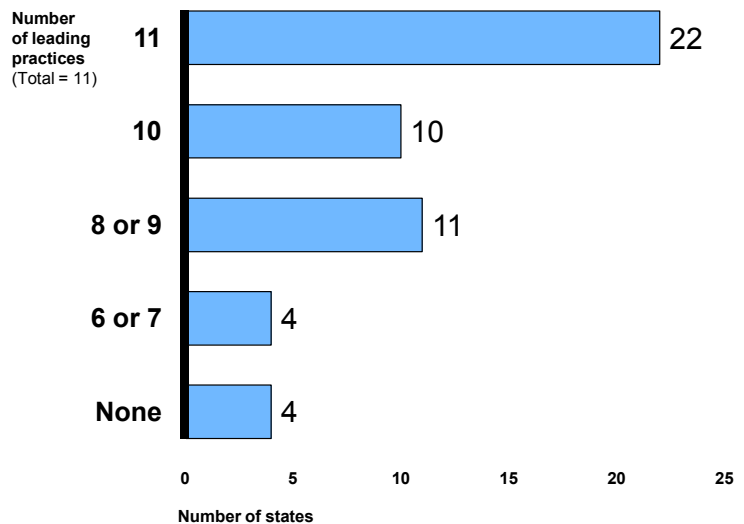
Finding 1: Leading Practices – Security Breaches
Extent of leading practices included in test security policies and procedures varied

- Leading practices for dealing with security breaches include procedures to prevent potential breaches—such as coaching or altering test responses— and steps to take if they occur, including consequences for individuals responsible for the breach.

- Twenty-four states reported having all (6 of 6) of the leading practices in this category.

- Three states reported not having any of the leading practices in the security breaches category.

Figure 4: Number of states that reported having various numbers of leading practices within the security breaches category

Source: GAO survey of state testing directors.

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Finding 1: Leading Practices – Test Administration

Extent of leading practices included in test security policies and procedures varied

- Leading practices in test administration include procedures for securing the testing environment and preventing or managing possible testing irregularities, among other things.

- Most states reported having over half of the 32 leading practices in this category.

- However, within this category, only eight states reported having requirements for recording seating chart information, and only six states reported having requirements that teachers not proctor their own classrooms during statewide tests.

Figure 5: Number of states that reported having various numbers of leading practices within the test administration category

Source: GAO survey of state testing directors.

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Finding 1: Leading Practices – Protecting Secure Materials
Extent of leading practices included in test security policies and procedures varied

- Leading practices for protecting secure materials include procedures to account for and protect secure materials at all stages of distribution, receipt, storage and return.

- Seven states reported having all (16 of 16) of the leading practices in this category.

- However, fewer than half of the states reported having procedures for physical access controls (20 states) and visitor policy regulations (25 states).

Figure 6: Number of states that reported having various numbers of leading practices within the protecting secure materials category

Number of leading practices (Total = 16)

Number of states

Source: GAO survey of state testing directors.

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Finding 1: Leading Practices – Computer-based Testing
Extent of leading practices included in test security policies and procedures varied

- Computer-based practices include requirements that clearly document and explain the use of any software, including supporting devices such as scanners.

- Of the 28 states that reported administering computer-based tests, eight states reported having all (14 of 14) of the leading practices in this category; 19 of the remaining 20 states reported having over half of the practices, with Kansas the only exception.

- By the 2014-15 school year, 47 states are currently expected to be using computer-based assessments.*

Figure 7: Number of states that reported having various numbers of leading practices within the computer-based testing category

Number of leading practices (Total = 14)

Number of leading practices	Number of states
14	8
13	7
10 to 12	8
5 to 9	5

Number of states

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Finding 1: Leading Practices (cont.)
Regardless of security practices, states feel vulnerable to cheating

- Despite having a variety of policies and procedures to mitigate testing irregularities, many state officials reported feeling vulnerable to cheating at some point during the testing process.*

Figure 8: Number of states that reported being vulnerable during various stages of testing
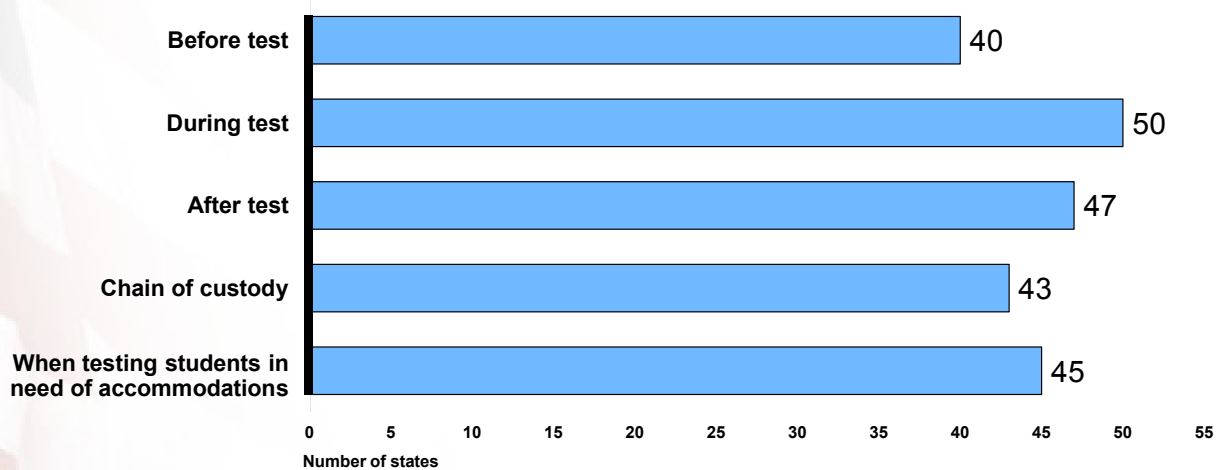
Source: GAO survey of state testing directors.
*This figure includes states responding that they felt "somewhat vulnerable"; "moderately vulnerable"; "very vulnerable"; or "extremely vulnerable" to cheating.

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Finding 2: State Oversight
States used a variety of tools to oversee test security and identify cheating

States reported using several oversight tools to ensure that school districts are following test security policies and procedures. As a result of these oversight activities, 32 states reported voiding test scores because of suspected or confirmed instances of cheating by school officials in the past two school years.

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Finding 2: State Oversight
States used a variety of tools to oversee test security and identify cheating

- State officials reported that they use a number of different oversight tools to ensure districts are following test security policies and procedures.

Figure 9: Number of states (out of 51, including the District of Columbia) reporting that they used these tools to ensure that school districts and schools were following test security policies and procedures
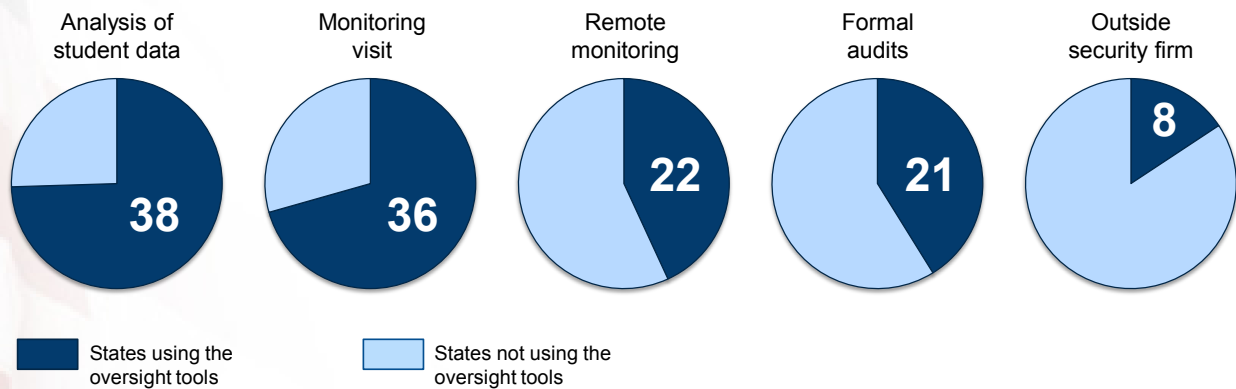
Analysis of student data	Monitoring visit	Remote monitoring	Formal audits	Outside security firm
38	36	22	21	8

■ States using the oversight tools

□ States not using the oversight tools

Source: GAO survey of state testing directors.

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Finding 2: State Oversight (cont.)
States used a variety of tools to oversee test security and identify cheating

- State officials reported that, during the past two school years, they detected potential cheating as a result of the following state oversight activities.

Figure 10: Number of states (out of 51, including the District of Columbia) reporting that they used these activities to detect reports of cheating in school years 2010-11 and 2011-12
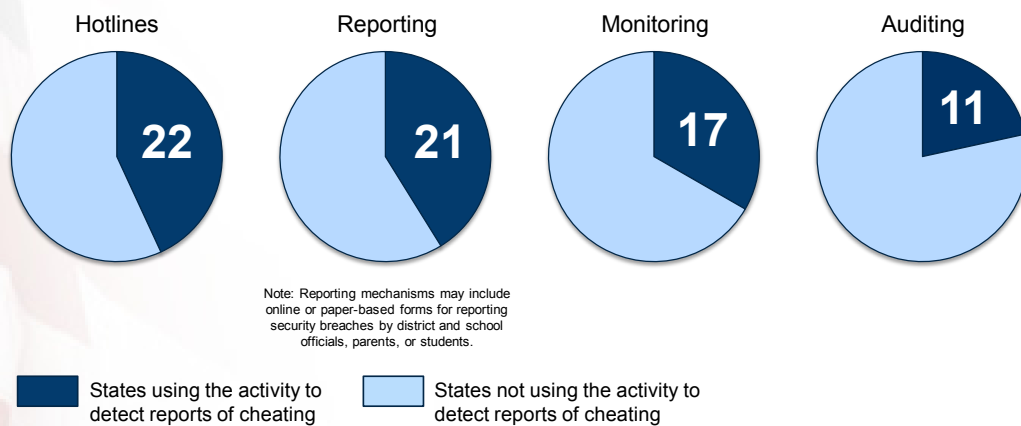
Hotlines	Reporting	Monitoring	Auditing
22	21	17	11

Note: Reporting mechanisms may include online or paper-based forms for reporting security breaches by district and school officials, parents, or students.

■ States using the activity to detect reports of cheating   ☐ States not using the activity to detect reports of cheating

Source: GAO survey of state testing directors.

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Finding 2: State Oversight (cont.)
States used a variety of tools to oversee test security and identify cheating

- Our analysis found that states also use statistical analysis of assessment data to identify suspicious patterns of scores at the classroom, grade, school, or district level that are highly unlikely and may suggest cheating.*

- Officials from 37 states reported that they conducted formal statistical analyses to detect indications of cheating for the 2011-2012 testing cycle.

  - For example, 33 states reported using **erasure analysis**, which usually focuses on the number or proportion of answers that were changed from wrong to right.

  - Twenty-eight states reported using **gain or loss score analysis,** which considers whether average test score improvements are unusual relative to the average improvement in similar classrooms or grades.

*These methods alone cannot verify whether cheating occurred. They can, however, inform future investigations or corroborate other reports of teachers or administrators cheating.

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Finding 2: State Oversight (cont.)
States used a variety of tools to oversee test security and identify cheating

- State officials reported using the results of the statistical analyses to:
  - inform training on assessment security (34 states),
  - conduct investigations in schools (34 states),
  - select districts or schools for monitoring visits (28 states), and
  - make changes to state assessment security policies (26 states).

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Finding 2: State Oversight (cont.)
States used a variety of tools to oversee test security and identify cheating

- Forty states reported allegations of cheating by school officials in the past two school years. Of these, 33 states confirmed at least one instance of cheating.*

- Twenty-nine states reported allegations of cheating for school year 2011-12, and a similar number reported allegations of cheating in school year 2010-11.

*Allegations of cheating could include different numbers of individuals. For example, one allegation could cover one individual, multiple tests, grade levels, schools, or individuals.

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Finding 2: State Oversight (cont.)
States used a variety of tools to oversee test security and identify cheating

- In school years 2011-12 and 2010-11, 32 states reported canceling, invalidating, or nullifying test scores from individual students, schools, or districts because of suspected or confirmed cheating by school officials.

- Some state and school district officials we interviewed during our site visits reported that test scores could be voided due to cheating; districts may face corrective actions; and educators may face personnel actions, such as removal of teaching credentials.

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Finding 3: States' Sources of Assistance
States received assistance with test security, but seek additional support

States relied on several sources of support for assistance with test security issues and identified additional areas where assistance from Education would be useful. Subsequent to our survey, Education issued a report that discusses best practices and policies for testing integrity.

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Finding 3: States' Sources of Assistance
States received assistance with test security, but seek additional support

- States reported receiving assistance with assessment security from several sources, but most frequently from testing contractors.

Figure 11: Primary sources of information states rely on for assistance with test security issues
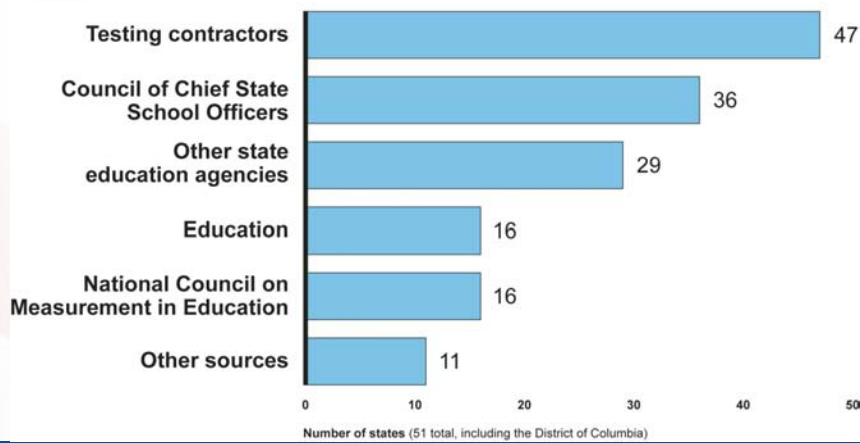
Source: GAO survey of state testing directors.

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Finding 3: States' Sources of Assistance (cont.)
States received assistance with test security, but seek additional support

- When asked in the survey—administered between November 2012 and January 2013—how Education could best serve the states, officials from the majority of states reported that it would be very or extremely useful if Education would:
  - gather information on best practices in test security (35 states), and
  - disseminate information on best practices (36 states).

- On February 12, 2013, Education released a report—consisting largely of the opinions of experts who responded to Education's request for information or presented at the Testing Integrity Symposium—discussing practices and policies related to four areas of testing integrity.

- Education stated that the document will be a starting point for further dialogue about the integrity of academic assessments.

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Finding 3: States' Sources of Assistance (cont.)
States received assistance with test security, but seek additional support

- State officials reported other areas, which were not discussed in Education's February 2013 report, where additional assistance would be useful:

  - Officials from 35 states said it would be very or extremely useful to have additional opportunities for state collaboration about assessment security issues.

  - Additionally, about one-third of the states reported that it would be very or extremely useful if Education provided assistance with drafting requests for proposals for testing vendors.

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Concluding Observations

As more information about leading practices in test security is developed and disseminated, states will have improved access to the tools they need to develop strong policies and procedures in test security, and reduce their vulnerability to cheating on assessments. In particular, as more states begin using computer-based assessments—which may address some vulnerabilities of paper-based assessments, but may also create new ones, such as computer security breaches—additional guidance and oversight will be key to ensuring that appropriate policies and procedures are adopted by schools to address these new vulnerabilities.

Although the risk of cheating on statewide assessments can never be completely eliminated, implementation of strong policies and procedures for preventing cheating, combined with robust oversight and detection by states, can greatly improve the integrity of test results. Without these measures, there is a higher risk that decisions based on test results may be faulty, and lead to damaging results, including failing to identify and provide resources for underperforming schools and students most in need of academic support.

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Table 1: Security Plans

	Rules for Storage of Testing Materials	Security of Testing Materials	Internet Connectivity Procedures	Methods of Electronic Transfer	Methods of Transfer for Hard Copies of Testing Materials	Procedures for Removal of Materials After Testing is Complete	Procedures to Keep Testing Facilities Secure	Test Item Release Process	Periodic Audits
AL	X	X		X	X	X	X	X	X
AK	X	X		X	X	X	X		
AZ	X	X	X	X	X	X	X	X	X
AR	X	X	X	X	X	X	X	X	X
CA	X	X		X	X	X	X	X	X
CO	X	X	X	X	X	X	X	X	X
CT	X	X	X		X	X	X	X	X
DC	X	X	X	X	X	X	X	X	X
DE	X	X	X	X	X	X	X	X	
FL	X	X	X	X	X	X	X		
GA	X	X	X	X	X	X	X	X	
HI		X	X	X	X		X	X	
ID	X	X	X		X	X	X		X
IL	X	X			X	X	X		X
IN	X	X	X	X	X	X	X	X	X
IA	X	X			X	X	X	X	X
KS	X	X	X	X	X	X		X	X
KY	X	X	X	X	X	X	X	X	X
LA	X	X	X	X	X	X	X	X	
ME	X	X	X	X	X	X	X	X	
MD	X	X	X	X	X	X	X	X	X
MA	X	X			X	X	X	X	X
MI	X	X			X	X	X		X
MN	X	X	X	X	X	X	X	X	X
MS	X	X		X	X	X	X		X
MO	X	X	X	X	X	X	X	X	X
MT	X	X	X	X	X	X	X	X	

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

Note: Cells marked with an "X" indicate that state officials responded "yes" to having the leading practice. Blank cells indicate that state officials did not respond, or responded "no" or "don't know."

	Rules for Storage of Testing Materials	Security of Testing Materials	Internet Connectivity Procedures	Methods of Electronic Transfer	Methods of Transfer for Hard Copies of Testing Materials	Procedures for Removal of Materials After Testing is Complete	Procedures to Keep Testing Facilities Secure	Test Item Release Process	Periodic Audits
NE	X	X	X	X	X	X	X	X	X
NV	X	X			X	X	X		
NH		X	X	X	X	X		X	X
NJ	X	X			X	X	X		X
NM	X	X		X	X	X	X	X	X
NY	X	X				X	X	X	X
NC	X	X	X	X	X	X	X	X	X
ND	X	X	X	X	X	X	X		X
OH	X	X			X	X		X	
OK	X	X	X	X	X	X	X	X	X
OR	X	X	X	X	X	X	X	X	
PA	X	X	X	X	X	X	X	X	X
RI	X	X	X			X	X	X	X
SC	X	X	X		X	X	X	X	X
SD	X	X		X	X	X	X		X
TN	X	X		X	X	X	X	X	X
TX	X	X	X	X	X	X	X	X	
UT	X	X	X	X	X	X	X	X	
VT	X	X	X	X	X	X	X	X	
VA	X	X	X	X	X	X	X	X	X
WA	X	X		X	X	X	X	X	X
WV	X	X	X	X	X	X			
WI	X	X			X	X	X	X	
WY	X	X			X	X		X	

Source: GAO survey of state testing directors.

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State
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Table 2: Training

Key

1. Reporting Test Administration Irregularities and Security Breaches
2. Handling Allowable Accommodations
3. Ensuring Test Security During All Stages of Administration
4. Documentation how the Assessment is to be Administered
5. Administering Test Under Normal Standardized Conditions
6. Dealing with Cases Involving Expected Collusion Between Adults
7. A Process for Addressing Unforeseen Difficulties with Test Administration
8. Answering Student Questions About the Assessment
9. Allowing Student Activities After Completing the Assessment if Students are Still Engaged in the Assessment
10. Standards for Triggering An Investigation
11. Protocols for Conducting An Investigation

	1	2	3	4	5	6	7	8	9	10	11
AL	X	X	X	X	X	X	X	X	X	X	X
AK	X	X	X	X	X	X	X	X	X	X	X
AZ	X	X	X	X	X	X	X	X	X	X	X
AR	X	X	X	X	X		X	X	X		
CA	X	X	X	X	X	X	X	X	X	X	X
CO	X	X	X	X	X		X	X	X	X	X
CT	X	X	X		X		X	X	X	X	
DC	X	X	X	X	X	X	X	X	X	X	X
DE	X	X	X		X	X	X	X	X	X	X
FL	X	X	X	X	X	X	X	X	X	X	X
GA	X	X	X	X	X	X	X	X	X	X	X
HI	X	X	X	X	X		X	X	X	X	X
ID		X	X	X	X	X	X	X	X	X	X
IL	X	X	X	X	X		X	X	X	X	X
IN	X	X	X	X	X		X	X		X	X
IA											
KS	X	X	X	X	X					X	
KY	X	X	X	X	X	X	X	X	X	X	X
LA											
ME	X	X	X	X	X	X	X	X	X	X	X
MD	X	X	X				X	X	X		X	X

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

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10. Standards for Triggering An Investigation
11. Protocols for Conducting An Investigation

	1	2	3	4	5	6	7	8	9	10	11
MA	X	X	X	X	X		X	X	X	X	X
MI	X		X	X	X		X		X		
MN											
MS	X	X	X	X	X	X	X	X	X	X	X
MO	X	X	X	X	X		X	X	X		
MT	X	X		X	X	X	X		X	X	X
NE	X	X	X	X	X	X	X	X	X		X
NV	X	X	X	X	X	X	X	X	X	X	X
NH	X	X	X	X	X	X	X	X	X	X	
NJ	X	X	X	X	X		X		X		X
NM	X	X	X	X	X	X	X	X	X	X	X
NY	X	X	X	X	X	X	X	X	X	X	X
NC	X	X	X	X	X	X	X	X	X	X	X
ND	X	X	X	X	X			X			
OH											
OK	X		X	X	X		X	X	X	X	
OR	X	X	X	X	X	X	X	X	X	X	X
PA	X	X	X	X	X	X	X	X	X	X	X
RI	X	X	X	X	X		X	X	X		
SC	X	X	X	X	X	X	X	X	X	X	X
SD	X	X	X	X	X		X	X	X		X
TN	X	X	X	X	X	X	X	X	X	X	X
TX	X	X	X	X	X	X	X	X	X	X	X
UT	X	X	X	X	X	X	X	X	X	X	X
VT	X	X	X	X	X	X	X	X	X	X	
VA	X	X	X	X	X	X	X	X	X	X	X

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

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10. Standards for Triggering An Investigation
11. Protocols for Conducting An Investigation

	1	2	3	4	5	6	7	8	9	10	11
WA	X	X	X	X	X		X	X	X	X	X
WV	X	X	X	X	X		X		X	X	X
WI	X	X	X	X	X	X	X	X	X	X	X
WY	X	X	X	X	X		X	X			

Source: GAO survey of state testing directors.

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

Note: Cells marked with an "X" indicate that state officials responded "yes" to having the leading practice. Blank cells indicate that state officials did not respond, or responded "no" or "don't know."

Table 3: Security Breaches

	Procedures to Prevent Potential Security Breaches	A Recovery Plan for how to Mitigate a Security Breach	Information on Potential Consequences to Individual(s) Responsible for the Breach	Procedures to be Invoked if Security Breaches Occur that Jeopardize Integrity of Student Test Score Results	Development of a Form for Documenting Breaches	A Communications Plan for All Stakeholders to Follow if a Breach Occurs
AL	X	X	X	X	X	X
AK	X	X	X	X	X	X
AZ	X		X	X	X	X
AR	X		X	X		
CA	X	X	X	X	X	X
CO	X	X	X	X	X	
CT	X	X	X	X	X	
DC	X	X	X	X	X	X
DE	X		X	X	X	X
FL	X	X	X	X	X	X
GA	X	X	X	X	X	X
HI	X	X	X	X	X	X
ID	X		X	X	X	X
IL	X		X	X	X	
IN	X	X	X	X	X	
IA	X	X	X	X	X	
KS	X	X	X	X		X
KY	X	X	X	X	X	X
LA	X	X	X	X	X	X
ME	X	X	X	X	X	
MD	X	X	X	X	X	X
MA	X	X	X	X		X
MI	X	X		X	X	
MN	X	X		X	X	X
MS	X		X	X		X
MO						

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

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	Procedures to Prevent Potential Security Breaches	A Recovery Plan for how to Mitigate a Security Breach	Information on Potential Consequences to Individual(s) Responsible for the Breach	Procedures to be Invoked if Security Breaches Occur that Jeopardize Integrity of Student Test Score Results	Development of a Form for Documenting Breaches	A Communications Plan for All Stakeholders to Follow if a Breach Occurs
MT	X	X	X	X	X	X
NE	X	X	X	X	X	X
NV	X	X	X	X	X	X
NH		X				
NJ	X	X	X	X	X	X
NM	X	X	X	X	X	X
NY	X		X	X	X	
NC	X	X	X	X	X	X
ND	X		X	X	X	X
OH	X	X	X	X	X	X
OK	X	X	X	X	X	X
OR	X	X	X	X	X	X
PA	X		X	X	X	X
RI	X	X	X	X	X	
SC	X	X	X	X	X	X
SD	X		X	X	X	X
TN	X	X	X	X	X	X
TX	X	X	X	X	X	X
UT						
VT	X	X	X	X		X
VA	X	X	X	X	X	X
WA	X	X	X	X	X	X
WV	X		X	X	X	X
WI	X	X	X	X		X
WY						

Source: GAO survey of state testing directors.

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Note: Cells marked with an "X" indicate that state officials responded "yes" to having the leading practice. Blank cells indicate that state officials did not respond, or responded "no" or "don't know."

Table 4: Test Administration

Key

1. Procedures for Proper Handling of Secure Materials
2. Procedures for Secure Storage of Materials Prior to Test Administration
3. Procedures for Secure Storage of Materials During the Test
4. Procedures for Secure Storage of Materials After the Test
5. Procedures for Proper Handling of Tests Given with Accommodations and/or in Alternate Assessment Formats
6. Requirements to Obtain Confidentiality Agreements/Oaths from Proctors and/or Administrators
7. Rules and Procedures to Prevent/Respond to Instances of Test Administration Irregularities and/or Cheating
8. Requirements that Teachers Not Proctor their Own Classrooms for Statewide Tests
9. Identification of a Test Administrator to Student Ratio
10. Identification of Rooms for Administration and Their Requirements
11. Identification of Allowable and Expressly Prohibited Materials
12. Roles and Responsibilities for Assessment Proctors
13. An Overview of State Assessment Program, including laws and regulations
14. General Information About Particular Assessments
15. Ethical Practices
16. Regulations or Codes
17. Roles and Responsibilities of District and School Staff
18. Process for Determining Accommodations
19. Participation Requirements for Students in the Assessment Program
20. General Administration Guidance
21. Provision of Accurate Student Information and Demographics
22. Reports Available Following Test Administration
23. Necessary Forms for the Assessment Program
24. Information on School Security Breaches or Test Irregularities
25. Procedures for Administration of Alternate Assessments
26. Procedures for Ordering Additional Materials
27. Preparation of Testing Sites
28. Secure Distribution of Test Materials
29. Maintaining a Secure Inventory of Returned Test Materials
30. Procedures for Returning Test Materials to the Service Provider
31. Forms Used During Test Administration
32. Recording Seating Chart Information

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
AL	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
AK	X	X		X	X	X	X	X																								
AZ	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
AR	X	X	X	X	X	X	X		X		X	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	
CA	X	X	X	X	X	X	X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CO	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CT	X	X	X	X	X					X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
DC	X	X	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
DE	X	X			X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X			X	X	X	X	X	
FL	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X
GA	X	X	X	X	X		X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
HI	X	X	X	X	X		X																									

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2. Procedures for Secure Storage of Materials Prior to Test Administration
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4. Procedures for Secure Storage of Materials After the Test
5. Procedures for Proper Handling of Tests Given with Accommodations and/or in Alternate Assessment Formats
6. Requirements to Obtain Confidentiality Agreements/Oaths from Proctors and/or Administrators
7. Rules and Procedures to Prevent/Respond to Instances of Test Administration Irregularities and/or Cheating
8. Requirements that Teachers Not Proctor their Own Classrooms for Statewide Tests
9. Identification of a Test Administrator to Student Ratio
10. Identification of Rooms for Administration and Their Requirements
11. Identification of Allowable and Expressly Prohibited Materials
12. Roles and Responsibilities for Assessment Proctors
13. An Overview of State Assessment Program, including laws and regulations
14. General Information About Particular Assessments
15. Ethical Practices

16. Regulations or Codes
17. Roles and Responsibilities of District and School Staff
18. Process for Determining Accommodations
19. Participation Requirements for Students in the Assessment Program
20. General Administration Guidance
21. Provision of Accurate Student Information and Demographics
22. Reports Available Following Test Administration
23. Necessary Forms for the Assessment Program
24. Information on School Security Breaches or Test Irregularities
25. Procedures for Administration of Alternate Assessments
26. Procedures for Ordering Additional Materials
27. Preparation of Testing Sites
28. Secure Distribution of Test Materials
29. Maintaining a Secure Inventory of Returned Test Materials
30. Procedures for Returning Test Materials to the Service Provider
31. Forms Used During Test Administration
32. Recording Seating Chart Information

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
ID	X	X	X	X	X	X	X			X	X	X	X	X	X	X	X	X	X	X	X	X			X	X	X	X	X	X	X	
IL	X	X	X	X	X		X				X	X	X	X	X	X	X	X	X	X			X	X	X	X	X	X	X	X	X	X
IN	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X		X	X	X	X			X	X	X	X
IA	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
KS	X	X	X	X	X	X	X			X	X		X	X	X	X	X	X	X	X			X	X	X	X	X	X	X	X	X	X
KY	X	X	X	X	X	X	X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
LA	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ME	X	X	X	X	X	X	X			X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MD	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MA	X	X		X	X	X	X				X	X	X	X	X	X		X	X	X	X		X	X	X	X	X	X	X	X	X	X
MI	X	X	X	X	X	X	X				X	X	X		X	X	X		X	X	X				X	X	X	X	X	X	X	X
MN	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MS	X	X	X	X	X	X	X	X			X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MO	X	X	X	X	X		X				X	X	X	X		X	X	X			X	X	X	X	X	X	X	X	X	X	X	
MT											X	X		X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
NE	X	X	X	X	X	X	X	X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

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10. Identification of Rooms for Administration and Their Requirements
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13. An Overview of State Assessment Program, including laws and regulations
14. General Information About Particular Assessments
15. Ethical Practices
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28. Secure Distribution of Test Materials
29. Maintaining a Secure Inventory of Returned Test Materials
30. Procedures for Returning Test Materials to the Service Provider
31. Forms Used During Test Administration
32. Recording Seating Chart Information

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
NV	X	X	X	X	X		X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
NH	X	X	X	X	X	X	X				X	X		X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
NJ	X	X	X	X	X	X	X					X																				
NM	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
NY	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
NC	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ND	X	X	X	X	X	X	X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
OH	X	X	X	X	X		X		X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
OK	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			X	X			X	X		X	X
OR	X	X	X	X	X	X		X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				X	X
PA	X	X	X	X	X	X	X	X			X	X	X	X	X		X	X	X	X	X		X	X	X	X	X	X	X	X	X	X
RI											X	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X		X	X
SC	X	X	X	X	X	X	X				X	X	X	X	X	X		X	X	X	X		X	X	X	X	X	X	X	X	X	X
SD									X	X												X	X	X	X	X	X			X	X	
TN	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X		X	X	X	X		X		X	X	X
TX	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

Note: Cells marked with an "X" indicate that state officials responded "yes" to having the leading practice. Blank cells indicate that state officials did not respond, or responded "no" or "don't know."

1. Procedures for Proper Handling of Secure Materials
2. Procedures for Secure Storage of Materials Prior to Test Administration
3. Procedures for Secure Storage of Materials During the Test
4. Procedures for Secure Storage of Materials After the Test
5. Procedures for Proper Handling of Tests Given with Accommodations and/or in Alternate Assessment Formats
6. Requirements to Obtain Confidentiality Agreements/Oaths from Proctors and/or Administrators
7. Rules and Procedures to Prevent/Respond to Instances of Test Administration Irregularities and/or Cheating
8. Requirements that Teachers Not Proctor their Own Classrooms for Statewide Tests
9. Identification of a Test Administrator to Student Ratio
10. Identification of Rooms for Administration and Their Requirements
11. Identification of Allowable and Expressly Prohibited Materials
12. Roles and Responsibilities for Assessment Proctors
13. An Overview of State Assessment Program, including laws and regulations
14. General Information About Particular Assessments
15. Ethical Practices

16. Regulations or Codes
17. Roles and Responsibilities of District and School Staff
18. Process for Determining Accommodations
19. Participation Requirements for Students in the Assessment Program
20. General Administration Guidance
21. Provision of Accurate Student Information and Demographics
22. Reports Available Following Test Administration
23. Necessary Forms for the Assessment Program
24. Information on School Security Breaches or Test Irregularities
25. Procedures for Administration of Alternate Assessments
26. Procedures for Ordering Additional Materials
27. Preparation of Testing Sites
28. Secure Distribution of Test Materials
29. Maintaining a Secure Inventory of Returned Test Materials
30. Procedures for Returning Test Materials to the Service Provider
31. Forms Used During Test Administration
32. Recording Seating Chart Information

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
UT	X	X	X	X	X		X			X	X	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X
VT	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
VA	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WA	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WV	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WI	X	X	X	X	X	X	X				X	X	X	X	X		X	X	X	X	X	X	X	X	X		X	X	X	X		
WY	X	X	X	X	X	X	X				X	X		X	X			X	X	X	X	X	X		X	X	X	X	X	X	X	X

Source: GAO survey of state testing directors.

Table 5: Protecting Secure Materials

Key

	Procedures to Keep Facilities Secure	Chain of Custody Procedures
1. Procedures on how Security Issues should be Managed at State and Local Levels 2. Chain of Custody Procedures for Tracking all Secure Test Materials 3. Established and Documented Destination for Distribution 4. Plan to Account for and Return all Secure Materials 5. Plan for Secure Material's Disposition and Salvage 6. Procedures Describing What to Do when Test Materials are Missing	7. Physical Access Controls 8. Visitor Policy Regulations 9. Security System for Online Security 10. Procedures for Online Security	11. Procedures for the Handoff of Materials 12. Process to Request Additional Materials 13. Procedures Describing What to Do when Materials are Missing 14. Instructions on Reassembling Scorable and Secure Materials 15. Instructions on Shipping Materials to the Service Provider 16. Procedures for Recovering Materials Provided by the Client and Service Provider

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
AL	X	X	X	X	X	X	X	X			X	X	X	X	X	X
AK	X	X	X		X	X					X	X	X	X	X	X
AZ	X	X	X	X	X	X	X				X	X	X	X	X	X
AR	X	X	X	X	X	X			X	X	X	X	X	X	X	X
CA	X	X	X	X	X	X	X	X	X	X						
CO	X	X	X	X	X			X			X	X	X	X	X	
CT	X	X	X	X		X			X	X						
DC	X	X	X	X	X	X	X	X			X	X	X	X	X	X
DE	X	X		X		X		X	X	X	X	X	X	X		X
FL	X	X	X	X	X	X			X	X	X	X	X	X	X	
GA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
HI	X	X	X	X	X	X		X	X	X						
ID	X	X	X	X	X	X			X	X	X	X	X	X	X	X
IL	X	X		X	X											
IN	X	X	X	X	X	X			X	X	X	X	X	X	X	X
IA	X	X	X	X	X	X	X	X			X	X	X	X	X	X
KS	X										X	X				
KY		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
LA	X	X	X	X	X	X	X		X	X						
ME	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X

GAO-13-495R Test Security Leading Practices

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

Note: Cells marked with an "X" indicate that state officials responded "yes" to having the leading practice. Blank cells indicate that state officials did not respond, or responded "no" or "don't know."

							Procedures to Keep Facilities Secure				Chain of Custody Procedures					

1. Procedures on how Security Issues should be Managed at State and Local Levels
2. Chain of Custody Procedures for Tracking all Secure Test Materials
3. Established and Documented Destination for Distribution
4. Plan to Account for and Return all Secure Materials
5. Plan for Secure Material's Disposition and Salvage
6. Procedures Describing What to Do when Test Materials are Missing

7. Physical Access Controls
8. Visitor Policy Regulations
9. Security System for Online Security
10. Procedures for Online Security

11. Procedures for the Handoff of Materials
12. Process to Request Additional Materials
13. Procedures Describing What to Do when Materials are Missing
14. Instructions on Reassembling Scorable and Secure Materials
15. Instructions on Shipping Materials to the Service Provider
16. Procedures for Recovering Materials Provided by the Client and Service Provider

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
MD	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MA	X	X	X	X	X	X		X			X	X	X	X	X	X
MI	X	X	X	X	X	X		X	X	X	X	X	X	X	X	
MN	X	X	X	X	X	X		X	X	X	X	X	X	X	X	
MS	X	X	X	X	X	X		X		X	X	X	X	X	X	X
MO	X	X	X	X	X	X			X	X	X	X	X	X	X	X
MT	X	X	X	X	X	X			X	X						
NE	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X
NV	X	X	X	X	X	X	X	X			X	X	X	X	X	X
NH	X		X	X	X	X										
NJ	X	X	X	X	X	X	X				X	X	X	X	X	X
NM	X	X	X	X	X	X	X	X			X	X	X	X		X
NY	X	X	X	X	X	X					X	X	X	X	X	X
NC	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ND	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
OH	X	X	X	X	X	X					X	X	X	X	X	X
OK	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
OR	X	X	X	X	X	X	X	X	X	X	X	X			X	X
PA	X	X	X	X	X	X			X	X		X	X	X	X	X
RI	X	X		X	X	X				X		X	X		X	X
SC	X	X	X	X		X					X	X	X		X	
SD	X		X	X	X	X	X					X	X		X	X
TN	X	X	X	X	X	X	X				X	X	X	X	X	

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

Note: Cells marked with an "X" indicate that state officials responded "yes" to having the leading practice. Blank cells indicate that state officials did not respond, or responded "no" or "don't know."

							Procedures to Keep Facilities Secure				Chain of Custody Procedures					

1. Procedures on how Security Issues should be Managed at State and Local Levels
2. Chain of Custody Procedures for Tracking all Secure Test Materials
3. Established and Documented Destination for Distribution
4. Plan to Account for and Return all Secure Materials
5. Plan for Secure Material's Disposition and Salvage
6. Procedures Describing What to Do when Test Materials are Missing

7. Physical Access Controls
8. Visitor Policy Regulations
9. Security System for Online Security
10. Procedures for Online Security

11. Procedures for the Handoff of Materials
12. Process to Request Additional Materials
13. Procedures Describing What to Do when Materials are Missing
14. Instructions on Reassembling Scorable and Secure Materials
15. Instructions on Shipping Materials to the Service Provider
16. Procedures for Recovering Materials Provided by the Client and Service Provider

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
TX	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
UT	X	X	X	X	X	X			X	X	X	X	X	X	X	
VT	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X
VA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WA	X	X	X	X	X	X					X	X	X	X	X	X
WV	X	X	X	X	X	X					X	X	X	X	X	X
WI	X			X	X	X										
WY	X		X	X	X	X										

Source: GAO survey of state testing directors.

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State
Note: Cells marked with an "X" indicate that state officials responded "yes" to having the leading practice. Blank cells indicate that state officials did not respond, or responded "no" or "don't know."

Table 6: Computer-Based

Key

Protocols				Secure electronic transfer		Requirements				Maintaining Security of online environment			Training
1. Limited Internet Access 2. Logs to Monitor Access 3. Checking for Other Devices 4. Identity Checks/Seating Charts				5. Encrypted Data Exchange 6. Secure FTP Sites		7. Use of Software 8. Minimum Technology Infrastructure 9. Infrastructure Readiness 10. Security of Online Environment				11. Locking Down Computer 12. Securing Cell Phones and Other Devices 13. Establish Security Codes			14. Specific Written Training Procedures
1	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**
AR	X	X	X		X	X	X	X	X	X	X	X	X	X
CT	X					X		X	X	X	X	X	X	
DE	X	X	X	X	X	X	X	X	X		X	X	X	X
FL	X	X	X	X	X	X	X	X	X	X	X	X	X	X
GA	X	X	X	X	X	X	X	X	X	X	X	X	X	X
HI	X	X	X		X	X	X	X	X		X	X	X	X
ID	X		X					X	X	X	X	X	X	X
IN	X	X	X		X			X	X		X	X	X	X
KS					X	X		X					X	X
KY	X		X	X				X	X	X		X	X	X
LA	X	X			X	X		X	X	X	X	X	X	X
MD	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MN	X	X	X	X	X	X		X	X	X	X	X		X
MS	X	X	X	X	X	X	X	X		X	X	X	X	X
MO	X		X		X	X		X	X		X	X	X	X
NE	X	X	X	X	X	X	X	X	X	X	X	X	X	X
NC	X	X	X		X	X	X	X	X	X	X	X	X	X
ND		X	X	X		X		X		X	X	X	X	X
OK	X	X	X	X	X	X	X	X	X	X	X	X	X	X
OR	X		X	X	X	X	X	X	X	X		X	X	X
PA	X	X	X		X	X	X	X	X		X	X	X	X
SC	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Enclosure II: Leading Practices Included in Policies and Procedures by Category Reported by Each State

Note: Cells marked with an "X" indicate that state officials responded "yes" to having the leading practice. Blank cells indicate that state officials did not respond, or responded "no" or "don't know."

Protocols				Secure electronic transfer		Requirements				Maintaining Security of online environment			Training
1. Limited Internet Access 2. Logs to Monitor Access 3. Checking for Other Devices 4. Identity Checks/Seating Charts				5. Encrypted Data Exchange 6. Secure FTP Sites		7. Use of Software 8. Minimum Technology Infrastructure 9. Infrastructure Readiness 10. Security of Online Environment				11. Locking Down Computer 12. Securing Cell Phones and Other Devices 13. Establish Security Codes			14. Specific Written Training Procedures
1	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**
TX	X	X	X	X	X	X	X	X	X	X	X	X	X
UT	X	X	X	X	X	X	X	X	X	X		X	X
VT	X		X		X	X		X	X		X		X
VA	X	X	X		X	X	X	X	X	X	X	X	X
WA	X	X	X	X	X	X	X	X	X	X	X	X		X
WV	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Source: GAO survey of state testing directors.

Note: Officials from the 28 states listed in this table reported administering computer-based statewide assessments. Therefore, we only report the responses of those 28 states for the computer-based category of leading practices.

Enclosure III: Comments from the U.S. Department of Education

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

WASHINGTON, D.C. 20202

THE ASSISTANT SECRETARY

May 8, 2013

Ms. Linda M. Calbom
Western Regional Director
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Calbom:

I am writing to provide comments on the U.S. Government Accountability Office's (GAO) draft document titled "K-12 Education: States' Test Security Policies and Procedures Varied" (GAO-13-495R). We are generally pleased with GAO's work on this important topic of test security and integrity and the efforts that many State and local governments are making on this important subject. We are gratified that the draft report recognizes the important efforts of the Department in convening a symposium on test integrity and in providing a follow-up report on best practices and policies.

There is still more work to do in this area, especially as new assessments aligned with college- and career-ready standards are developed and implemented. We will continue to work with State and local governments to share new developments, best practices, and improved processes in this area in order to reinforce the importance and increase awareness of test security and integrity.

We appreciate the opportunity to comment on this document.

Sincerely,

Deborah S. Delisle

www.ed.gov

400 MARYLAND AVE., SW, WASHINGTON, DC 20202

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

(131159)

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