



John Keel, CPA
State Auditor

An Audit Report on

The Texas Education Agency's Public Education Accountability Information

August 2007
Report No. 07-045



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Overall Conclusion

The Texas Education Agency's (Agency) processes and controls provide reasonable assurance that school accountability ratings are accurately calculated and reported. The Agency relies on the state's 1,227 districts to submit accurate student data. Also, a sample of accountability data for three campuses that were upgraded from "academically unacceptable" in 2005 to "academically acceptable" in 2006 was substantially accurate.

The Agency uses student demographic data submitted by school districts and testing results provided by its testing vendor to calculate accountability ratings for district and campus performance. The test results are reported for all students and ethnic and economic status groups. Incorrect classification of ethnicity and economic status by a district could affect the Agency's calculation of accountability ratings (see text box for additional information on accountability ratings).

While auditors identified a number of errors in demographic data at the 14 campuses visited, the errors did not affect the campuses' accountability ratings. Errors identified occurred because campuses did not have sufficient documentation to support how students were classified or because districts incorrectly coded student answer documents.

In fiscal year 2003, the Agency changed its monitoring program for accountability data. The Agency has not fully implemented these monitoring changes, such as following up with districts that have the least serious data quality issues. Once the planned changes are fully implemented, the Agency could further improve its monitoring process by performing additional data analysis to identify data irregularities and by conducting additional follow-up at districts that have less serious data quality issues to ensure errors are addressed at all districts.

2006 Accountability Ratings

There are four possible accountability ratings for school districts and campuses: exemplary, recognized, academically acceptable, or academically unacceptable.

The Texas Education Agency (Agency) determines the accountability rating by evaluating district and campus performance on four base indicators:

- Performance on the Texas Assessment of Knowledge and Skills (TAKS).
- Performance on the State-Developed Alternative Assessment II (SDAAII).
- Completion rate.
- Annual dropout rate.

The Agency evaluates performance on TAKS, completion rate, and annual dropout rate for all students and the following student groups: African American, Hispanic, white, and economically disadvantaged.

Summary of Management's Response

The Agency generally agrees with the recommendations.

Summary of Information Technology Review

The Agency uses data from two sources to obtain source data for the accountability ratings: the Public Education Information Management System (PEIMS) and the Student Assessment Database. The testing results data received from the testing vendor is transmitted to the Student Assessment Database. Verification of the testing results provided by the testing vendor was not included in this audit. The audit included a review of the controls in place to calculate the accountability ratings and access controls regarding the transmission of data between systems. No significant errors were identified.

Summary of Objectives, Scope, and Methodology

The objectives of this audit were to:

- Determine whether selected processes and controls at the Agency provide reasonable assurance of the accuracy of accountability data.
- Verify the accuracy of selected accountability data for campuses that have been upgraded from an "academically unacceptable" accountability rating to an "academically acceptable" accountability rating.

The scope of this audit covered campus, district, and state accountability data from the 2003-2004 school year through the 2005-2006 school year. The audit included a review of supporting documentation for student demographic information and any documentation related to exemptions from the Texas Assessment of Knowledge and Skills (TAKS) tests. The audit did not include verification of testing results provided by the Agency's testing vendor.

The methodology included analysis of district and campus accountability ratings calculated for 2005 and 2006 and review of supporting documentation for the 2005-2006 school year for a sample of students at 14 campuses visited. Auditors visited one additional campus during the planning phase of the audit to better understand the processes used at the campus and district level. Auditors also reviewed 2005-2006 and 2006-2007 school year documentation provided by districts to address the potential data quality issues identified by the Agency's monitoring program.

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Detailed Results

Chapter 1

The Agency's Processes and Controls Provide Reasonable Assurance That Accountability Ratings Are Accurately Calculated and Reported

Chapter 1-A

The Agency's Processes and Controls for the Accountability System Are Adequate

The Texas Education Agency (Agency) has adequate processes and controls in place to accurately calculate and report accountability ratings using data submitted by the 1,227 districts (194 of these are charter schools) and test results submitted by its testing vendor. The Agency's process for calculating district and campus accountability ratings includes controls to verify the accuracy of calculations. These controls include the following:

- Two different Agency employees independently calculate the accountability ratings and compare their results to ensure accountability ratings calculations are accurate and complete.
- The Agency provides preliminary data for accountability rating calculations to the districts and campus for their review before finalizing the ratings.
- The Agency has access controls in place to ensure that data transmitted between testing vendor systems and internal systems are complete.

An accountability rating can be achieved by meeting the absolute standards for the different base indicators. However, under certain conditions, a campus or district can achieve a rating by meeting required improvement and/or by using the "Exceptions Provision," which provides relief to larger campuses and districts with more diverse student populations who are evaluated on more measures. (See Appendix 2 for additional information on the Exceptions Provision and the calculation of accountability ratings.)

Chapter 1-B

The Agency Relies on School Districts and Charter Schools to Submit Accurate Student Data on Ethnicity and Economic Status

The Agency relies on the districts, charter schools, and its testing vendor to submit accurate information necessary to determine accountability ratings. The districts and charter schools are responsible for ensuring that demographic data submitted to the Agency is complete and accurate, in accordance with Title 19, Texas Administrative Code, Section 61.1025. This audit included testing of data submitted by 14 campuses for the 2005-2006

school year. The scope of this audit did not include verifying the accuracy of test results on the Texas Assessment of Knowledge and Skills (TAKS) that the testing vendor submitted to the Agency.

District and charter school data. Districts and charter schools submit student enrollment data to the Agency. This data includes student demographics—such as name, ethnicity, and economic status—and is submitted to the Agency and the testing vendor through the Public Education Information Management System (PEIMS). The testing vendor uses the demographic data to prepare TAKS answer documents for each student. The answer documents are provided to the districts before testing because districts must verify that demographic data is correct on individual student answer documents. The districts collect the answer documents after testing is completed and return them to the testing vendor for grading.

Testing vendor data. The testing vendor provides TAKS tests results and demographic information from the students' answer documents to the Agency. The demographic data identifies subgroups for ethnicity (African American, Hispanic, or white) and economic status (economically disadvantaged) for each student. Each district and campus is required to meet the state-established passing standard for the entire student population, as well as applicable subgroups for each base indicator. (See Appendix 2 for additional information on the state-established passing standards.)

Answer Document Codes

A campus or district must code answer documents as "scored," "absent," "other," or "exempt." If a student is absent, the answer document is marked as "absent." "Other," for example, is used if a student gets sick in the middle of a test or is identified as cheating. Students can be "exempt" from taking TAKS tests because they have limited English proficiency or meet special education requirements for exemption.

Only answer documents marked "scored" are used to calculate the accountability rating.

Campus and district personnel are responsible for ensuring that the answer documents are coded correctly.

The testing vendor processes the completed answer documents that districts submit by locally assigned test codes of "scored," "absent," "other," or "exempt" (see text box). The Agency has manuals on its Web site to assist districts with coding answer documents and to provide guidance on the decision-making process for exemptions.

TAKS test exemptions. Decisions to exempt students from taking one or more of the TAKS tests are made at the campus level with district supervision. Students may be exempted from taking one or more of the TAKS tests for reading, mathematics, writing, science, and social studies if they meet special education requirements or if they are not proficient in the English language. Students exempted from one or more TAKS test must still be tested using the State-Developed Alternative Assessment II (SDAA II) or a locally developed alternate test (see Appendix 4 for additional information on SDAA II). Specifically:

- Exemptions due to special education needs are determined by local admission, review, and dismissal committees. Districts and campuses are required to maintain sufficient documentation in admission, review, and dismissal committee files to explain why a student was exempted from a

TAKS test. The admission, review, and dismissal documentation should also include the committee’s decision on the appropriate alternate testing for each exempted student.

- Exemptions due to limited English proficiency are determined by local language proficiency assessment committees. According to Title 19, Texas Administrative Code, Chapter 101, students in their first three years of schooling in the United States can be exempted from TAKS testing for limited English proficiency if a formal evaluation determines that they have a significant language barrier. This determination must be documented in the students’ files.

Chapter 1-C

Errors Identified at Sample Campuses Should Be Corrected, But They Did Not Affect the Campuses’ Accountability Ratings

Auditors reviewed 502 students’ information while conducting site visits at 14 campuses in 12 districts across the state (see Table 1). The location and size of the campuses and districts were considered when selecting campuses to visit to obtain coverage for the state’s public school system. Additionally, campuses that demonstrated improvements in TAKS test results that coincided with significant fluctuations in the number of students taking the exam as a whole and by subgroups during the 2004-2005 and the 2005-2006 school years were more likely to be selected for a site visit.

Table 1

Campuses Visited		
Region Number	Campus Name	District Name
1	Pittman Elementary	Raymondville Independent School District
1	Rivera High School	Brownsville Independent School District
4	Deady Middle School	Houston Independent School District
4	Walt Disney Elementary	Alvin Independent School District
5	Central Senior High School	Beaumont Independent School District
5	Ozen High School	Beaumont Independent School District
6	Huntsville High School ^a	Huntsville Independent School District
10	H.S. Thompson Elementary ^b	Dallas Independent School District
10	Yale Elementary	Richardson Independent School District
12	Fairway Middle School ^b	Killen Independent School District
17	Idalou High School	Idalou Independent School District
17	Post High School	Post Independent School District
19	Lincoln Middle School ^b	El Paso Independent School District
19	Wiggs Middle School	El Paso Independent School District

Campuses Visited		
Region Number	Campus Name	District Name
20	Nimitz Middle	North East Independent School District
^a Visited for planning purposes only. ^b This campus was academically unacceptable in 2005 and was at least academically acceptable in 2006.		

Errors did not impact accountability ratings. Of the 15 campuses visited, three were selected because they were academically unacceptable in 2005 and upgraded to at least academically acceptable in 2006. These three campuses accounted for 120 of the 502 (24 percent) students' information reviewed and for 34 of the 156 (22 percent) of the total errors identified. However, the errors identified at these campuses and the other campuses visited did not affect the campuses' accountability rating. Errors identified occurred because campuses did not have sufficient documentation to support how students were classified or because districts incorrectly classified student answer documents.

Auditors tested 502 students' demographic, exemption, and TAKS answer document coding information at 14 campuses for the 2005-2006 school year. Of these:

- 144 of 502 (29 percent) student files had at least one error.
- 94 of 156 (60 percent) errors identified were due to the district or campus not maintaining documentation (see Table 2).
- 62 of 156 (40 percent) errors identified were due to the district or campus incorrectly coding student answer documents (see Table 3).

Documentation errors. Campus documentation to support classification information includes:

- Student registration and enrollment documents.
- Absence and documentation for "other" coding, such as forms completed by teachers documenting reason for "other."
- Special education and limited English proficiency committee meeting minutes and related student files.
- Teacher or parent referrals for special services.
- Diagnostic tests, medical documentation, and other assessments.

The largest number of errors (18 errors) due to lack of documentation were associated with files that lacked support indicating that the students had

limited English proficiency (31 errors), belonged to a particular ethnic group (20 errors), or were assessed as requiring special accommodations by an admission, review, and dismissal committee. Specifically:

- **Limited English proficiency.** Auditors identified 31 files that did not contain required documentation for exemptions due to limited English proficiency status. For example, at Wiggs Middle School, most student files did not include a documented explanation that stated the students should be exempted from TAKS tests due to limited English skills.
- **Ethnicity.** Auditors identified 20 files that did not contain support to document the students' ethnicity. A survey of 28 districts and the 15 site visits conducted indicated that a student's ethnicity is generally identified by parents on school enrollment forms.
- **Admission, review, and dismissal committee.** Documentation that districts or campuses had administered tests or that test results indicated that students needed special accommodations was not found in 18 student files. For example, Central High School was not in compliance with Title 19, Texas Administrative Code, Chapter 89, because four students did not have documentation to show that a required meeting occurred to determine testing levels for the students.

Table 2 provides details on the number of errors identified due to a lack of documentation to support a particular demographic, exemption, or code.

Table 2

Number of Errors Due to Lack of Documentation						
Campus	Demographic, Exemption, or Code Not Documented Appropriately					Total Errors
	Limited English Proficiency	Ethnicity	Admissions, Review, and Dismissal Committee	Absence	Coding of "Other" ^a	
Pittman Elementary School	0	7	1	0	2	10
Rivera High School	2	5	0	0	0	7
Deady Middle School	2	0	2	0	4	8
Walt Disney Elementary School	0	0	0	0	0	0
Central High School	0	0	5	6	1	12
Ozen High School	1	0	1	7	1	10
H.S. Thompson Elementary ^b	0	4	2	2	0	8
Yale Elementary School	0	0	0	0	0	0

Number of Errors Due to Lack of Documentation						
Campus	Demographic, Exemption, or Code Not Documented Appropriately					Total Errors
	Limited English Proficiency	Ethnicity	Admissions, Review, and Dismissal Committee	Absence	Coding of "Other" ^a	
Fairway Middle School ^b	0	0	0	0	0	0
Idalou High School	0	0	1	0	0	1
Post High School	0	3	2	0	0	5
Lincoln Middle School ^b	9	0	0	0	0	9
Wiggs Middle School	17	0	2	1	0	20
Nimitz High School	0	1	2	1	0	4
Total Errors	31	20	18	17	8	94

^a "Other" is the code designated by the Agency for unique testing situations in which a student is not absent or exempt from a test, but for whom a test is not coded as "Scored." Use of the "Other" code necessitates documentation to explain why the student was coded as "Other." Examples include students who become ill while taking a test or students who are withdrawn during test administration.

^b This campus was academically unacceptable in 2005 and was at least academically acceptable in 2006.

Coding errors. The 62 errors identified due to incorrect coding included misclassifying students' ethnicity or economic status, making incorrect exemption decisions, or incorrectly coding a student's answer document. Specifically:

- "Other" coding. Districts or campuses incorrectly coded 24 students as "other" on TAKS answer documents. Twenty of these students should have been coded as "exempt" from assessment due to limited English proficiency, and four students should have been coded as "exempt" by the admission, review, and dismissal committee.
- Economically disadvantaged status. Registration information and Food and Nutrition Program information for 12 students did not agree with the economically disadvantaged determination noted on the 12 students' answer documents.
- Absences. Attendance documentation at four campuses did not agree with the answer document coding for nine students. School records indicated that eight students had withdrawn from school; therefore, they were not enrolled at the campus during testing and should not have been coded as absent. One student was coded as absent but did attend school that day; this student did not take the TAKS test.

- Limited English proficiency. Districts or campuses coded six students as exempt because of limited English proficiency although the students did not meet state requirements for the exemption.
- Admission, review, and dismissal. Six students correctly exempted from TAKS were coded incorrectly on their answer documents. One student at Central High School was administered a TAKS I test when the admission, review, and dismissal documentation noted that the student would take a locally determined alternate assessment exam. Also, one high school student was incorrectly exempted from the exit-level TAKS test that students must pass to meet state graduation requirements only because the student failed the test.
- Ethnicity. The ethnicity of four students was coded incorrectly. One student at Central High School had multiple ethnicities noted on two separate enrollment forms, and no clarification was obtained. Another student at Deady Middle School had two answer documents, and each answer document had a different ethnicity noted.

Table 3 provides details on the number of errors identified due to incorrect coding.

Table 3

Number of Errors Due to Incorrect Coding							
School	Type of Coding Error						Total Errors
	"Other" Coding Incorrect	Economically Disadvantaged Status Incorrect	Absence Incorrect	Incorrectly Exempted for Limited English Proficiency	Admission, Review, and Dismissal Exemption Incorrect	Ethnicity Misclassified	
Pittman Elementary School	0	0	0	0	0	0	0
Rivera High School	1	0	2	0	0	0	3
Deady Middle School	11	0	3	0	1	1	16
Walt Disney Elementary School	0	1	0	0	0	0	1
Central High School	1	1	3	0	2	1	8
Ozen High School	1	4	0	0	0	0	5
H.S. Thompson Elementary**	0	0	0	0	0	0	0
Yale Elementary School	0	0	0	0	0	0	0
Fairway Middle School	6	3	0	1	3	1	14
Idalou High School	0	0	0	0	0	0	0
Post High School	0	1	0	0	1	0	2
Lincoln Middle School ^a	0	0	1	1	0	1	3

Number of Errors Due to Incorrect Coding							
School	Type of Coding Error						Total Errors
	"Other" Coding Incorrect	Economically Disadvantaged Status Incorrect	Absence Incorrect	Incorrectly Exempted for Limited English Proficiency	Admission, Review, and Dismissal Exemption Incorrect	Ethnicity Misclassified	
Wiggs Middle School	0	1	0	4	0	0	5
Nimitz High School	4	1	0	0	0	0	5
Total Documentation Errors	24	12	9	6	7	4	62

^a This campus was academically unacceptable in 2005 and was at least academically acceptable in 2006.

Student withdrawal coding. At two campuses, auditors also tested whether withdrawal codes were accurate and complete for students who withdrew from school. The number and classification of student withdrawals at a middle school or high school can affect a campus's accountability rating. Auditors visited two schools at which a high number of student withdrawals in the 2004-2005 school year could have affected the campuses' accountability ratings for the 2005-2006 school year. Student withdrawals at Fairway Middle School were sufficiently supported. However, Post High School did not maintain sufficient documentation to support withdrawal coding for 5 of 36 (14 percent) students who withdrew from the campus during the 2004-2005 school year. The State of Texas Records Retention Schedule, Local Schedule for School Districts requires campuses to maintain student records for seven years, but Post High School did not provide the necessary documentation for these students. This could affect the campus's completion rate, which is one component of its accountability rating (see Appendix 2 for details on accountability ratings.)

Chapter 1-D

The Agency Has Not Fully Implemented Its Monitoring Process for the Accountability Data Submitted by Districts

The Agency's accountability system has undergone revisions in recent years that are intended to strengthen its monitoring of data that districts submit. In fiscal year 2003, the Agency changed its monitoring program for accountability data, including:

- Calculating performance measures.
- Conducting data analysis to identify potential data quality issues with assessment, withdrawal, and discipline data in districts.
- Reviewing the significance of the potential data quality issues identified.

- Following up with districts to review and, if necessary, correct data quality issues.

Piloting the Agency's new monitoring process. The 2005-2006 school year was the pilot year for the Agency's recently updated data validation component of its monitoring program, with complete implementation planned for the 2006-2007 school year.

The Agency uses data that districts and its testing vendor provide for several purposes, including calculating performance measures and performing data validation monitoring. Potential data quality issues identified during this validation are communicated to the districts, which are then required to evaluate their data. The districts use this evaluation to determine whether errors exist and, if so, to develop a plan to prevent future data quality issues.

The Agency's revised monitoring program included selecting a sample of districts and verifying whether those districts' data quality issues were appropriately addressed. The Agency also planned to conduct site visits if serious data issues were identified. The Agency received and reviewed documentation from 28 districts that had serious data issues and were required to submit documentation. However, the Agency did not select a random sample to ensure that the other 205 districts that had less serious issues addressed their data quality issues. Some districts voluntarily submitted this information.

Beginning with the 2006-2007 school year, the Agency required districts to submit evaluations and improvement plans addressing the data errors identified. All 10 districts auditors tested submitted improvement plans to the Agency as required. However, the Agency was not able to complete its review of the districts' analyses as of May 2007.

Additionally, in fiscal year 2007, the Agency established an Office of Inspector General to investigate campuses identified by an external consultant as having potential TAKS test security violations (see Appendix 3 for the Agency's test security plan).

Monitoring changes have not been fully implemented. The Agency had not fully implemented some monitoring changes, such as following up with districts that were identified as having less serious potential data quality issues. As of June 2007, the Agency had not conducted any site visits to districts as part of its data validation monitoring.

The Agency evaluates and compares statewide data with district-level data to identify and follow up on potential data quality issues. For the 2005-2006 school year, the Agency completed data analysis; but according to the Agency, it did not follow up to ensure that districts that had less serious data quality issues evaluated and addressed the data quality issues identified.

Further improvements to the Agency's monitoring process are needed. The Agency could identify additional data quality issues through further analysis. Below are examples of some issues that the Agency could identify and report to districts for further review:

- Certain data fields related to how students are classified into subgroups were blank for 221 of 13,815 (less than one percent) student records reviewed.
- Multiple answer documents existed for some students. At one campus, 4 of 40 (10 percent) student files reviewed had two answer documents. Multiple answer documents increase the number of students counted as tested at the campus and district level, which is one factor that can affect the calculation of the accountability rating.
- Of the 14 campuses visited, auditors identified 20 students at four campuses whose answer documents were incorrectly coded as "other" when these students should have been "exempted" for limited English proficiency. This problem may be identified by analyzing the combination of coding for each student.
- The data code "No Information Available" was not consistently used by the Agency. In some instances, this code identified students who withdrew from the campus or district. In other instances, this code identified students who were exempted from taking TAKS tests. Campus personnel indicated that they were unclear as to why the "No Information Available" scoring code was reflected on some students' answer documents.

Recommendations

The Agency should:

- Complete implementation of its monitoring program.
- Conduct additional analysis to improve quality of data, such as identifying blank fields, duplicate student answer documents, and errors associated with incorrect use of codes such as "other" and inconsistent use of the "No Information Available" code.
- Through additional data analysis, identify patterns of coding inconsistencies, and notify districts to evaluate the data to determine whether there is an error.

Management's Response

- *The agency agrees with the recommendation to complete its implementation of the data validation monitoring (DVM) component of the Performance-Based Monitoring (PBM) system. As noted in the audit report, the 2005-2006 program year was the pilot year for implementation of the DVM component of the PBM system. During the 2006-2007 program year, the agency modified and expanded the indicators used in the DVM system based on results of the pilot year. Additionally, the agency completed its implementation of DVM interventions in 2006-2007 by requiring submissions from those districts with the most significant data anomalies and by following up with selected districts with less serious data anomalies identified. In 2007-2008 and beyond, the Division of Performance-Based Monitoring will continue to review, revise, and enhance DVM indicators on an annual basis to address patterns of data concerns, and the Division of Program Monitoring and Interventions will continue to implement a graduated system of interventions and sanctions for districts with potential data quality concerns, with interventions and sanctions ranging from completion and/or submission of focused data analyses, student-level data reviews, and continuous improvement plans to on-site reviews, as appropriate. Sanctions under Chapter 39 of the Texas Education Code also may be applied to districts as necessary and appropriate to address data quality concerns.*

Persons Responsible:

Rachel Harrington, Division of Performance-Based Monitoring and Laura Taylor, Division of Program Monitoring and Interventions

Timeline: 2007 - 2008 School Year

- *The agency is committed to developing and implementing valid and meaningful analyses that will continue to enhance the quality of data submitted by school districts. The data validation component of the agency's performance-based monitoring system currently includes 58 indicators designed to identify potential anomalies in student assessment data, leaver/dropout data, and discipline data. Another component of the agency's performance-based monitoring system, the Performance-Based Monitoring Analysis System (PBMAS) includes 8 indicators designed to identify inappropriate or insufficient participation of students with limited English proficiency and students with disabilities in the state's student assessment system. All performance-based monitoring indicators undergo an annual review process, and as a result of that process indicators are added, deleted, or revised as necessary to ensure that valid and meaningful analyses continue to be implemented. The agency intends to continue this annual review process and will explore the specific suggestions for analyses that are made in the report. The agency will also*

work with its test contractor to determine what additional review and analysis of answer documents might be appropriate.

At the same time, because the data errors identified at the selected campuses are limited and did not affect the campuses' accountability rating, statewide data analyses incorporated into the monitoring system may not be the most effective mechanism to effect improvement at the local level. As noted in the report, the great majority (71%) of the student files reviewed at selected campuses had no data errors. The data errors found appear to be ones that can be improved with statewide, targeted training focused on certain key coding issues.

The report notes that the largest number of data errors found were due to lack of documentation that students were limited English proficient, belonged to a particular ethnic group, or were assessed as requiring special accommodations by an Admission, Review, and Dismissal Committee. There were also several instances of students who were no longer enrolled at a campus being coded absent and students who were exempt being coded "other."

These coding errors all indicate a need for additional training and technical assistance at the local level about the requirements for coding answer documents and the documentation necessary to support LPAC and ARD committee decision-making. TEA agrees that the quality of data submitted by local districts could be improved and are implementing several changes in the assessment program that should address these concerns. Beginning with the 2008 spring administrations, the Student Assessment Division will be using a combined answer document for TAKS English and Spanish versions, TAKS (Accommodated), and Linguistically Accommodated Testing (LAT). This should eliminate the problems with duplicate answer documents for students who do "split" testing (for example, take a Spanish version TAKS reading test and a TAKS (Accommodated) mathematics test). The Student Assessment Division is also including language in the 2008 District and Campus Coordinator Manual that clarifies when it is appropriate to use a score code of "O" and when it is inappropriate to use this score code. Finally, the Student Assessment Division will present several sessions at the 2007 Texas Assessment Conference on proper submission of answer documents, and will stress this during the annual training in December that is provided to the 20 Education Service Centers and the testing coordinators of the 25 largest districts in the state.

Persons Responsible:

*Rachel Harrington, Division of Performance-Based Monitoring and
Gloria Zyskowski, Division of Student Assessment*

Timeline: 2007-2008 School Year

- *The agency agrees that clarification should be provided to districts if errors in data submission are detected through data analysis. The Student Assessment Division's Security Task Force routinely receives reports from district testing coordinators when proper testing procedures have not been followed, such as testing students with the incorrect assessment. Frequently these incidents are reported after score reports are sent to districts and the scores received would indicate that the answer documents were not coded correctly. Beginning immediately the Security Task Force will add language to the letters that are sent to districts in response to incident reports that will reinforce the information provided in administration materials about the proper coding and submission of answer documents. Through use of an automated database that is currently under development, the Security Task Force will have the capability of tracking incidents that relate to coding errors and will be able to identify districts that consistently have issues in this area. Follow-up will be provided to these districts to correct any misunderstanding about data submission as it relates to assessment answer documents. In addition, the procedures will be emphasized during the annual training in December that is provided to the 20 Education Service Centers and the testing coordinators of the 25 largest districts in the state.*

Persons Responsible: Gloria Zyskowski, Student Assessment

Timeline: 2007-2008 School Year

Appendices

Appendix 1

Objectives, Scope, and Methodology

Objectives

The objectives of this audit were to:

- Determine whether selected processes and controls at the Texas Education Agency (Agency) provide reasonable assurance of the accuracy of accountability data.
- Verify the accuracy of selected accountability data for campuses that have been upgraded from an “academically unacceptable” accountability rating to an “academically acceptable” accountability rating.

Scope

The scope of this audit covered campus, district, and state accountability data from the 2003-2004 school year through the 2005-2006 school year. The audit included reviews of supporting documentation for student demographic information and any documentation related to exemptions from Texas Assessment of Knowledge and Skills (TAKS). The audit did not include verification of testing results provided by the Agency’s testing vendor.

Methodology

The audit methodology included analysis of district and campus accountability ratings calculated in 2005 and 2006 and review of supporting documentation for a sample of students at 15 campuses visited for the 2005-2006 school year. Auditors also reviewed documentation for the 2005-2006 and 2006-2007 school years provided by districts to address potential data quality issues identified by the Agency’s monitoring program.

Information collected and reviewed included the following:

- Selected student permanent files; “absentee” and “other” documentation; admission, review, and dismissal (ARD) and limited English proficiency (LEP) files; and TAKS testing results for the 2005-2006 school year.
- Agency student assessment data from 2003 to 2006, which included student demographic information and testing results.
- Agency enrollment data from the Public Education Information Management System (PEIMS) from 2003 through 2006.

- Agency accountability data calculated in 2005 and 2006.

Procedures and tests conducted included the following:

- Reviewed regulations, policies and procedures, and manuals.
- Reviewed campus data to determine the accuracy of student assessment data provided by the districts.
- Analyzed student assessment data.
- Interviewed representatives of education advocacy groups.
- Reviewed other state's Web sites to obtain information on their accountability systems.

Criteria used included the following:

- Texas Education Agency manuals.
- Texas Education Code and Texas Administrative Code.
- Code of Federal Regulations.

Project Information

Audit fieldwork was conducted from May 2007 through July 2007. This audit was conducted in accordance with generally accepted government auditing standards.

The following members of the State Auditor's staff performed the audit:

- Angelica C. Martinez, CPA (Project Manager)
- Audrey O'Neill, CGAP (Assistant Project Manager)
- Isaac Barajas
- Darrell Edgar, CFE
- Letecia Mendiola, MPA
- Jenay Oliphant
- Bill Vanecek, CGAP
- Leslie Ashton, CPA (Quality Control Reviewer)
- Sandra Vice, CISA, CIA, CGAP (Assistant State Auditor)

2006 Accountability Rating Information

The Texas Education Agency (Agency) calculates an accountability rating for each campus and school district. The 2006 accountability ratings were determined using four base indicators:

- Performance on the Texas Assessment of Knowledge and Skills (TAKS).
- Performance on the State-Developed Alternative Assessment II (SDAA II).
- Completion Rate I.
- Annual dropout rate for grades 7 and 8.

Table 4 lists the standards required to meet each accountability rating.

Table 4

Excerpt from Texas Education Agency Requirements			
Base Indicator	Rating Category		
	Academically Acceptable	Recognized	Exemplary
TAKS (2005-2006) results for all students and each student group. ^a	Meets each standard: Reading/English language arts, writing, social studies, 60 percent. Mathematics, 40 percent. Science, 35 percent. OR Meets required improvement. ^b	Meets 70 percent standard for each subject. OR Meets 65 percent standard for each subject and meets required improvement. ^b	Meets 90 percent standard for each subject.
SDAA II (2006) results for all students.	Meets 50 percent standard (meet admissions, review, and dismissal committee expectations). OR Meets required improvement. ^b	Meets 70 percent standard (meet admissions, review, and dismissal committee expectations). OR Meets 65 percent standard and meets required improvement. ^b	Meets 90 percent standard (meets admissions, review, and dismissal committee expectations).
Completion Rate I (class of 2005) for all students and each student group.	Meets 75 percent standard. OR Meets required improvement. ^b	Meets 85 percent standard. OR Meets 80 percent standard and meets required improvement. ^b	Meets 95 percent standard.

Excerpt from Texas Education Agency Requirements			
Base Indicator	Rating Category		
	Academically Acceptable	Recognized	Exemplary
Annual Dropout Rate (2004-05) for all students and each student group.	Meets 1.0 percent standard. OR Meets required improvement. ^b	Meets 0.7 percent standard. OR Meets 0.9 percent standard and required improvement. ^b	Meets 0.2 percent standard.
^a African American, Hispanic, white, and economically disadvantaged. ^b Required Improvement gives campuses or districts credit for improvement from the prior year.			

Source: *Texas Education Agency 2006 Accountability Manual*, Chapter 4.

Exceptions

The “Exceptions Provision” provides relief to larger campuses and districts with more diverse student populations who are evaluated on more measures.

The number of exceptions available for a campus or district is dependent on the number of assessment measures on which the campus or district is evaluated, as shown in Table 5.

Table 5

Exception Provisions	
Number of Assessment Measures Evaluated	Maximum Number of Exceptions Allowed
1-5	0 exceptions
6-10	1 exception
11-15	2 exceptions
16 or more	3 exceptions

Source: *Texas Education Agency 2006 Accountability Manual*, Chapter 3.

The Exceptions Provision applies to any of the 25 TAKS measures (five subjects multiplied by five groups: all students, African American, Hispanic, white, and economically disadvantaged) and the SDAA II measure. The Exceptions Provision does not apply to either Completion Rate I or Annual Dropout Rate indicators.

For additional information on accountability ratings, see the Agency’s Web site at <http://www.tea.state.tx.us/perfreport/account/2006/manual/>.

Statewide Statistics

Texas has more than 7,000 campuses in more than 1,200 school districts. Table 6 summarizes the accountability rates for campuses and districts in Texas.

Table 6

Summary of Accountability Ratings for Texas' Public Schools System		
Accountability Category	2005	2006
Number of Districts	1,229	1,227
Number of Campuses	7,908	7,956
Number of Exemplary Campuses	304	564
Number of Recognized Campuses	1,909	2,826
Number of Academically Acceptable Campuses	4,356	3,190
Number of Academically Unacceptable Campuses	233	267
Number of Campuses Not Rated or Rated as Alternative Education Accountability Campuses	1,106	1,109

Source: Texas Education Agency and the State Auditor's Office Analysis.

Accountability ratings for each campus and district in Texas that is rated can be obtained from the Agency's Web site at <http://www.tea.state.tx.us/perfreport/account/2006/ratelist.srch.html>.

Testing Vendor

The Agency contracts with Pearson Educational Measurement (Pearson) to administer TAKS tests statewide. For the 2006-2007 school year, the Agency contracted with Pearson to develop, construct, print, distribute, score, and report student testing. The amount of this contract is \$80,859,949. The Agency also contracted with Pearson to develop study materials for summer programs for an additional \$8,755,932.

Texas Education Agency's June 2007 Texas Assessment of Knowledge and Skills Test Security Plan

In June 2007, the Texas Education Agency (Agency) published a 14-point Texas Assessment of Knowledge and Skills test security plan. This plan will be implemented in the 2007-2008 and 2008-2009 school years and is designed to assure parents, students, and the public that the results of the standardized testing are reliable and meaningful by preventing and deterring cheating.

Under the recently added test security procedures, the Agency:

- Analyzes scrambled blocks of test questions to detect answer copying.
- Assigns independent test monitors to campuses based on evidence of testing irregularities and makes unannounced visits to additional campuses on test days.
- Requires school districts to implement seating charts for use during all state assessment administrations.
- Develops a transparent method to annually identify statistically irregular patterns of test answers that may indicate cheating to augment other detection methods already in use.
- Contracts with a national expert for independent review and advice on statistical cheating detection.
- Requires school districts to provide information that links test administrators to students.
- Requires students in certain grades to sign a grade-appropriate pledge of honor immediately prior to taking a state assessment, just as all test administrators are required to sign a security oath prior to each administration.
- Adds to the list of sanctions for cheating, lowering a school district's rating.
- Provides additional information in test administration manuals related to consequences for educators and students if cheating occurs.
- Requires school districts to report to the Agency any investigatory and disciplinary actions taken against educators and students locally.
- Requires school districts to maintain test security materials, signed security oaths, and seating charts for five years following a test administration.

- Develops a model policy on test integrity and test security procedures for adoption by local school boards.
- Ensures that state investigations, sanctions, and corrective actions are conducted in a fair, expeditious, and equitable manner.
- Requires test administrators to participate in a standardized online training program that addresses mandatory test security procedures.

Revised Testing for Students with Disabilities

The Texas Education Agency (Agency) recently revised its alternate assessments for students with disabilities. These revisions impact the assessment options for admission, review, and dismissal committees, and go into effect during the 2007-2008 school year.

Overview of Alternate Assessments (2005-2006 and 2006-2007 School Years)

During the 2005-2006 and 2006-2007 school years, students with disabilities were tested using Texas Assessment of Knowledge and Skills-Inclusive (TAKS-I) tests, State Developed Alternative Assessment II (SDAA II) tests, or locally developed alternate assessments. Specifically:

- TAKS-I tests provided on-grade-level testing using the same testing material as the general TAKS test. This test provided formatting accommodations for students with disabilities, including additional white space and larger answer ovals in testing materials and a shortened version of the test that did not contain pilot questions.
- SDAA II tests provided on- or below-grade-level testing for students with disabilities. This test provided content-based modifications and other accommodations as determined by the student's admissions, review, and dismissal committee.
- Locally developed alternate assessments provided on- or below-grade-level testing for students with significant cognitive disabilities. These locally developed assessments also provided a testing alternate for students in grades for which SDAA II was unavailable.

Testing Accommodations

Federal law requires that the appropriate assessment tool for each student with disabilities be documented in the student's individualized education program, which is developed and approved by the student's admission, review, and dismissal committee. The individualized education program also should list the accommodations made to the student's testing situation. Accommodations are modifications to the test, such as reading the test to the student or allowing the student to take the test in an individual or small group setting.

Revised Alternate Assessments (2007-2008 School Year)

Beginning with the 2007-2008 school year, the Agency will implement new on-grade-level assessment tools for all students with disabilities. These new assessments include Texas Assessment of Knowledge and Skills (TAKS) with and without accommodations, the Texas Assessment of Knowledge and Skills-Modified (TAKS-M), and the Texas Assessment of Knowledge and Skills-Alternate (TAKS-Alt).

- TAKS is the assessment used for students without disabilities or other exemptions. A student who is not exempted from standardized testing due to disabilities determined by an admissions, review, and dismissal committee or due to limited English proficiency will be administered the TAKS.

- TAKS (Accommodated) is composed of the same testing material as TAKS, but with modifications to the presentation of the testing material. These modifications include additional white space, larger fonts, and larger answer ovals. TAKS (Accommodated) replaces the previous TAKS-I test.
- TAKS-M contains the same content as TAKS, but it provides additional testing accommodations for students with disabilities. These accommodations include simplified sentence structures and vocabulary, fewer answer choices, and adjusted formatting. TAKS-M replaces the previously administered SDAA II tests.
- TAKS-Alt is a testing tool designed to evaluate students with significant cognitive disabilities. Testing is linked to on-grade-level curriculum using “essence statements” developed by the Agency and by individual campuses that identify core grade-level expectations and link those expectations to pre-requisite skills for each student. This is used to determine appropriate assessment activities. TAKS-Alt generally assesses students through activities that are observed by the students’ instructors. The instructors then use Agency-developed guidelines to score the student’s test. Test results are entered by the instructor into an online Agency system. TAKS-Alt replaces the locally developed alternate assessments and is the first standardized statewide assessment for this student group.

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