



State of Arizona
Department of Education

Components of a Rigorous Investigation to Identify and Investigate Accountability Fraudulent Activity

When a school is identified under two or more of the five criteria below and there is reasonable concern for systemic issues, the Arizona Department of Education (ADE or Department) will withhold the accountability determination and commence an investigation to determine whether accountability data were manipulated and submitted under fraudulent pretense.

Qualifying criteria:

1. School is flagged on Erasure report for the current year
2. School has been previously flagged on Erasure report within the previous 3 years
3. Verbal or written allegations of cheating received by the ADE Assessments and/or Accountability units
4. Sudden and/or significant changes to student enrollment data which positively impacts an accountability determination
5. Abnormal and/or inexplicable gains in the current year as compared to school's performance in prior years

If the local education agency (LEA)/school chooses to conduct its own investigation rather than interview with ADE staff, the LEA must submit a comprehensive narrative which addresses the specific school(s) and/or classroom(s) to ADE by a deadline agreed upon with the agency. ADE is happy to serve as a resource to districts in the course of their investigations. The Department may request additional information after reviewing the results of the investigation.

An LEA's investigation of test irregularities in response to the Department's notification of possible fraudulent activity related to school/LEA accountability should include the following components at a minimum:

I. Training

- a. Provide a description of test administration training and to whom it was provided at each identified school.
- b. Identify who handled the materials in any way but did not receive test administration training. LEAs are expected to have written documentation that details who received training.

II. Access to Test Materials

- a. Describe the manner in which test materials were distributed and collected at each identified school, detailing a) any discrepancies between this process and the guidelines set forth by the Department, and b) whether any corrective action was taken in response to such discrepancies.





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- b. Describe any irregularities found regarding the administration of the test at each identified school, including for example, test materials retained beyond the allotted time according to the test manuals, etc., and whether any corrective action was taken in response to such irregularities.
- c. Determine which employees at each identified school (including administrators, teachers, clerical staff, counselors, paraprofessionals or other employees) had access to secure test materials before and after testing during each day that test documents were kept in the school building. Describe any corrective action taken in response to employees other than the school test coordinator handling secure test materials outside of actual test administration. Determine whether any employee altered student responses on test documents at each identified school and describe how test tampering occurred.
- d. Describe the manner in which test documents were transported from each school to the central office after testing concluded and prepared for the State's testing vendor. Determine whether any employee altered student responses on test documents during this time and describe how test tampering occurred as well as corrective action taken.

III. Variance in Erasure Data

- a. Based on the investigation conducted by the LEA, describe what the LEA learned about the test environment at each identified school that explains why its erasure data varies significantly from the rest of the State's testing population.
- b. Describe the changes the LEA will make in its testing procedure.

IV. Gathering information through interviews

- a. Interview information gathered by the LEA should detail the time, date, interviewee, and interviewer information as well as a detailed summary or transcription of the interview.
- b. Information may also be gathered by the Department through requested, recorded interviews with its staff.
- c. Prompts and/or questions would include:
 - i. Were the specific test documents in question handled inappropriately at any time/point in the test administration process?
 - ii. Have there been any other incidents associated with this test administration which were out of the ordinary for this school or LEA?
 - iii. Have there been any other test irregularities related to the students and/or test administrator and/or proctor associated with these assessments?
 - iv. What opportunities existed which might have allowed tampering to occur?
 - v. What instructions did the test administrator and/or proctor give to students to take the test which might explain the pattern of irregularities?
 - vi. What is the experience level of the test coordinator, test administrator and/or proctor?





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- vii. What additional test administration security measures did the school/LEA implement beyond the standard practice?
 - viii. How were students prepared to take the test in a manner which would uphold integrity of the assessment?
 - ix. Aside from the irregularities identified here, what other reports of fraudulent activity, if any, have been leveraged which had a common theme or individual?
 - x. State and federal accountability aside, how do the results of student achievement on standardized tests positively or negatively impact the adults and students at the local level?
 - xi. What other information can school/district personnel provide which might shed light on this investigation?
- d. Information gathered through interviews and all other narrative will serve as one of several considerations to determine if fraudulent activity occurred.

