



# TASA

## Texas Association of School Administrators

406 East 11<sup>th</sup> Street • Austin, TX 78701-2617 • 512.477.6361, 800.725.TASA (8272) • Fax: 512.482.8658 • [www.TASAnet.org](http://www.TASAnet.org)

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May 10, 2016

Mr. Mike Morath  
Commissioner of Education  
1701 N. Congress Avenue  
Austin, Texas 78701

Dear Commissioner Morath:

We appreciate your recent response to certain STAAR testing irregularities as “unacceptable,” and your ongoing discussions with superintendents statewide. As you know from news reports and several summary reports that have already been shared with you, school districts across the state have reported countless problems with the recent STAAR administrations. I am sure you are aware of many of the issues described below, but we wanted to share the input we received from superintendents and testing coordinators across the state.

Years of testing millions of Texas students have shown that some issues will always arise and are inevitable. What is unprecedented this year is the scope and magnitude of issues associated with the STAAR administration that affect students, teachers, and administrators. The high-stakes nature of standardized testing requires that the state ensure, at a minimum, that assessments are valid and reliable, that appropriate testing procedures are in place and testing materials are secure, that those grading the assessments are qualified and available, and that student data is secure.

The numerous testing irregularities reported this year do not encourage confidence in the accuracy of student scores, the fairness of the administration across all student populations, or in the security of student identifiable information. Assigning accountability ratings based on such data will only compound the situation and will not reflect a true snapshot of either Texas students or schools.

We believe the continued use of the assessments with the array of issues associated with them will negatively affect state accountability ratings and the perception of our schools.

If the state continues to use these tests for grade promotion, graduation, and accountability purposes, then it must ensure they are administered properly with appropriate security measures in place. The state must be able to make assurances as to the security and reliability of the tests, the integrity of the process for delivering the tests and accompanying materials, the protection of student data, and the accuracy of test results reported back to districts.

Building upon the recent survey of districts in Region 4, TASA has gathered information from districts across the state on the recent testing incidents in an effort to provide a detailed picture of the serious flaws in the current testing system. Below is a sampling of the information we have received. We have summarized our findings into five categories.

## **I. Data Validity and Security**

Maintaining the security and confidentiality of testing materials is critical for ensuring valid test results and ensuring equity in testing opportunities for students. TEA has developed test security manuals and a test security supplement to ensure districts are consistent in gathering, handling, administering, and shipping testing materials. Certain district staff is required to sign oaths of testing security and confidentiality, and violations of these procedures can result in staff being subject to sanctions or loss of certification.

With the extensive security required for local district staff, it was alarming to find numerous occasions in which the state testing contractor did not follow the same stringent guidelines required at the district level. Key responses related to data validity and security are included below.

- Some districts received test results for students not enrolled in their districts and did not receive results for students in their own districts.
- There were too many scores of “0” for short answer questions, and the justifications for those scores were not acceptable.
- ETS staff was unaware that some districts received extra answer booklets — an indication that appropriate inventory control measures were lacking.
- ETS staff appeared unaware of the importance of the chain of custody in accounting for materials.
- Demographic information and names were incorrect on the pre-coded answer documents.
- Students’ STAAR-A Algebra I end-of-course (EOC) exams were scored as STAAR EOCs. Scores had not been corrected weeks later.
- Student results were missing from the December and March campus reports. Many of the students with missing results from the December administration had to retest in March as it was still unknown if they had passed the previous test.
- Districts did not receive Confidential Student Reports (CSRs) for some students, received other reports late, and, in some cases, received multiple CSRs for one student.
- District personnel were told by ETS to plan on retesting when grades 5 and 8 results were missing and ETS could not guarantee the student results would be found before the retest.
- Students were concerned with online testing glitches so they took extra time to complete their answers. Students marked answers and wrote essays and then had to resubmit lost work. Responses show concern that the data might not be valid. For example, did the system record the first essay a student wrote that was lost? OR, was the second essay the student wrote the essay of record? Neither ETS nor TEA could confirm.
- ETS sent testing materials with no staff designation, no “confidential materials” labels, and so poorly packed that materials could be seen through the packaging.
- Student data files and scores were missing or incorrect. Some districts received multiple scoring documents for the same student with different scores.

- Districts followed procedure and contacted ETS to let them know when students' names were misspelled or other student information was incorrect. ETS instructed district staff to change the data in the key fields themselves with no reassurance that ETS and TEA would have the updated information.
- The demographic information on a Summary Report was incorrect for a campus.
- One district reported that approximately one-third of its schools found discrepancies when comparing the answer documents submitted and the information returned via data files.
- The ETS system lacks the ability for test administrators to verify that students have answered each online question.
- There was widespread concern with the accuracy of STAAR-A data (e.g., one report indicated that certain students had passed the test, but a later report indicated that those same students had not passed the test).
- ETS posted some fifth- and eighth-grade data files according to schedule, but the files were blank. By the time the districts got the information three days later, many students missed out on needed targeted instruction.
- Some districts reported receiving emails from ETS with personal student information in the subject line and body of the email (Social Security numbers, PEIMS numbers, dates of birth). In some instances, this student information was not even for students enrolled in the district. ETS directed these districts to delete the emails containing the sensitive student information.

## II. Online Testing

The responses throughout all 20 regions of the state related to the ETS online testing system consistently indicated that the system lacked capacity for statewide testing both before, during, and after the actual test administrations. This led to a particularly frustrating experience for students whose ARD committees had determined that the STAAR-A was the most appropriate testing option. Many of these students were unable to access the STAAR-A, or if they did have access, the accommodation tools did not work efficiently or did not work at all. There was also widespread concern expressed for those students who needed to pass the online STAAR-A EOC exams in order to graduate, but were prevented from doing so as a result of online system problems. Responses related to online testing are included below.

- ETS did not provide sufficient training on how to use the online system to district staff. ETS customer support staff gave inconsistent, inaccurate, or inadequate responses to district personnel. One response noted that when ETS support staff were contacted after the online system crashed the day before student testing began the staff they spoke with “*were bewildered and unaware.*”
- ETS did not provide adequate practice and preparation to students on the use of accommodation tools available with STAAR-A. Online tutorials were unavailable to many. As noted, “*There are only 2 practice questions and children need more practice with online tools before the test, just as they do with any classroom accommodation/tool.*”
- STAAR-A online accommodations did not work well or did not work at all (e.g., text-to-speech tool, pencil tool, highlighter tool, and graphing tool). In addition, the oral administration feature was “*too fast, would fade in and out, mispronounced words, and had speech boxes that*

*disappeared.” Or as another response indicated, “the computerized voice reads the wrong words (e.g., will substitute “a” for “the,” etc.).”*

- STAAR-A, STAAR-L, and STAAR student responses were lost, erased, or disappeared. Often the system indicated that a student was still “actively” taking the test even after the student had completed the test and submitted his/her responses. Students were logged out of the test and unable to regain access. Individual student test scores were missing altogether from rosters. Students took the STAAR-L but their results indicated they were scored as STAAR-A (and vice versa). *“I was told by TEA to have students go back the same day and answer questions lost. So how is TEA/ETS going to know we had trouble or who those kids were? How valid are those scores?”*
- Some students were never able to access the STAAR-A as the ARD prescribed, causing the most immediate harm to those needing to pass a STAAR-A EOC in order to graduate. *“We were completely unable to test online, which will prevent seniors from the opportunity to graduate in May because their results will not be available.”*
- The TEA test administration instruction manual mandates monitoring of a student’s progress, but the ETS system didn’t allow this; therefore, there was no way to track student progress or to verify that all answers were complete. This added to the confusion and made it difficult to discern the cause of the problems. For example, had a student answered all of the questions that were then lost in cyberspace? This also initiated the belief that there were other problems that invalidated student responses that were not detected by district staff, TEA, or ETS. As noted, *“I do not trust the results from the online testing we did in March. I THINK we only had 5 students who had issues with the online tests, but not confident that will be accurate.”*
- Student distress at having to answer questions and write compositions numerous times, and observing similar struggles their peers were encountering, sometimes over several days, was noted numerous times. *“These testing anomalies were enough of a distraction to this group of already lower performing students to skew any validity of these tests.”*
- The ETS online system was not prepared to effectively account for students who had transferred from one district to another, making it particularly difficult for a receiving district that struggled to get information from the student’s former school district in time for a student to test. *“When I had to enroll a student who was late coming to our district, I had to enroll her in only online tests even though two of the tests would be paper. So now I have a student who shows to be testing online who won’t even be logging in. ETS reps told me to select any online test because it doesn’t matter.”*

### **III. Communications**

While a few districts reported no issues with regard to communication with ETS and TEA, the vast majority of districts reported problems as summarized below.

- Many districts expressed concerns with the excessive amount time they spent on hold on the telephone with ETS (30 minutes, 2 hours, 5 hours). Some districts reported being disconnected after extensive time on hold or going directly to voicemail.
- Districts received conflicting information. ETS would advise one way, and TEA would advise another.

- Tier 1 responders were unable to answer many questions after district staff was placed on hold for extended time periods. Then they would be forwarded to Tier 2 and sometimes Tier 3 responders.
- ETS would say they would call back with answers and never did.
- Reports of ETS customer service ranged from polite and helpful to unsure and rude.
- There were support ticket (case number) issues but districts received no return/follow-up calls from ETS on how to resolve the problems.
- ETS representatives gave inconsistent or inaccurate information/answers.
- ETS staff was unable to track testing materials in the shipping process.
- The ETS system did not have the capacity for district staff to locate historical student data and test history from Pearson.
- ETS representatives were unfamiliar with the Texas assessment system, thus unable to provide adequate support to school districts.
- Many districts reported that the ETS website was not user-friendly and was difficult and time-consuming to navigate.
- The entire ETS online system crashed a day prior to the test administration.
- ETS call hours were not on Central time and therefore ETS staff often was not available to assist Texas educators when needed.
- ETS provided no advance notice of shipments and no pallet detail lists.
- Many districts were frustrated because the ETS system did not allow campus professionals to view student-testing history as they had been able to in the past.

#### **IV. Shipping Materials**

Responses related to shipping materials are included below.

- Test booklets were shipped to the incorrect address, and in many cases, to the wrong school district or campus. Campus testing materials in some cases were mixed with materials for another campus, and materials were not properly labeled for campus distribution.
- Testing materials did not arrive in a timely manner, and, in some cases, they arrived damaged in damaged boxes. Some boxes were not properly labeled. (In one district, secure testing materials were delivered in a Home Depot box.) Tracking numbers did not matching tracking numbers in the ETS online system.
- It was difficult for districts to track shipments. Staff was unable to get answers from ETS regarding materials received for another district.

- Districts experienced significant delays in receiving Braille materials. ETS was unable to locate orders. Materials were shipped in unmarked boxes and therefore opened by individuals without security training.
- Secure materials were left at wrong locations. The packaging was not clearly marked or labeled. There were too many unnecessary packages with little or no information included.
- There was difficulty in getting answers or return calls regarding missing or delayed shipments.

#### **V. Other Issues**

Other responses highlighted issues that seemed to be most detrimental to students. It was noted by many that in the 10 to 30 years they had spent working through various iterations of the state test, the problems with this year's tests were the most egregious. Responses overwhelmingly indicated that the myriad of problems before, during, and after testing brought into question the validity, accuracy, and security of student results. A brief summary of those issues is included below.

- Student score reports that were missing were still not received by districts weeks after testing was concluded, causing anxiety for students and their parents. As noted, *"We are very disappointed, and we expect to hold kids accountable when the system has failed them?"*
- There was not a process for verifying updates or corrections to students' data, identification, testing history, etc. Also, since the TELPAS and STAAR-A have different platforms, it was asked *"How will it be confirmed that all student data is up to date across the board?"* Another example of information not being up to date identified students who had already taken a test in December, but were shown to be taking the test for the first time in March.
- Many indicated there were serious quality control problems such as social studies and science test columns flipped, answer document paper that was too thin and easily torn, files that were not pre-coded, non-standard shipping boxes, and delays in receipt of test materials.
- Some noted that items pertinent to testing were never made available. For example, *"ETS was supposed to develop a teacher portal where districts could access student testing history. This still hasn't happened."*
- There was grave concern that student outcomes negatively affected by the flawed online test environment will be masked. *"We are very concerned that the scope of students affected will not be reflected in any data file. Testing sessions that were interrupted may appear to be complete, when they were actually compromised by excessive anxiety on part of the students."*
- Several survey respondents noted that students in special populations were not reported, or not reported accurately, including gifted and talented (GT), special education, and Limited English Proficient students. *"Our 5<sup>th</sup> grade reports had zero GT students, when we actually have 35 GT students."*
- Grave concerns were expressed that high school students who are dependent on the test results to graduate were completely let down by the system due to scoring errors. *"Some were failed that actually passed, and the May results will not arrive until after graduation."* Other problems included test administration errors, or poorly constructed procedures to register transfer students. For example, a student on track to graduate enrolled in a new district immediately prior to the December 2015 EOC administration. The receiving district struggled to get test history in time to

register the student as needed for the EOC. In another case, a district had five December tests rescored, and the rescores showed that one student had actually passed the English I EOC. This caused the teachers, students, and parents to have lack of faith in the system.

- Several questioned the validity and reliability of the March STAAR grade 8 reading and math tests because students who “*historically and consistently reach Level III-Advanced*” did not do so on this administration.
- District testing coordinators could not register transfer students without contact and approval of the students’ previous districts (previously the process allowed the district testing coordinator to register a new student). Frustration was expressed that campus testing coordinators could no longer access student test history at all.
- Test administrators who are already instructed to monitor for cheating, unallowable items, and other important issues were told to document the time a student took to stretch in one-minute segments, and to document the amount of time a restroom break took.
- Expectations for district staff continue to rise, yet many felt TEA and ETS were not being held to the same standard. As one response noted, “*We would be required to do a needs assessment, an improvement plan, a plan of action, and tons of paperwork for years trying to explain what had happened and how we were going to fix it.*”
- This survey response sums up the comments in this category well: “*Our main concern is the way these issues have and will negatively impact our students and community, not only on accountability ratings but on the already controversial idea of testing and how it affects the well-being of our children. With the expectation on districts to hold the test with high standards of integrity, security, and confidentiality, we expect the same from both TEA and ETS.*”

We appreciate your continuing focus on the critical issues related to STAAR administration and hope that these concerns will be thoroughly considered as you determine how STAAR results can be used in this year’s accountability ratings. In the final analysis, parents, students, teachers, and administrators must have a high level of confidence in the system for it to be successful.

Sincerely,



Johnny L. Veselka  
Executive Director