



ADMINISTRATIVE PROCEDURE

TEST SECURITY AND DATA REPORTING

AP 6139
Effective Date:
September 13, 2024

- I. **PURPOSE:** This administrative procedure on test administration and data reporting provides for the security, monitoring, and storage of all testing and survey materials before, during, and after test or survey administrations and the adherence to approved state and school district testing guidelines.
- II. **POLICY:**
- A. The Board of Education (Board) has authorized the Superintendent to designate required school system personnel to implement the procedures for test administration and data reporting required by the Maryland State Department of Education (MSDE).
 - B. The Superintendent shall report to the Board scores on state-mandated tests for each school and for the school system as a whole. Scores for Prince George’s County Public Schools (PGCPS) on all state-mandated tests must be reported to the school, community, and the public in a timely manner. (Board Policies 5124.1 and 6139)
- III. **DEFINITIONS:**
- A. *Accommodator* – school staff member who has been trained to provide accommodations to a student with a IEP, 504, or ELL plan
 - B. *Local Accountability Coordinator (LAC)* – The LAC is designated in each district and assumes responsibility for the implementation of each test administration in each school together with any established test security policies.
 - C. *Proctor* – school staff member who has been trained to monitor a testing session under the supervision of the test administrator

- D. *School Test Coordinator (STC)* – The school test coordinator in each school building is directly responsible for ensuring the integrity and validity of each test administration
- E. *Test Administrator (TA)* – /The test administrator is trained by the STC manages the actual test administration in the classroom by following the procedures outlined in the Test Administration Manual.
- F. Multi-state Consortium testing – These are vendor assessments that are not A.

IV. **PROCEDURES:**

A. Applicability

1. Local school systems are required to develop policies and procedures concerning test administration and data reporting for programs administered by or through the MSDE including, but not limited to:
 - a. Tests
 - 1) The Maryland Comprehensive Assessment Program (MCAP) for English and Language Arts and Mathematics.
 - 2) The Maryland Integrated Science Assessment (MISA) for grades 5 and 8.
 - 3) The Maryland State Social Studies Assessment for grade 8.
 - 4) The Comprehensive Assessment Program (MCAP for Alternate Assessments in English/Language Arts, Mathematics, and Science.
 - 5) The High School Assessment for Science (LS MISA).
 - 6) The High School Assessment (Government)
 - 7) The Kindergarten Readiness Assessment (KRA).
 - 8). The Kindergarten Readiness Assessment (KRA)
 - 9) The English Language Proficiency Assessment (ELPA) ACCESS for ELLs.
 - 10) The norm-referenced test or tests in use by the state.
 - 11) Thee Educator Credentialing Tests.

- 12) Other assessment and survey instruments that are required by the MSDE and/or PGCPS.

B. Test Administration and Security

1. Appropriate test administration shall provide for:
 - a. The security of the materials during testing and the storage under lock and key of all secure tests and test materials in all versions, including, but not limited to, answer keys, audio tapes, videotapes, compact discs (CDs), and examinee answer documents, before, during, and after testing. The STC is responsible for security of test materials.
 - b. The administration of tests and the monitoring of test administrations as explained in any test administrator manuals and test coordinator manuals and any other training provided by the STC.
 - c. Training, at least annually, of appropriate personnel on test administration policy and procedures.
 - d. The prohibition of electronic devices, including personal devices (unless required for testing or administrative purposes) in testing rooms during testing.
 - e. The retention of an archival document for a minimum of six (6) years after the date of test administration, containing the following information for each testing group each testing day:
 - 1) Name and student identification number for each student;
 - 2) School and system names and identifiers;
 - 3) Names of the test administrators, examiners, accommodators, and proctors; and
 - 4) Unique test document identification number for each student for paper testing only.
 - f. The STC is responsible for the creation of their school's testing calendar following the specified testing windows for each administration on the PGCPS testing calendar. This is done in collaboration with school administration.
2. Test Administration and Certification of Training Forms

- a. PGCPs shall use, as appropriate, a test administration and certification of training form and a nondisclosure agreement, both provided by MSDE, for PGCPs employees.
- b. Before initially handling any test materials for each test administration, and annually after that, each individual directly or indirectly involved shall sign a test administration and certification of training form or a nondisclosure agreement, whichever is applicable.
- c. All signed forms and agreements shall be retained by PGCPs for the duration of the individual's employment or relationship with PGCPs. These signed forms and agreements are archived in each school.
- d. Forms and agreements may be signed electronically using any means approved by the MSDE.
- e. PGCPs may develop and adopt procedures for the secure electronic archival of paper documents.

3. Staff Roles

- a. All personnel involved in testing must be PGCPs employees, be trained for their role, meet the requirements of their role as described in this administrative procedure, and sign a MSDE approved Test Administration and Certification of Training form.
- b. PGCPs personnel may not serve as a Test Administrator, Proctor, or Accommodator in the same testing room as a student who is a family member or who resides within the same dwelling.
- c. Local Accountability Coordinator (LAC)
 - 1) The Superintendent shall designate annually one (1) individual to serve as the Local Accountability Coordinator (LAC).
 - 2) The LAC shall have oversight of the:
 - a) Procurement of test instruments that are used in testing programs administered by or through the Maryland State Board of Education (MSB);
 - b) Organization, implementation, orientation, and verification of the Maryland education assessment programs in PGCPs; and

- c) Administration and security of state-mandated assessments.
 - d) School Test Coordinators (STCs)
- 3) The name of the LAC shall be provided, in writing, to the MSDE within ten (10) days of the Superintendent’s designation. The Chief of Accountability shall notify the MSDE of the name of the LAC.
- d. School Test Coordinators (STCs)
- 1) The principal shall designate one individual per school to serve as the Primary School Test Coordinator (STC) and designate another individual to serve as the Alternate School Test Coordinator (ALT STC) (COMAR 13A.03.04.04).
 - 2) A Principal may not serve as the STC unless permission has been granted by the MSDE.
 - 3) STCs shall possess a valid MSDE certificate for professional school staff. Eligible STCs include the following:
 - a) State-certified teachers; and
 - b) State-certified guidance counselors, library media specialists, school psychologists, pupil personnel workers, and school administrators (other than the Principal).
 - 4) The STC shall:
 - a) Have responsibility for training and supervising school personnel in test administration policy and procedures; and
 - b) Be the primary point of contact with the LAC, the Department of Testing, Research and Evaluation, and the MSDE during the administration of all state and district assessments.
 - 5) The principal must also designate (one or both) an:
 - a) Alternate STC per school.
- e. Test Administrators (TAs)
- 1) Test Administrators (TAs) are selected by each public school’s Principal subject to review and approval by the Superintendent.

- 2) For any multi-state assessment consortium testing, TAs shall possess a valid MSDE certificate for professional school staff.

f. Proctors

- 1) The use of proctors is a PGCPS decision.
- 2) A proctor shall be under the direct supervision of an eligible TA.
- 3) TAs may also serve as proctors.
- 4) Proctors may include:
 - a) instructional assistants and aides; or
 - b) substitutes or other staff members who are PGCPS employees.

g. Accommodators

- 1) Accommodators may provide accommodations to students during testing.
- 2) Accommodators shall be under the direct supervision of an eligible TA.
- 3) Accommodators may include:
 - a) Test Administrators;
 - b) instructional assistants and aides; or
 - c) substitutes or other staff members who are PGCPS employees.

- h. Implementation of MSDE testing programs further requires that all individuals adhere to the procedures governing the Maryland School Performance Program and all operating manuals governing mandated testing programs. Each assessment has their own set of test administration manuals.

C. Testing Behavior Violations

1. It is a violation of test security for any staff member to fail to follow test administration policies or procedures promulgated by the Board or the MSBE and published in test administration manuals and related materials for the mandatory tests administered by or through the MSBE to students or educators.

2. Furthermore, it is a violation of test security for a staff member to:
 - a. Give students access to secure test items or materials before testing;
 - b. Give unauthorized individuals access to secure test items or materials;
 - c. Copy, reproduce, use, or otherwise disclose in any manner inconsistent with test security regulations and procedures any portion of secure test materials;
 - d. Provide answer keys or answers orally, in writing, or by any other means, to students;
 - e. Coach students during testing by giving them answers to test questions or otherwise directing or guiding their responses or altering or interfering with examinees' responses in any way;
 - f. Fail to follow security regulations for distribution and return of secure test materials, or fail to account for all secure test materials before, during, and after testing;
 - g. Fail to properly monitor test administration, including permitting inappropriate collaboration between or among individuals;
 - h. Participate in, direct, aid, counsel, assist, encourage, or fail to report any of the acts prohibited by this administrative procedure or by the MSDE;
 - i. Refuse to disclose information regarding test security violations to the STC;
 - j. Administer state or school district-mandated tests on dates other than those specified by the MSDE or PGCPSS; and
 - k. Refuse or fail to sign and submit test administration certification of training forms and non-disclosure agreements as appropriate.
3. The PGCPSS-appointed LAC shall investigate any allegation of violations of mandatory test security and report the results to the MSDE in a timely fashion, as required.
4. If a person violates the provisions of this administrative procedure, Board Policy 6139, or COMAR 13A.03.04, the MSDE may take administrative action beyond that taken by the PGCPSS Superintendent, including suspension or revocation of administrative or teaching credentials, or both, and may seek to recover the costs incurred as a result of the violation.

D. Data Reporting

1. The Department of Testing, Research and Evaluation is responsible for all data reporting. MSDE requires PGCPSS to report the following data as described in COMAR 13A.01.04 and other measures used to determine the availability of services and funding.

- a. Student results from state assessments must be reported to parents/ guardians of students within 30 days of receipt by PGCPS, but no later than September 30 for spring assessment results.
 - b. Delivery of assessment results to parents/guardians by the school of attendance may be accomplished by one or more of the following methods:
 - 1) First class mail;
 - 2) Backpack or student folder, but a prior robocall or other electronic communication, such as a school newsletter, to parents/guardian must be made in advance announcing expected dates for distribution;
 - 3) Personally, via a parent/teacher conference; or
 - 4) Electronically, through the communication system used by PGCPS to keep parents informed.
2. PGCPS must provide training of appropriate personnel on data reporting procedures.
 3. All district staff are responsible for using assessment data to inform instructional decisions for individual students or groups.

E. Data Suppression

1. Local school systems are required to develop suppression rules to apply when reporting publicly shared data. Development of these rules was informed by practices of other Maryland local education agencies (LEAs), the MSDE, and the Institute of Education Sciences (IES), and Family Educational Rights and Privacy Act (FERPA).
2. Suppression rules are used to protect students by ensuring that publicly shared data cannot reveal personally identifiable information about individual students. Publicly shared data is defined as information that has been publicly released by the MSDE for public consumption and can be shared, used, reused and redistributed without restriction. The application of suppression rules will vary based on the data being presented and legal requirements for sharing specific types of data.
3. In the suppression rules below, the numerator refers to the number of students who achieve a given outcome, and the denominator refers to the number of students who have the potential to have an outcome for a given data set. For example, if the data set is assessment data, the numerator would be the number of students who were

proficient or not proficient on the assessment, and the denominator is the number of students who took the assessment.

4. Suppression rules applicable to all public data files (unless otherwise noted below):
 - a. Numerator counts of students are shown (*e.g.*, # proficient, # of students chronically absent) if \geq (greater than) 20.
 - b. Denominator counts (total number of students in a group) are displayed, but suppressed as follows:
 - 1) The entire row is suppressed using a * when the group size \leq equal to or less than) 20. The count of students is presented as 'N \leq 20' rather than displaying the exact count.
 - c. Percentage/proportion decimals are rounded to a maximum precision of one decimal place (*e.g.*, 93.6%). Less precision is acceptable, such as to the nearest whole number (94%), but not more (*e.g.*, 93.68%).
 - d. The affirmative of all binary groups (SWD: Y and not SWD: N) are reported.
 - e. Percentages that are equal to or less than 5% or greater than 95% are presented as banded values ('< 5%' or ' \geq 95%') rather than displaying exact percentages. Additional suppression may be required for data sets not disclosed as part of required, publicly available reports to federal or state educational agencies or through PGCPS' own validated public reports on achievement and accountability data. Such data sets will be suppressed to protect student confidentiality when numerator counts are less than 20 students with a given outcome, despite those percentages being greater than 5%.
 - f. Every possible student and service group are represented, even if no students exist in that group, and the row is suppressed as described above (N \leq 20, so the entire row is suppressed using a *).
 - g. Care must be taken to ensure that suppressed fields cannot be recovered from other unsuppressed information in a report. For example, consider MCAP Performance Level (PL) reporting for the school below:

PL 1	25.0
PL 2	75.0
PL 3	≤ 5.0
PL 4	≤ 5.0
PLs 3/4	≤ 5.0

1) In this case, it is now known exactly 0% of students got a level 3 or 4 because the levels 1-2 sum to 100%. This makes the suppression to ‘≤ 5%’ insufficient as the true value can be calculated from other totals. To avoid this issue, combine or regroup data into a smaller number of categories (such as % Levels 1-2 vs. % Levels 3-4) rather than displaying each individual level.

5. Public Attendance data uses the above suppression rules with the following changes:

- a. The attendance rate is suppressed (using *) if there are not at least *20 students* with at least 10 days of enrollment in each group/row in both attendance and chronic absence reporting.

6. Public Enrollment data uses the above suppression rules with the following changes:

- a. Total counts of students in each grade level are never suppressed, even when they are ≤ 20. The entire row of student group data (% SWD, EL, etc.) is suppressed with a * when ≤ 20.

7. Public Suspension data uses the above suppression rules with the following changes:

- a. Counts of suspensions will be suppressed if there are ≤ 20 suspension incidents in a given school or student group.

F. Data Collection and Reporting Violations

1. It is a violation for any person, school, or school system to:

- a. Fail to report test scores, numbers of students tested, and other indicators of test performance on mandatory tests administered by or through the MSBE, as well as all other data elements reported to the MSDE;
- b. Report incorrect or otherwise inaccurate test scores, numbers of students tested, other indicators of test performance, and participation on mandatory tests

administered by or through the MSBE, as well as all other data elements reported to MSDE; or

- c. Exclude a student or students from participation in mandatory tests administered by or through the MSBE except in accordance with MSDE approved procedures.
2. PGCPS shall investigate any allegation involving data collection or reporting violations and report the results to MSDE in a timely fashion, either at its own initiative or at the request of MSDE.

G. Sanctions for Violations

1. Invalidation of Test Scores or Other Data

- a. An individual shall adhere to all procedures specified in all operating manuals and related materials governing the Maryland School Performance Program, including the mandated testing programs.
- b. The MSDE:
 - 1) Shall establish procedures to identify:
 - a) Improbable test score gains or improbable changes in data in consecutive years;
 - b) Situation in which inappropriate collaboration between or among individuals occurs during the test administration or data collection and reporting; and
 - c) Any other situation which may results in the invalidation of test results or other data; and
 - 2) May invalidate test scores or other data that reflect improbably gains which cannot be satisfactorily explained through changes in the student population or instruction.
- c. The invalidation of test results or other data because of a breach of security, or action of the SMBE, also invalidates any graduation, programmatic, or evaluation criteria dependent upon these data or test results.
- d. The MSDE may invalidate test results of a student who causes, allows, or is otherwise involved in the presentation of forged, counterfeit, or altered identification for the purpose of obtaining admission to a test administration site for any of the aforementioned tests, or who knowingly engages in any prohibited

activity during testing. Students whose scores are invalidated may be ineligible to retake the test until the next official testing opportunity.

- e. A student who engages in any activities during testing which result in invalidation of scores may be ineligible to retake the test until the next official testing opportunity.
- f. All PGCPs central office and school-based personnel whose duties involve either test administration or data collection and reporting shall be held accountable for compliance with all of the requirements described in the Board policy, this administrative procedure, and MSDE materials.

2. Other Sanctions

- a. A testing behavior violation as described in section IV.C., a data collection and reporting violation as described in section IV.F., or a violation of any other provision of the Board policy, this administrative procedure, or MSDE materials, constitutes misconduct, insubordination, or neglect of duty for which:
 - 1) PGCPs may impose personnel sanctions;
 - 2) The administrative credentials, teaching credentials, or both, of the violator may be suspended or revoked under COMAR 13A.12.05;
 - 3) The individual school(s) and/or PGCPs may be censured; and
 - 4) The MSDE may recover costs incurred as the result of the violation.

3. Mitigating Circumstances

- a. Any mitigating circumstances shall be considered before a sanction is imposed for a testing behavior violation, a data collection and reporting violation, or violation of any other provision of Board policy, this administrative procedure, or MSDE materials.
- b. An individual may be sanctioned if the individual failed to take appropriate action after learning about the violation.

4. Reasonable Person Standard

All conduct with respect to test administration and data reporting will be reviewed under a reasonable person standard (what a reasonable person would do under similar circumstances).

5. Whistleblower Protection

- a. PGCPS shall not take any personnel action as retaliation against an employee who reports information that the employee reasonably believes involves a test security violation under this administrative procedure.
- b. PGCPS may take personnel action against an employee if after an investigation it concludes that the employee was involved in the reported test security violation.

V. **MONITORING AND COMPLIANCE:**

A. In an effort to ensure that all test security protocols are followed during each test administration, the following monitoring tools and processes will be utilized annually:

1. The Department of Testing, Research and Evaluation (DTRE) will:
 - a. Schedule trainings and/or provide training documentation in test security and administration for any scheduled state or district assessments to the STC and ALT STC from each school as appropriate to each administration;
 - b. Monitor each test administration via phone calls, emails, and personal calls to STCs;
 - c. Monitor the progression of any on-line test administration through the vendor platform; and
 - d. Review all testing irregularities and investigate any testing violations following all MSDE protocols and processes
2. Principals are responsible for:
 - a. Appointing both an STC and ALT STC for their building; and
 - b. Monitoring, along with STCs, each test administration in the school.
3. STCs and ALT STCs are required to:
 - a. Attend any scheduled training presented by DTRE for any test administration;
 - b. Provide general test security training to all staff each year by October 15 of each year and maintain training attendance sheets for at least six (6) years;
 - c. Provide test administration training for any state or district assessment to any staff

directly involved in this administration as a test administrator, proctor, or accommodator;

- d. Monitor, along with principals, each test administration in the school; and
 - e. Report incidents of potential testing irregularities to the appropriate staff at DTRE within twenty-four (24) business hours. The STC provides to DTRE the results of their investigation for review and action by DTRE.
- 4. Instructional Directors and Associate Area Superintendents will ensure that each principal appoints an STC and ALT STC, trainings are provided in each school building for each administration, and all required trainings are attended.
 - 5. The LAC will report the results of any investigation regarding testing irregularities to MSDE in a timely fashion, as required. Depending on the nature of the irregularity, this may be reported to ELRO.

VI. LEGAL REFERENCE: Code of Maryland Regulations (COMAR 13A.03.04)

VII. MAINTENANCE AND UPDATE OF THIS ADMINISTRATIVE PROCEDURE:
This administrative procedure originates with the Division of Accountability and will be updated as needed

VIII. CANCELLATIONS AND SUPERSEDURES: This administrative procedure cancels and supersedes Administrative Procedure 6129, dated November 2, 2020

IX. EFFECTIVE DATE: September 13, 2024

Attachments: