State of Arizona
Department of Education

January 6, 2015

Ken Turer, Principal
James Sandoval Preparatory High School/Crown Pointe High School
4802 North 59th Ave.
Phoenix, AZ 85033
Via email: ken.turer@crownpoinths.net

Re: Notice of Findings of Accountability Investigation

Dear Principal Turer:

The purpose of this letter is to notify you of the results of the Arizona Department of Education's investigation regarding James Sandoval High School. As described below, the Department delayed calculation of the school's 2014 A-F Letter Grade after certain concerns were raised regarding the previous school year's AIMS testing process and results. After conducting a thorough investigation of the 2014 AIMS testing process and results at James Sandoval, the Department has elected not to recalculate the school's 2014 A-F Letter Grade because the school does not meet the Department's criteria for recalculation of a Letter Grade, as explained below. However, the Department is concerned about Sandoval's AIMS testing process in school year 2012-13, as it pertains to students identified below.

The Department conducted this investigation pursuant to A.R.S. § 15-241. That statute requires the Department to compile annual achievement profiles for public schools and to issue a corresponding A-F classification. A.R.S. § 15-241(A), (H). It further requires that the annual achievement profiles include academic performance indicators, which must rely on students' performance on statewide assessments. A.R.S. § 15-241(D), (G). In 2013 and 2014, the AIMS Reading and Mathematics test results were the primary instrument used to measure academic performance. In order to uphold the integrity of the accountability system, the Department must ensure that all underlying data used in the calculation accurately reflects student achievement.

As you know, the Department, by letter dated July 25, 2014, notified James Sandoval High School that its 2014 A-F Letter Grade had not been calculated because of concerns that data related to some AIMS test results from the previous year (2013) showed certain irregularities. More specifically, the Department initiated its investigation based on the following criteria:

1. The 2013 Mark Discrimination Report for the Spring AIMS Mathematics test identified James Sandoval High School's "Cohort 2015 – Sophomores" group as having wrong-to-right erasures at a rate that met or exceeded Pearson's "alert threshold" of three standard deviations above the state mean. The alert threshold for AIMS High School Mathematics is 2.715. The mean wrong-to-right erasures for the 19 students in this group was 7.789, compared to a state average of 0.226 for all students taking the AIMS High School Mathematics test.

2. A signed letter suggesting testing improprieties at the school caused ADE to more closely examine assessment results from the 2013 AIMS test administration. After receiving a "D" letter grade in 2012, the school's letter grade increased to a "B" in 2013.

After this information suggesting possible testing irregularities at Sandoval was brought to the Department's attention, the Department examined test records and student and school performance at Sandoval for both the 2013 and 2014 AIMS test administration cycles.

The Department began its examination with a review of the Pearson Mark Discrimination Report for both years. The Mark Discrimination Report examines the number of erasures on each test record and compares them to the state mean of erasures on similar assessment records. Information about how Pearson detects erasures may be useful. Pearson scanners detect various levels of shadedness. The shadedness is the degree to which the graphite mark left by a pencil is detected. Only the graphite marks made within each question's answer options are captured. Stray marks outside of the answer options cannot impact scoring. During scanning, the darkest mark is identified as the student's response to the question, and the next darkest mark located within the answer area is noted as an erasure.

As noted above, Sandoval did not appear on the 2014 Mark Discrimination Report. Consequently, the Department will not recalculate Sandoval's 2014 Letter Grade.

The Department's review of Sandoval's 2013 AIMS test results, however, is concerning. Because the 2013 Letter Grade had already been issued by the time the Department was made aware of potential issues, the Department will not recalculate the 2013 Letter Grade. But, the Department is describing its concerns in detail here, with the expectation that Sandoval will conduct its own investigation of this information and, more importantly, ensure that all students identified here have the requisite skills for graduation and success after graduation.

Because the 2013 Mark Discrimination Report identified the Cohort 2015 Sophomores Group as having a significantly higher-than-average number of erasures, the Department examined the test records in that group more closely. The Department then provided James Sandoval High School with all student-level data related to erasures. James Sandoval High School also received information regarding how to identify and investigate questionable accountability activity directly via email dated July 28th. The Department provided the same information to Local Education Agencies ("LEAs") throughout the state via the Accountability section's webpage on the Department's website. *(See Components of a Rigorous Investigation to Identify and Investigate Accountability Fraudulent Activity).* The Department gave James Sandoval High School the opportunity to conduct its own investigation of this matter or to allow the Department to investigate. A report showing the erasure marks on student test records was provided to James Sandoval High School by the Department for purposes of investigation.

James Sandoval High School elected to conduct its own investigation regarding the test irregularities detected by Pearson and test protocol violations described in the letter of concern. The Department appreciates James Sandoval High School's cooperation with this investigation. The Department has carefully evaluated the information that James Sandoval High School has

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provided. It assembled a team that includes the Department's Chief Accountability Officer, its Chief Data Officer, the Deputy Associate Superintendent of Assessments, and the Test Security Officer; these individuals are highly trained in standardized testing, education research, and test security, as well as child learning theory. In addition to the information submitted by the school, these individuals reviewed all related student test data within the Department.

The Department identified 15 individual Mathematics test records from the 2013 AIMS administration as being of concern. (A list of the SAIS numbers for the students whose test results meet the following criteria has been included with this report.) These records are of concern for the following reasons: First, the number of wrong-to-right erasures on each identified test record exceeds the state's erasure average for that grade and subject by five standard deviations. Second, the Department examined the proportion of wrong-to-right erasures as compared to total erasures for each identified record, and only identified those test records where the percentage of wrong-to right erasures as compared to total erasures for the record exceeded 55%. To translate these statistics, the Department identified those Mathematics test records where there were four or more wrong-to-right erasures.

MATHEMATICS	READING
4 or more wrong-to-right erasures = State mean + 5 standard deviations	3 or more wrong-to-right erasures = State mean + 5 Standard deviations
56-100% of all erasures were wrong-to-right	56-100% of all erasures were wrong-to-right

The Department also considered the following information in analyzing the 2013 assessment data and erasure reports. The Department first considered typical test-taking behavior for Arizona students in high school Mathematics. According to statewide data from current as well as prior years, students do not typically erase answers on the AIMS assessment. In fact, statewide in Arizona, for Mathematics about 70% of students in high school did not erase a single item on the 2013 AIMS. While "Cohort 2015 – Sophomores" account for 37% of all Mathematics tests administered at James Sandoval High School, this single group accounts for 92% of the total erasures in Mathematics.

Since students statewide infrequently erase answers on the AIMS Mathematics assessments, it is especially concerning that many "Cohort 2015 – Sophomores" students at James Sandoval High School chose the correct answer successfully after initially selecting the wrong answer. About 55% of all erasures in the state are wrong-to-right, but students in "Cohort 2015 – Sophomores" corrected their responses to the right answer 80% of the time.

The Department also compared the number of wrong-to-right erasures in the Mathematics "Cohort 2015 – Sophomores" group that met or exceeded the State's invalidation threshold (that is, the number of tests where the number of wrong-to-right erasures was five or more standard deviations above the state mean) to the number of tests in high schools in Arizona that met or exceeded the State's invalidation threshold in Mathematics. More specifically, there are about 85,000 AIMS test records per grade and subject statewide; fewer than .001% of all high school Mathematics tests in the state were administered at James Sandoval High School. For the

"Cohort 2015 – Sophomores" group, 74% of the students exceeded five standard deviations for Mathematics in wrong-to-right erasures.

The Department also considered the erasures specific to items and groups, to determine whether the erasures appeared random or if there was a pattern of erasures for a specific item. It examined the 186 total erasures for James Sandoval High School students in the "Cohort 2015 – Sophomores" group. Of the 186 erasures in the group, there was one test record where there were no erasures and there was one test record where there was one erasure. For the remaining 184 erasures, there appeared to be a pattern, in that there were a number of instances in which there were several test records that had erasures for the same item. Furthermore, for all "Cohort 2015 – Sophomores" students at James Sandoval High School, the right answer was reselected 148 times throughout the entire Mathematics assessment. Moreover, 138 of the 148 wrong-to-right erasures appeared on 34 common items. To clarify, 93% of the wrong-to-right erasures appeared on 34 of the possible 85 test items.

The Department is aware that teachers' encouragement to check work during the assessment may cue students into making answer selections they may not otherwise make and that such encouragement can result in students making wrong-to-right, right-to-wrong, or wrong-to-wrong erasures. However, providing any cues during the test which might lead students to identify correct answers on the AIMS assessment violates test administration policies. In its findings, the school reports an above average number of wrong-to-wrong as well as right-to-wrong erasures among the test records in question. While the number of right-to-wrong and wrong-to-wrong erasures were also six and seven times the state average, the number of wrong-to-right erasures was more than 26 times the state average.

The Department was provided a copy of a letter addressed to Deanna Rowe, Executive Director of the Arizona State Board for Charter Schools. In the letter dated March 4, 2014, an individual who is not employed by the high school details separate incidents where a student as well as a staff member discuss violations of test administration protocol which the letter describes as "cheating." The outcome of this investigation was not influenced by other issues described in this letter, and the primary focus has been the validity of the assessment data that was used in the 2013 letter grade. However, the timeframe of alleged testing improprieties in this letter coincides with the single year this high school was flagged for wrong-to-right erasures above the Pearson alert threshold.

Although the school administered high school AIMS Mathematics assessments in the 2012 as well as the 2014 fiscal years, the school only appears on the *Mark Discrimination Report* for the 2012-2013 school year. This single year produced much higher proficiency rates for this subject and grade level than in the 2011-2012 as well as 2013-2014 school years; 13 out of the 15 students tested proficient in Mathematics. This is in stark contrast to their last AIMS assessment where only 2 out of the 15 students achieved a proficient score on the Grade 8 Mathematics assessment. The test records from the 2013 test administration which exceeded five standard deviations also varied significantly from test results within the high school itself. In 2011, 2012, and 2014, about half of the Grade 10 cohort at James Sandoval High School tested proficient in

Mathematics. However, 13 out of 15 or 87% of the identified test records resulted in proficient scores.

The Department strongly urges the school to ensure the students identified during this process meet the AIMS high school grade level standard required for graduation. The school may choose to verify student achievement levels by retesting on AIMS during the Spring 2015 administration or using other data (i.e. ACT, SAT, course completion, course grades, etc.) to confirm students are prepared to exit secondary education. If the school finds reason to invalidate the test results in question, the Department notifies you that you are required, pursuant to A.R.S. § 15-743(E), to inform the parents and guardians of those pupils whose scores are not valid. In addition, James Sandoval High School must ensure that its notice to the public of its students' test scores accurately describe student achievement if the school finds reason to invalidate the test results in question. (Such disclosure should be made consistent with the Family Education Rights and Privacy Act, 20 U.S.C. § 1232g.) Please note that the Department will provide a copy of these findings to the James Sandoval High School Governing Board and the Arizona Board for Charter Schools for informational purposes.

The Department expects that James Sandoval High School will conduct such further investigation as is necessary to find out what caused these test irregularities, correct any problems that it identifies, make any necessary changes to ensure that no such irregularities occur in the future, and take all appropriate action against any individual determined to have acted inappropriately. If you have any additional questions, please feel free to contact Chief Accountability Officer, Yovhane Metcalfe, at Yovhane.Metcalfe@azed.gov. If you have any additional questions regarding these findings, please feel free to contact the Director of Legal Services, Carrie O'Brien, at Carrie.Obrien@azed.gov.

Sincerely,

Jennifer Johnson

Jennifer Johnson, Ed.D.
Deputy Superintendent of Programs and Policy

Leila Williams, Ph.D.
Associate Superintendent of Assessments and Accountability

CC: Members of the James Sandoval High School Governing Board
Arizona State Board for Charter Schools
Leslie Kyman Cooper, Assistant Attorney General
Jordan Ellel, Assistant Attorney General

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