

# Georgia Milestones Assessment Audit Process Overview

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*Updated: December 15, 2017*

Prepared by:



## Executive Summary

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*(Beginning with the 2015-2016 Georgia Milestones test administrations, the Erasure Analysis became known as the Answer Change Analysis to better reflect the transition of test-takers from a paper and pencil testing format to an online testing format.)*

The Governor's Office of Student Achievement (GOSA) serves as the reporting and accountability agency for education in Georgia. As such, GOSA is charged by law with inspecting academic records of schools to ensure that education institutions are faithful to performance accountability requirements. Through an academic audit, GOSA reviews student assessment data and other school records reported to the State to confirm accuracy and explore the effectiveness of local school initiatives in improving achievement.

Data from the state standardized assessments are intended to assist in making educational policy decisions and provide a measure of students' academic performance as well as the schools' effectiveness and adherence to the State's prescribed standards. The Georgia Department of Education (GaDOE)'s Assessment Division oversees the development and administration of the End of Grade (EOG) for grades 3 to 8 and End of Course (EOC) assessments in eight high school courses. The State's testing vendor, Data Recognition Corporation (DRC) is responsible for scoring the exams and reporting the results to the Local Education Agency (LEA).

Given the importance of these assessments, GOSA, as part of its statutory role, partners with DRC to conduct a comprehensive examination of all statewide answer documents for all EOG and EOC assessments. The analysis focuses on identifying classrooms and schools where the number of wrong answers that have been changed to right answers on individual student tests is well above the state average. It is conducted in English-Language Arts, Mathematics, Science, and Social Studies in grades 3 through 8 and the following eight high school courses: Ninth Grade Literature and Composition, American Literature and Composition, Coordinate Algebra, Analytic Geometry, Physical Science, Biology, U.S. History, and Economics. For the first time, this analysis included assessments that were administered online.

For the 2016-2017 school year, in addition to the answer change analysis, DRC conducted the Unusual Response Patterns analysis using an approach described by Jacob and Levitt (2003). This methodology includes a combination of two indices: (1) unexpected test score fluctuations across years using a cohort of students and (2) unexpected patterns in student answers. This analysis is only conducted for EOG English and Mathematics.

It is important to note that the results of both analyses are used as an initial flag to spur further investigation of many indicators to determine if any cheating occurred. The results do not indicate that cheating necessarily occurred.

Using the DRC Answer Change Analysis and Unusual Response Pattern Analysis, GOSA identifies schools for an internal desktop audit based on the following criteria:

*Answer Change Analysis:*

EOG (Grades 3-8)

- Five percent or more of classrooms in a school are flagged at four standard deviations or greater, OR
- One classroom is flagged at seven standard deviations or greater, OR

EOC (Grades 9-12)

*Answer Change Analysis:*

- Five percent or more of classrooms in a school are flagged at five standard deviations or greater, OR
- One classroom is flagged at seven standard deviations or greater.

*Unusual Response Pattern Analysis:*

EOG (Grades 4-8)<sup>1</sup>

- Schools where two or more testing groups had test score gains and unusual response patterns that were in the 95<sup>th</sup> percentile, OR
- Schools where one testing group had test score gains and unusual response patterns that were in the 99<sup>th</sup> percentile.

With identified schools, GOSA conducts a desktop audit to determine a possible explanation for a flagged school that would remove the need for further inquiry. By narrowing the number of flagged schools, this review allows the state to focus limited monitoring and auditing resources on schools with greatest concern. In this analysis, many school-level factors, outlined in Table 1 in Phase II of this process document, are reviewed holistically and discussed as a team before any determinations are made. Schools are placed in one of two categories: “further inquiry needed,” or “no further inquiry needed.” Schools requiring further inquiry are included in recommendations to the SBOE for inquiry, monitoring, and auditing.

GOSA presents the findings, along with recommendations, annually to the State Board of Education (SBOE). These recommendations, which the SBOE votes to approve, range from requiring local Superintendents to conduct internal investigations to determine the causes of testing irregularities, to requiring that schools rotate teachers during test administration so that they administer the test to students they have not taught. In addition, state monitors are placed in flagged schools during the subsequent spring’s test administration.

GOSA reviews the LEA explanations provided and determines appropriate next steps. When no further inquiry is required for the LEA, GOSA sends a letter to notify the superintendent. For schools that have not been cleared after full investigation, a referral to the Georgia Professional Standards Commission is made by either the LEA or GOSA. The Georgia Professional Standards Commission (GaPSC) is statutorily responsible for regulating professional employees in Georgia’s public schools by investigating

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<sup>1</sup> Each testing group is the total number of students by grade level and subject area (ELA or mathematics) who took a certain test form (A or B) regardless of classroom assignment. For example, all students in a school who took the 4th grade mathematics Georgia Milestones Form A assessment are a testing group.

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allegations of educator misconduct and providing recommendations for disciplinary actions. Once this step is complete, the annual answer change analysis process is complete.

The following report provides a more in-depth overview of GOSA's answer change and unusual response pattern analyses processes, from assessment administration through the closeout of investigations from that administration.

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## **Phase I: Data Collection and Analysis: May through September**

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### **Test Administration**

The main administration for the Milestones EOG occurs in the spring each year. Local Education Agencies submit a ten-day window to administer the test to the Georgia Department of Education's Assessment Division. The window must fall within a six-week period starting with the last week of March through the first week of May. All testing must be completed during this window. The Milestones EOC has a main administration during the fall, spring, and summer semesters. LEAs must submit testing windows for the high school assessment to GaDOE's Assessment Division.

### **Data Collection<sup>2</sup>**

The scoring process begins with accurate scanning:

#### **Answer Changes for Paper Administrations**

The GA Milestones EOG paper-pencil answer documents were processed using high speed 5000i optical scanners which reliably captured document images and optical mark read data. The sophisticated proprietary scoring software system, specifically Optical Mark Recognition (OMR) software, reviews the integrity of each batch of documents scanned according to pre-defined guidelines and services.

The OMR software provides a mechanism for identifying multiple-marks and identification of erasures for scanned data to support answer change analysis. The basis of the answer change analysis is to count erasures for multiple-choice items where two or more responses have been made with a specified intensity. Erasure analyses provide a mechanism to differentiate between three kinds of answer changes: a) wrong-to-wrong, b) right-to-wrong and c) wrong-to-right. Capturing the frequency of answer changes from wrong-to-right can be useful for identifying potential instances of cheating at the student level. Erasure analyses results can be grouped to tentatively identify problems at the classroom and school levels.

#### **Answer Changes for Online Administrations**

The test administration software that delivers the Georgia Milestones assessment system, INSIGHT, captures answer changes during online testing sessions. Similar to paper based administrations where answer changes are determined by examining erasure marks, the INSIGHT system records changes to answers within an online test administration that are made either before leaving an item or upon returning to the item and making a change. Answer change analyses for students testing online also focuses on the three kinds of changes: a) wrong-to-wrong, b) right-to-wrong and c) wrong-to-right. As with paper based erasure analyses, capturing the frequency of answer changes from wrong-to-right can be useful for identifying potential instances of cheating at the student level in online testing. Analyses results can be grouped to tentatively identify problems at the classroom and school levels.

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<sup>2</sup> Much of the data collection and analysis descriptions in this report are extracted from text submitted by Data Recognition Corporation in their answer change analysis reports from 2016.

## Answer Change Analysis Steps

The basis for the answer change analysis is to count erasures in items where an answer choice was erased and replaced with another answer choice; online, an item was selected and then later changed to a different answer choice. Herein, both actions are referred to as an erasure. Often the data captured is useful for identifying cases of cheating. During erasure analysis, two sets of erasures were analyzed: all erasures and wrong-to-right erasures where an incorrect answer choice was erased and replaced with the correct answer choice. Only operational items were used for the answer change analyses implemented for the 2017 Georgia Milestones.

The basic idea underlying the procedure is a statistical test of the null hypothesis ( $H_0$ ) that the mean number of erasures for a class constitutes a random sample from the state distribution of erasures. The hypothesis is tested against the (right-sided) alternative ( $H_1$ ) that the mean number is too high to be explained by random sampling. Classes for which  $H_0$  has to be rejected are flagged for further scrutiny. The central limit theorem in statistics states that the sampling distribution of the mean number of erasures for class  $i$  ( $m_i$ ) is asymptotically normal with mean and standard deviation (SD)

$$\text{mean}(m_i) = \mu \quad (1)$$

$$\text{SD}(m_i) = \frac{\sigma}{\sqrt{n_i}} \quad (2)$$

where  $n_i$  and  $m_i$  denote the size and mean number of erasures for class  $i$ , respectively. In addition,  $\mu$  and  $\sigma$  denote the mean and the SD of the distribution of the number of erasures of the population of individual students in the state of Georgia.

### Milestones EOG

Classes are flagged if their  $m_i$  is larger than  $\mu + 4 \frac{\sigma}{\sqrt{n_i}}$ . Statistically, the flagging criterion set at or

above 4 SDs is conservative. The standard normal table shows that under random sampling, the (asymptotic) probability of a sample mean being more than four SDs above the population mean is around 0.00003. However, rejection of  $H_0$  only indicates that the observed mean number of answer changes is unlikely to be the result of random sampling.

The formula above adjusts the flagging criterion for the number of test takers in a classroom. For example, if the state mean and SD of answer change count are 1.73 and 2.11, respectively, the flagging criterion for a class size of 20 is adjusted to 3.62 ( $1.73 + 4 \frac{2.11}{\sqrt{20}} = 3.62$ ).

This adjustment ensures that the flagging criterion is equally stringent for classes with considerably different numbers of test takers. In addition, it minimizes the probability of false positive (Type I) errors in the statistical test.

### **Milestones EOC**

Classes are flagged if their  $m_i$  is larger than  $\mu + 5 \frac{\sigma}{\sqrt{n_i}}$ . Statistically, the flagging criterion set at or above

5 SDs is conservative. The standard normal table shows that under random sampling the (asymptotic) probability of a sample mean being more than five SDs above the population mean is around 0.0000003. However, rejection of  $H_0$  only indicates that the observed mean number of answer changes is unlikely to be the result of random sampling.

The formula above adjusts the flagging criterion for the number of test takers in a classroom. For example, if the state mean and SD of answer change count are 1.73 and 2.11, respectively, the flagging criterion for a class size of 20 is adjusted to 4.11 ( $1.73 + 5 \frac{2.11}{\sqrt{20}} = 4.11$ ).

As with the EOG, this adjustment ensures that the flagging criterion is equally stringent for classes with considerably different numbers of test takers and minimizes the probability of false positive (Type I) errors.

### **Unusual Response Pattern Analysis (Milestones EOG Only)<sup>3</sup>**

This method includes a combination of two indices: (1) unexpected test score fluctuations across years using a cohort of students and (2) unexpected patterns in student answers. The first indicator ranks each school's average test score gains relative to other schools' gains for a particular grade and subject. The second index ranks schools regarding unexpected patterns in student answers. Schools are ranked on four measures that are combined to provide an overall index of unexpected patterns in student answers. The analyses identifies the:

- Most unlikely block of identical answers,
- Degree of correlation in student answers across the test,
- Degree of variance in the correlation of responses across items, and
- Extent to which student responses were congruent with respect to item difficulty and student ability.

It was possible for a school to experience a large increase in tests scores due to, for example, the introduction of a new curriculum or after-school program. It was also possible for unexpected answer patterns to appear without inappropriate behavior having occurred. For these reasons, a school must be in the 95th percentile on both indices to be flagged. Having to be within the 95th percentile on both indices, in this context, limits the number of schools being identified due to Type I error. In this case, a Type I error would be incorrectly identifying a school for suspicious behavior.

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<sup>3</sup> Much of unusual response pattern methodology explanation is extracted from text submitted by Data Recognition Corporation in their unusual pattern response analysis report from 2016.



## Phase II: Data Review, School Identification, and Desktop Audit: December through January

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### Data Receipt and Review

For the second year of the Georgia Milestones, GOSA received school, classroom, and student-level data from DRC beginning in mid-December, first for the EOG unusual response pattern analysis, followed by the winter EOC data in early January, and then two weeks later the spring Milestones EOC and EOG data. DRC also submitted methodology papers that summarize the data for each analysis.

Schools with flagged classrooms that have a large number of students ( $n > 50$ ) are analyzed to determine if the flag possibly exists due class size. In many cases, GOSA requests that the LEA resubmit classroom data sorted by homeroom teacher or test administrator to allow for accurate classroom assignments. Time permitting, these data are processed and reanalyzed by the testing vendor, and the new results are included in the updated school and classroom-level data files. Appendix A provides further information and explanation concerning the data in each file. These updated files are sorted by system and categorized by the number of flagged classrooms within each school and moved into the desktop audit phase.

### School Identification for Desktop Audit

Using the DRC Answer Change Analysis and the Unusual Response Pattern Analysis, and accompanying data files, GOSA flags schools for an internal desktop audit based on the following criteria:

#### *Answer Change Analysis:*

##### *EOG (Grades 3-8)*

- Five percent or more of classrooms in a school are flagged at four standard deviations or greater, OR
- One classroom is flagged at seven standard deviations or greater, OR

##### *EOC (Grades 9-12)*

- Schools with multiple classrooms flagged at five standard deviations or greater, OR
- One classroom is flagged at seven standard deviations or greater.

#### *Unusual Response Pattern Analysis:*

##### *EOG (Grades 4-8)*

- Schools where two or more testing groups had test score gains and unusual response patterns that were in the 95<sup>th</sup> percentile, OR
- Schools where one testing group had test score gains and unusual response patterns that were in the 99<sup>th</sup> percentile.

## Desktop Audit

With identified schools, GOSA conducts a desktop audit to determine a possible explanation for the flag that would remove the need for further inquiry. By narrowing the number of flagged schools, this review allows the state to focus limited monitoring and auditing resources on schools with greatest concern. In this analysis, many school-level factors, outlined in Table 1, are reviewed holistically and discussed as a team before any determinations are made. Schools are placed in one of two categories: “further inquiry needed,” or “no further inquiry needed.”

For the desktop audit, schools with more than four classrooms flagged or that have a test administrator flagged across three subject areas are placed automatically in the “further inquiry needed” category.

**TABLE 1: Desktop Audit Indicators Reviewed**

Desktop Audit Indicators Reviewed
Number of classrooms flagged in each school and whether the flagged classrooms had different test administrators.
Total answer changes and number of wrong-to-right (w-t-r) answer changes at the classroom level, including student-level data to determine whether answer changes are concentrated in a small number of students. Classrooms where more than 50% of students in a classroom have zero answer changes and/or w-t-r answer changes reduce the likelihood of systematic or widespread changes in answers from wrong to right.
The severity of the individual flagged classroom (i.e. the standard deviation value or how far from what is considered normal behavior is the class positioned). EOG flags between 4.0 and 5.0 SDs are of less concern than those over 5.0 SDs.
Percentage of total classroom answer changes changed from w-t-r.
The number of students in each classroom. (Example: Extremes in classroom populations on both ends of the distribution can skew post-calculation metrics and in turn cause flagged classrooms.)
Classroom percentile ranks of wrong-to-right answer changes by student to observe the distribution of answer changes in a classroom and compare that distribution to the state distribution. For example, comparing a classroom’s 50 <sup>th</sup> and 90 <sup>th</sup> percentile with the state 50 <sup>th</sup> and 90 <sup>th</sup> percentiles can identify whether abnormal distributions and/or outliers.
The type of school (i.e. high transient population, alternative education program, residential treatment facilities, etc.).
School demographics and groups (ELL population, gifted, magnet, students with disabilities, etc.).
Variance in performance level data from previous years.
History as a school of concern.
Prior test monitoring and/or an on-site audit by state personnel.
District personnel and/or policies currently implemented to support test security.
Review of state monitor notes and/or forms.

After the initial desktop audit, schools identified for further inquiry are reviewed a second time using the same determinants listed in Table 1. This second review is implemented as a quality assurance conformity check. A report is then developed for GOSA leadership to review before a final list of inquiry schools is determined. Schools requiring no further inquiry after the final review are removed from the list of schools requiring inquiry.

**Examples of two schools requiring no further inquiry<sup>4</sup>**

**Cooper Elementary School (Hamilton County):**

- One classroom (5<sup>th</sup> grade-Math) was flagged w-t-r with a standard deviation (SD) of 6.7 SD
- The classroom had 22 students.
- 81% of classroom answer changes were w-t-r (90 w-t-r answer changes out of 111 total answer changes).
- One student had 59 w-t-r answer changes out of 67 answer changes.
- Only 38% of classroom answer changes for other 21 students were w-t-r.
- One student was responsible for two-thirds of classroom w-t-r answer changes resulting in classroom flagged status.

**Happy Middle School (Wood County):**

- Four classrooms (8<sup>th</sup> grade-Science, English, Math, Social Studies) were flagged w-t-r at 8.79 SD, 6.44 SD, 7.77 SD, and 7.10 SD.
- The same student was the only student in each class.
- The student's w-t-r answer changes to total answer changes were 11 w-t-r of 59 answer changes (19% w-t-r), 10 w-t-r of 26 answer changes (38% w-t-r), 10 w-t-r of 39 answer changes (26% w-t-r), and 11 w-t-r of 59 answer changes (19% w-t-r). The low percentage of w-t-r answer changes suggests that systematic cheating was unlikely.

**Examples of two schools requiring further inquiry<sup>5</sup>**

**John Doe Elementary School (Nowhere County):**

- Two classrooms (5<sup>th</sup> grade-Science and Math) taught by the same teacher were flagged w-t-r at 4.75SD and 5.04SD.
- The classroom had 22 students.
- Science classroom had 55 w-t-r out of 72 total answer changes (76% of answer changes were w-t-r).
- Math classroom had 52 w-t-r out of 74 total answer changes (70% of answer changes were w-t-r)
- The school has not been flagged in prior years.

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<sup>4</sup> The actual names of schools have been replaced. The desktop audit inquiry list includes a description like the example provided for all schools requiring no further inquiry.

<sup>5</sup> The actual names of schools have been replaced. The desktop audit inquiry list includes a description like the example provided for all schools requiring no further inquiry.

**Jane Doe Elementary School (Homestead County):**

- Four classrooms (4th<sup>th</sup> grade-three Math and one English) were flagged w-t-r at 6.80SD, 5.00SD, 4.76SD, and 4.63SD.
- All classrooms had approximately 22 students.
- Math 1 had 59 w-t-r out of 78 total answer changes (76% of answer changes were w-t-r).
- Math 2 had 49 w-t-r out of 61 total answer changes (80% of answer changes were w-t-r).
- Math 3 had 51 w-t-r out of 78 total answer changes (65% of answer changes were w-t-r).
- English had 50 w-t-r out of 85 total answer changes (59% of answer changes were w-t-r).
- The school was flagged in 2014 and has not been monitored.

## **Phase III: SBOE Recommendations and Interventions: January through June**

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### **Recommendations to SBOE**

Once the list of schools requiring further inquiry is finalized, GOSA makes recommendations to the SBOE for appropriate monitoring, inquiry, and interventions in schools requiring further inquiry during the spring administration of the Georgia Milestones. At a minimum, these steps include the following for all remaining schools:

- Submission of an inquiry form to GOSA describing the reasoning for the classrooms requiring further inquiry and steps taken to reduce the likelihood of future classrooms requiring further inquiry (Form included as Appendix II),
- Rotation of teachers during test administration so that teachers are not administering test to students they are currently teaching, and
- The possibility of a visit from a state monitor during spring administration of the Georgia Milestones for one or more days.

GOSA reserves the right to request full investigations and on-site audits as deemed necessary. In addition, GOSA may select random schools to send an on-site monitor or conduct an on-site audit.

The report to the SBOE includes a summary report and presentation for the EOG and EOC that identifies schools with classrooms requiring further inquiry, schools to be monitored during testing, schools to be required to submit inquiry forms, and schools identified for on-site audits. Prior to sharing with the SBOE, GOSA provides the results to the GaDOE Assessment and Policy divisions. If requested, GOSA briefs the state school superintendent, who makes the determination on whether GOSA will present to the Policy Committee or to the full SBOE. The SBOE votes on these recommendations.

Prior to the SBOE meeting, GOSA also emails high-level information to district superintendents who have identified schools to notify them that further directions will come following the SBOE meeting.

### **Inquiry Forms, Monitoring, and On-Site Audits**

Once the SBOE approves GOSA's recommendations, GOSA releases relevant data to LEAs regarding schools containing classrooms requiring further inquiry. Classroom and student data are uploaded to a secure FTP site for LEAs to retrieve. Separate emails are sent to LEAs with instructions regarding how to complete inquiry forms and other required steps to ensure test security during the upcoming test administration. Three components of the system investigation phase are described below:

**School Inquiry Form:** Each LEA is required to submit an online school inquiry form for every school requiring further inquiry. Appendix I includes the template for the communications with LEAs concerning the inquiry form, and Appendix II includes the questions included in the inquiry form. GOSA provides in person and/or online training for school and district test coordinators to outline the investigation process and the reports they are required to submit. In addition, teleconferences with schools requiring further inquiry are routinely scheduled to answer questions. Once submitted, GOSA reviews the information provided to determine whether the cause for the school requiring further inquiry is clearly explained and if no further inquiry is needed. If a form lacks evidence of a thorough and rigorous analysis, GOSA may request for additional information and/or a full investigation from the LEA.

A template of the School Inquiry form can be found in the Appendix II, and additional information can be found on the auditing page of the GOSA website. A sample GOSA letter response to LEAs is included in Appendix III.

**Test Monitoring:** GOSA conducts random, unannounced monitoring visits in schools requiring further inquiry and schools requiring no inquiry during test administrations to oversee test administration practices. Test monitors are state employees of GOSA. Test monitors are trained in person or via webinar each year to ensure consistency and thoroughness when making monitoring visits.

**On-Site Audits:** GOSA reserves the right to conduct an on-site audit of schools requiring further inquiry for wrong-to-right answer changes, or at random, to ensure compliance with test security best practices. Audits usually occur before spring testing, but may also carry into the following school year depending upon evidence sought to clear the school(s) in question. Schools identified as a school requiring further inquiry for multiple years may be given priority for an on-site audit. An on-site audit examines aspects of the test administration, including test administrator training, access to secure test materials, and the variance in answer change data. Once an audit has been conducted, an audit report is developed and delivered to the system superintendent. Appendix IV provides the template for communication with LEAs concerning on-site audits, and Appendix V includes the template for audit reports

## **Audit Completion**

**Receive and review system investigation reports:** Systems return online inquiry forms and full investigation reports to GOSA from late March into early May, depending upon the number of schools flagged within the system. Reviews are done on a rolling basis by the auditing team as reports come in. GOSA communicates with the LEA throughout the process until the State's concerns have been satisfied.

**Close Investigations/Audits:** When all classrooms requiring further inquiry in an LEA no longer require further inquiry, GOSA sends a letter to notify the superintendent. For classrooms that still require further inquiry after a full investigation, a referral to the Georgia Professional Standards Commission is made either by the LEA or GOSA. The Georgia Professional Standards Commission (GaPSC) is statutorily responsible for regulating professional employees in Georgia's public schools by investigating allegations of educator misconduct and providing recommendations for disciplinary actions.

## Appendix I: Sample First Contact Inquiry Email

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Good afternoon, Superintendent \_\_\_\_\_:

The Governor's Office of Student Achievement (GOSA) has completed its annual assessment audit of the 201 Spring Milestones EOG and EOC tests and identified schools requiring further inquiry. As in previous years, GOSA partnered with the state's testing vendor to conduct a comprehensive examination of student answer changes from wrong to right on all student tests for grades 3 through 12. In addition, an unusual response pattern analysis has been introduced this year which identifies unusual gains and response patterns on student tests for EOG English and Mathematics. Since school(s) in your district are on the list of schools requiring further inquiry, we would like to share the embargoed results with you prior to presenting this information to the State Board of Education's Policy Committee on \_\_\_\_\_.

GOSA has identified the following schools with classrooms requiring further inquiry in your district:

<<Schools>>

(Broken out by method of identification)

As the next step in responding to our inquiry, the LEA Assessment Director will be required to fill out the ten-question form linked below to explain the LEA's Milestones testing process and the reason(s) for the variance(s) in the data for the classroom(s) requiring further inquiry (link below).

[Georgia Milestones Assessment School Inquiry Form](#)

Completed forms for each school must be submitted by <<Date>> at 5:00 PM. Once received, GOSA will review this information in conjunction with relevant state-level classroom and student data to determine whether the inquiry can be closed or if further information is required. If further inquiry is necessary, it may include a document/records request, full investigation, or an on-site audit. GOSA will notify the LEA superintendent and the Assessment Director by email of inquiry closure or next steps within 30 days of the deadline.

As in prior years, GOSA will provide you with relevant classroom- and student-level data next week through an online FTP site to be used in your district's inquiry into the flagged classrooms listed above. To facilitate this transfer, please send an email by <<Date>> to Dave Greenstein at [dgreenstein@georgia.gov](mailto:dgreenstein@georgia.gov) with the appropriate staff member name and email address to gain access to the FTP site. Dave will set up the account and provide directions on how to download classroom and student-level data files from a secure FTP server.

If this is your first time conducting an investigation, please expect a call from David Greenstein, Program Manager, Academic Auditing, to walk you or the System Test Coordinator through the Excel file. If you are familiar with the data files and simply need a refresher, please access the online resources link provided: <http://gosa.georgia.gov/academic-auditing>

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Please remember that the information contained in this email is embargoed until presented to the State Board of Education Policy Committee meeting on <<Date>>.

Please let us know if you have any questions in regards to this analysis.

Dave Greenstein  
Program Manager, Academic Auditing  
404-844-8534  
[dgreenstein@gosa.ga.gov](mailto:dgreenstein@gosa.ga.gov)

Thank you in advance for your cooperation in this matter.

Sincerely,

Martha Ann Todd  
Executive Director  
Governor's Office of Student Achievement



## **Appendix II: Georgia Milestones Assessment School Inquiry Form**

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*To view the Georgia Milestones Assessment School Inquiry Form please click on the following link:*

[Georgia Milestones Assessment School Inquiry Form](#)

## Appendix III: Sample Inquiry Form Response to LEA

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<<DATE>>

Dear Superintendent <<Name>>:

Thank you for the work done by your district to determine why some classrooms' wrong-to-right answer change data and/or some student response patterns varied significantly from the rest of the state's testing population on the Spring 2017 Milestones EOG and/or EOC.

<<School Name>> was flagged for further inquiry because additional information was needed by the State for the following classrooms:

Grade	Subject	Teacher Name	Standard Deviation
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The Governor's Office of Student Achievement (GOSA) has reviewed your answer change analysis inquiry responses. The following information summarizes the explanation you provided in the inquiry as well as GOSA's response.

*Reason(s) for School Being Identified for Further Inquiry*

*Reason(s) Reported for Classrooms Requiring Further Inquiry*

*School/LEA Procedures in Place and/or New Procedures Developed to Address Concerns*

*GOSA Response*

Regards,

Martha Ann Todd  
Executive Director  
Governor's Office of Student Achievement

## Appendix IV: On-Site Audit Notification Email Template

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Dear Superintendent <<Name>>,

The Governor's Office of Student Achievement will be conducting an on-site answer change analysis audit at <<Insert School Name>> on <<Date>>. This audit was deemed necessary to gain further information about testing procedures at <<School Name>> during 2017 Milestones testing beyond what was provided in the inquiry form that your Director of Assessments provided on <<Insert Date>>. We will begin the visit at the district central office to speak with the district's Director of Assessments, before moving on to the school where we will speak with appropriate personnel regarding 2017 Milestones testing.

The Governor's Office of Student Achievement would like to thank you and your personnel in advance for your cooperation in this matter.

Sincerely,

Martha Ann Todd  
Executive Director  
Governor's Office of Student Achievement

## Appendix V: Sample On-Site GOSA Response Letter and Follow-Up Templates

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<<Date>>

Dear Superintendent,

The Governor's Office of Student Achievement has completed its review of the on-site audit conducted at <School Name> on <<Date>>. Along with this letter, please find our formal report of GOSA's findings and our recommendations for improving data collections and reporting within the <LEA Name>.

In conformity with provisions of *Government Auditing Standards*, you are responsible for responding to this letter and taking corrective action on the findings and recommendations contained within GOSA's official report. We are requesting that you prepare a corrective action plan addressing each recommendation included in the GOSA audit report. This corrective action plan will be included the final GOSA audit report.

Attachment A includes a template for your response letter to the findings and recommendations in the letter. Please use the template to respond on your own letterhead. Your response will be included in the final audit report. Attachment B includes instructions for preparing your corrective action plan for each recommendation. Please submit your response letter and corrective action plan to Dave Greenstein at [dgreenstein@georgia.gov](mailto:dgreenstein@georgia.gov) by no later than <<Date>>. If your response is not received by that time, the report may be published on GOSA's website with a note that the District did not respond to the audit in by the required deadline.

The Governor's Office of Student Achievement would like to thank you and your personnel for your cooperation during this process. Please do not hesitate to reach out to us with any questions as you complete this next step.

Regards,

Martha Ann Todd  
Executive Director  
Governor's Office of Student Achievement

**ATTACHMENT A: District Response Letter Template**

*Please use official district letterhead.*

Governor's Office of Student Achievement  
Academic Auditing Program  
205 Jesse Hill Jr. Drive, SE  
952 Twin Towers East  
Atlanta, GA 30334

RE: <School Name> Georgia Milestones On-Site Audit

Dear Executive Director Todd:

In connection with your on-site audit conducted at <School Name> on <<Date>> and the subsequent draft audit report received on <<Date>>, we conclude the following in regard to the Governor's Office of Student Achievement's Georgia Milestones audit (select only one option):

- ☐ We have reviewed a draft copy of GOSA's audit findings report of <School Name>, and concur that the findings and conclusions are fairly presented. We are responsible for the findings and conclusions contained within the report and for establishing and maintaining adequate records and effective internal control over data collections and reporting, providing appropriate training and the hiring of qualified staff, and the safeguarding of accurate records.
- ☐ We have reviewed a draft copy of GOSA's audit findings report of <School Name> for the on-site audit conducted on <<Date>> and believe the findings and conclusions contained within GOSA's audit report are not fairly presented for the following reasons:

*Please be specific and attach appropriate documentation:*

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Along with this letter, we have attached a Corrective Action Plan to address the recommendations stated in the audit report.

Respectfully,

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Superintendent  
<LEA Name>

## ATTACHMENT B: Corrective Action Plan Template

Your Corrective Action Plan response will be published in the final GOSA audit report. Please take great care in preparing your corrective action plan. Your response should clearly describe measures that have been taken or will be taken to effectively resolve each recommendation listed in the GOSA draft report. The following instructions and guidelines can assist you in the preparation of your plan. Each response will be reviewed by our office for adequacy. Should your response fail to comply with these guidelines, you will be contacted to discuss appropriate revisions.

### REQUIRED ELEMENTS OF A RESPONSE

<b>Reference to Recommendation Number</b>	Each response should be referenced to the Recommendation Number listed in the GOSA draft audit report.
<b>Statement of Agreement or Disagreement with Recommendation</b>	Management should provide a statement of agreement or disagreement with the findings and recommendations. If you do not agree with a finding, specific information should be referenced to support your position. <sup>1</sup>
<b>Planned Corrective Action to Address Recommendation</b>	The plan should provide pertinent comments on the detailed action taken or planned to correct the deficiencies in the audit findings, or a statement, as appropriate, which describes the reason(s) that corrective action is unnecessary. <u>For planned actions, management should provide projected dates for completion of major tasks.</u>
<b>Contact Person</b>	Management responsible for completing the proposed actions should be identified. Please indicate their name, title, telephone number, and e-mail address.
<sup>1</sup> If the School District has documents, correspondence or other supporting documents on file that are pertinent to the School District's response to its findings, please make reference to such items in the response <u>but do not include such documents with the corrective action plan.</u>	

Examples responses that meet the requirements above are provided on the following page.

Upon completion, please provide the management's corrective action plan, along with the district response letter, to:

Dave Greenstein  
Program Manager, Academic Auditing  
Governor's Office of Student Achievement  
205 Jesse Hill Jr. Drive, SE  
952 Twin Towers East  
Atlanta, GA 30334  
[dgreenstein@gosa.ga.gov](mailto:dgreenstein@gosa.ga.gov)  
404-844-8534

If you have any questions regarding preparation of the corrective action plan and/or submission to this office, you may contact the person listed above.



### **Corrective Action Plan Response Examples**

#### **Recommendation Number 1: Training should be provided to all pertinent staff members to ensure knowledge of revisions in Department of Education football storage practices.**

We concur with this finding. The District will ensure that all appropriate staff members attend all pertinent Department of Education web trainings and a minimum of one in-person training event each year. The District anticipates that this training will occur annually between August 1<sup>st</sup> and August 15<sup>th</sup>.

Contact Person: Sherman Jones, Tundra County Superintendent of Schools

Phone: (395) 444-1004

Email: SJones@ Tundra.k12.ga.us

#### **Recommendation Number 2: A football storage specialist should be identified to ensure footballs are appropriately stored and accounted for after daily usage.**

We concur with this finding. The football coach has identified the trainer, Frank Smith, to serve as the football storage specialist to ensure footballs are appropriately stored and accounted for after daily usage. He started in this role on October 15 and has been daily monitoring football storage since that date.

Contact Person: Sherman Jones, Tundra County Superintendent of Schools

Phone: (395) 444-1004

Email: SJones@ Tundra.k12.ga.us

## Appendix VI: Sample On-Site Audit Report Format

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Conducted by:

Dave Greenstein, Program Manager, Academic Auditing  
Governor's Office of Student Achievement

### *Background:*

The Governor's Office of Student Achievement (GOSA) conducts academic audits and investigations to maximize the integrity of student achievement data and to ensure the LEAs implement Georgia Department of Education (GaDOE) assessment policies and procedures with fidelity, so that achievement data can be utilized in making critical decisions and reporting of student outcomes.

Through a Georgia Milestones on-site audit, GOSA reviews testing data and information provided by the state's testing vendor and LEAs to understand why classrooms required further inquiry for wrong-to-right answer changes. This process helps to ensure that LEAs and schools are following all GaDOE and LEA policies and procedures with fidelity.

### *Authority:*

GOSA conducts Georgia Milestones audits in cooperation with the Georgia Department of Education (GaDOE), pursuant to the Official Code of Georgia Annotated as set forth in Section 20-14-26 (a)(2):

*To audit and inspect or cause to be audited or inspected for the purpose of verification, research, analysis, reporting, or for other purposes related to the performance of its powers and duties as provided in this article and for the purposes of auditing pre-kindergarten, elementary, middle grades, and secondary education, postsecondary education, and education work force programs and schools, local school systems, institutes, colleges, universities, regional education service agencies, and other public education programs and entities as defined by the council.*

### *Audit Objective and Methodology:*

GOSA identified classrooms requiring further inquiry for w-t-r answer changes at <<School Name>> for the <<School Year>>. <<School Name>> had the following classrooms requiring further inquiry for w-t-r answer changes:

School Name	Classroom	Standard Deviation	<u>Flagged for Unusual Response?</u>
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GOSA initially requested information regarding the classroom(s) requiring further inquiry and testing procedures through an online inquiry form. <LEA Name> submitted this form on <<Date>>.

After review of the form, GOSA determined it was necessary to make a site visit to <<School Name>> in <<LEA Name>> to gain more information through an on-site audit. The intent of this audit is to determine the reason for the classroom(s) requiring further inquiry and to gain insight into how testing is conducted at the school.



On <<Insert Date>>, GOSA visited <<School Name>> to collect information via interviews of administrators, teachers, and students at the district and school level. In addition, documents were reviewed at the school level regarding the test administration in question. GOSA has reviewed the information collected during this audit in conjunction with the LEA's inquiry form. It has the following findings:

*Findings:*

- Bulleted points will lay out the factual findings of the audit.
- All findings will be factual in nature.

**Conclusion and Recommendations:**

Based upon a review of the personnel interviews, student records, and documentation, the reasons for the outlier results appear to have occurred because of a combination of personnel changes, events, and omissions.

- Bulleted points will lay out the conclusions of the on-site audit.
- All conclusions will be based upon actual evidence.

For future Georgia Milestones test administrations, the <LEA Name> should take the following steps:

1. Recommendations for remediation will be listed by number here.

As outlined in the audit letter, GOSA requested that <LEA Name> provide an official response to the audit report and provide a corrective action plan for each of the seven recommendations outlined above. This response has been included as Attachment A to this report.

GOSA will follow-up with the superintendent six months and twelve months after receipt of this report in order to verify the implementation status of these recommendations for <School Name> and the school district at large. Failure to implement the corrective action plan, or a continuation/increase of flagged classrooms, may lead to a future investigation. This audit will remain open until these recommendations are effectively implemented.

*GOSA Point of Contact:*

David Greenstein  
Program Manager, Academic Auditing  
404-844-8534  
[dgreenstein@gosa.ga.gov](mailto:dgreenstein@gosa.ga.gov)