# Montana
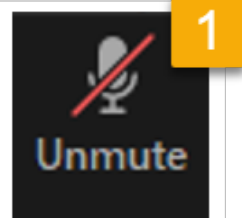## Office of Public Instruction

# Ensuring Test Security and Student Privacy

**MontCAS Webinar Series**
**November 8, 2023**
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**Assessment Unit**
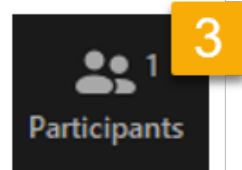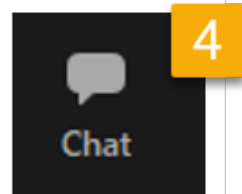**Teaching and Learning Department**

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# Zoom Basics

Mute your mic when it is not in use.

Share your video.

Clearly name yourself as a participant.

Use the chat and/or the Google Q&A function.

# Objectives

- Test security measures and guidelines.
- FERPA and Student Privacy
  - What is PII and how to communicate PII with the OPI
- Testing incident levels and reporting
- Walking through a testing incident
- Setting up and using the Secure File Transfer service (live demonstration)
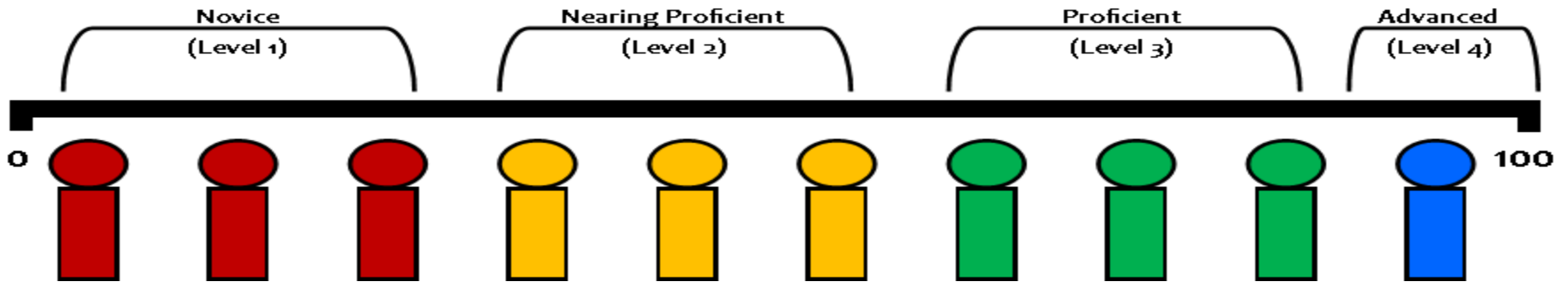
# What is Test Security?

Definition: the continuous maintenance and control of all test material within a testing program by only those individuals who are qualified and/or designated to have access to them.

Goal: to protect content of a test from unauthorized release or use, to protect the integrity of the test scores so they are valid for their intended use, and to ensure results are accurate and meaningful.

★   Every Student Succeeds Act (or ESSA) in Section 1111

★   Administrative Rules for Montana (or ARM) Chapter 55 and 56

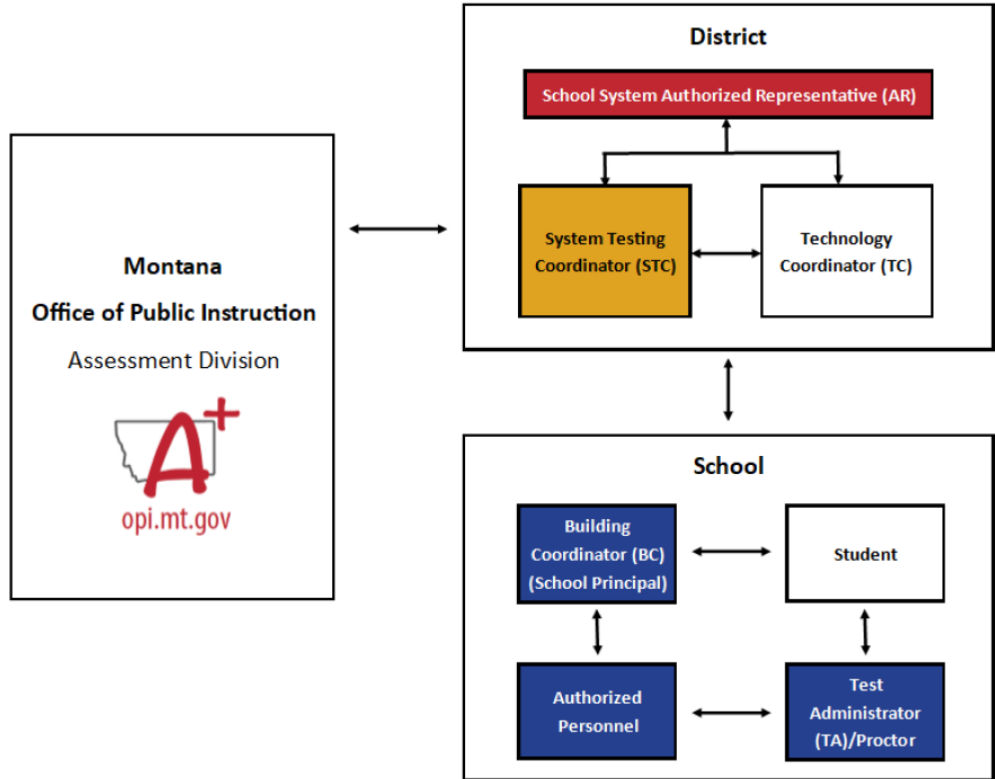★   Montana Code Annotated (or MCA) Title 20 Chapter 7

# Why Is Test Security Important?

The actions you take to ensure that test content and student responses are protected so that test scores are valid and reliable.

# Where Does Test Security Happen?

The state, school districts, school personnel and students are critical partners in ensuring test security.

# MontCAS Test Security Manual

### District Testing Plans
- Test Administration Plan
- Test Accessibility Plan
- Test Security Plan
- Data Use Plan
- Test Training Plan

### Monitoring
- Local Monitoring
- State Initiated Monitoring

### Testing Incidents
- Prevention
- Detection
- Resolution



**MontCAS** Montana Comprehensive Assessment System
opi.mt.gov **Montana Office of Public Instruction**

**MontCAS Test Security Manual**

Policies and Procedures for Data Integrity and Test Security within the Montana Comprehensive Assessment System (MontCAS) Program

**Reviewed August 2023**

All accredited schools must annually administer the state assessments approved by the Montana Board of Public Education and follow the test administration protocols according to the standardized procedures published by the Montana Office of Public Instruction (OPI). These policies and procedures provide documentation of the test security and protection measures used by the OPI to safeguard its state assessments under the obligations of Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). The "MontCAS Test Security Manual" guidance describes the policies and procedures required for test security in the state of Montana. These requirements fall under the authority of both state and federal laws and regulations which are defined further throughout this manual.

# Protecting PII

**MontCAS**
**Mont**ana
**C**omprehensive
**A**ssessment
**S**ystem

- ★ Protect visibility of reports and computer monitors
- ★ Lock or shutdown workstations
- ★ Never share usernames/passwords
- ★ Store electronic data in a password protected format
- ★ Shred any paper reports and destroy electronic files

- ★ Protect physical data from unauthorized persons
- ★ Change data to guarantee anonymity
- ★ Stamp or otherwise mark all materials containing PII
- ★ Do not send PII via e-mail or fax
- ★ Do not leave PII on a voicemail

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System

# Protecting PII

**Who is a "school official" under FERPA?**
- ★ Teachers,
- ★ Principals,
- ★ Presidents/Chancellors,
- ★ Board Members/Trustees,
- ★ Registrars, counselors, or admissions officers,
- ★ School/District attorneys and accountants,
- ★ Human resource professionals,
- ★ Information Systems Specialists,
- ★ Support/Clerical staff

# Sharing PII

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**A**ssessment
**S**ystem

BEFORE YOU SHARE THAT STUDENT RECORD...

STOP!  THINK!

FERPA!

REMEMBER IT'S UP TO YOU TO KEEP STUDENT DATA SAFE!

For more information, visit the U.S. Department of Education's
**Student Privacy Policy Office**
https://studentprivacy.ed.gov

Voicemail
Email

# Protecting PII

Our school/district shares this data via email, why can't I email it to you?
- ★ Does your school/district use an encryption service?
- ★ Montana is a local control state.
    - ○ What is your school's/district's policy around sharing student data?
- ★ Does your school/district follow FERPA as its guiding policy around data sharing?

"A school may disclose "directory information" to third parties without consent if it has given public notice of the types of information which it has designated as "directory information," the parent's or eligible student's right to restrict the disclosure of such information, and the period of time within which a parent or eligible student has to notify the school in writing that he or she does not want any or all of those types of information designated as "directory information.""

# Protecting PII

A school may disclose "directory information" to third parties without consent

**if** it has given public notice of the types of information which it has designated as "directory information,"

**if** the parent's or eligible student's right to restrict the disclosure of such information, and

**if** the period of time within which a parent or eligible student has to notify the school in writing that he or she does not want any or all of those types of information designated as "directory information."

# Testing Incident

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**Testing Incident/Testing Irregularity: an incident, activity, or behavior that violates test security, which as a result, may affect the integrity, the confidentiality, and/or the validity of the test results.**

**Level 1: Low impact, low risk.** Anything unusual that happens during testing. Could be considered 'routine' event, but standards of test administration are not observed.

★ Student leaves the testing room without authorization.
★ Student making distracting gestures/sounds.
★ Fire drill or school-wide power outage occurs during testing.
★ A non-certified educator administers the assessment.
★ PII Disclosure.

# Testing Incident

**Level 2: Standards of test administration are not observed.** The difference between Levels 1 and 2 are usually defined in perception of the degree, intent, and/or effect of the misconduct. It typically does not have statewide or nationwide implications, but may invalidate test scores for one or more students.

★ Test Administrator leaves instructional related materials on the wall or desks.
★ Test Administrator allows inappropriate designated supports and/or accommodations.
★ Student possesses or uses a cell phone during testing.
★ A student accesses the internet during testing.

# Testing Incident

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**Level 3: the act of breaking or failing to observe the standards of test administration.**
The most serious level includes a narrow set of activities.  It may compromise the integrity of an assessment, typically by exposing secure test materials. It can affect all students participating in the assessment statewide and/or nationwide.

★ Test Administrator modifies a student's response.
★ An adult or student posts item(s) or test materials on social media/website.
★ The live student interface is used for practice.
★ Test Coordinator or Test Administrator giving their own username/password to another person.

# Test Incident Reporting

**TA** — Educator (or Test Administrator) reports incident to Building Coordinator.

**BC** — Building Coordinator reports incident to System Test Coordinator.

**STC** — System Test Coordinator reports incident to OPI.

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OFFICE OF PUBLIC INSTRUCTION
ELSIE ARNTZEN, STATE SUPERINTENDENT
OPI.MT.GOV

**Date of Incident:**

**Has OPI been contacted regarding this incident?**  ○ Yes  ○ No

**Grade(s):**
☐ KH ☐ KF ☐ 1 ☐ 2 ☐ 3
☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8
☐ 9 ☐ 10 ☐ 11 ☐ 12

**Please do not put any information that could be used to identify a student into any of the text boxes.**

**Describe the Incident:**

- **What was the incident?**
- **What exactly happened?**
- **When did it happen?**
- **Where did it take place?**

**Describe the number of students involved and how they may have been impacted:**

- **Who was involved?**
- **How many students were involved?**
- **What did they experience?**

**Describe the number of test administrators (or proctors) involved and how they may have been impacted:**

- **What training, account permissions, or avoidable steps were taken prior to the event?**

**Enter student State ID:**

If no State ID is entered because no students are affected, please give an explanation below.

# What information should I include in my report of a testing incident?

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1. How was it reported?
2. Does the incident have the potential to impact performance?
3. Is it a case of cheating?
4. Is it a case of negligence and/or system breach?
5. Does it impact more than one student?
6. Was it deliberate or clear there was some intention behind the behavior to impact performance?

OPI makes a determination:
★ Follow up with district with resolution guidance.
★ Elevate case to the OPI Leadership Team.
  ○ Recommend to Licensure and/or The Board of Public Education.

# Testing Incident Resolution
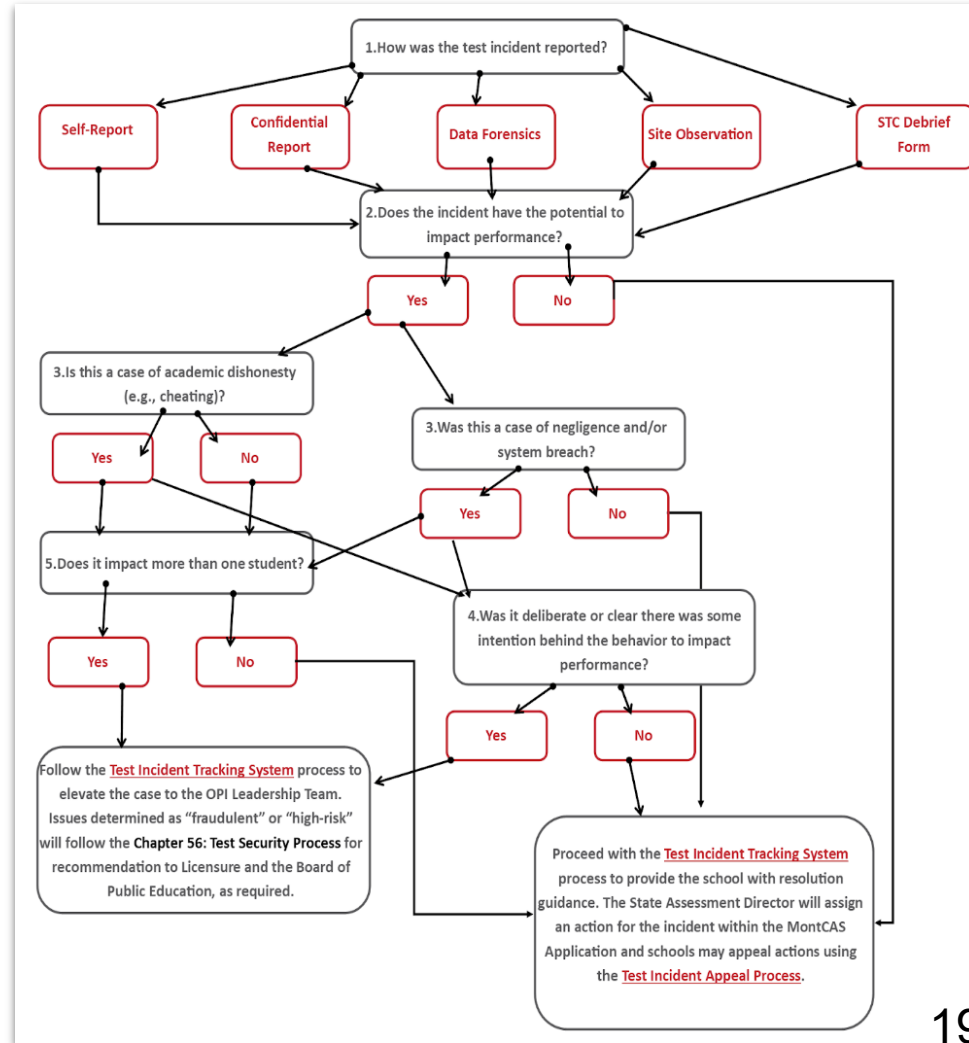
## Testing Incident Responses via MontCAS Application

**No Action Taken**                    **Action Taken**

- ★ Thank you for reporting.
- ★ More training and attention be given to test security.
- ★ Results may not accurately reflect student ability.
  - ○ Incorrect supports/accommodations
  - ○ Administration error
    - ■ Reminder to share with stakeholders
- ★ PII disclosure reminder.
- ★ Data sharing reminder.
- ★ Notice of further communication.

# Testing Incident Resolution

## Testing Incident Responses via MontCAS Application

### Action Taken

★ Invalidation of student(s) scores.
  ○ Student received unfair advantage
  ○ Test Administrator errors
    ■ Reminder to share with stakeholders.
★ School placed on future monitoring list.
★ Prohibit specific personnel from administering a state assessment.
★ Require a re-training plan before future state assessment administrations.
★ Referral of district to OPI Student Support Unit.
  ○ Accommodations/supports errors.
  ○ Not following the student's educational plan.
★ Reporting action to the Montana Board of Public Education.

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# Testing Incident Resolution

## Testing Incident Responses via MontCAS Application

### Other Responses

★ Missed Deadline
   ○ Incomplete test security assurances (STC).
   ○ Failure to return secure materials to vendor.
★ Not a Testing Incident
   ○ Smarter Balanced, Montana Science, Alternate Montana Science
      ■ Completed within the Montana Testing Portal

# Testing Incident Example

**Grade 5 student identified as an alternate student in his IEP.**

**Student completed the MSAA tests. Student has not started the AMSA.**

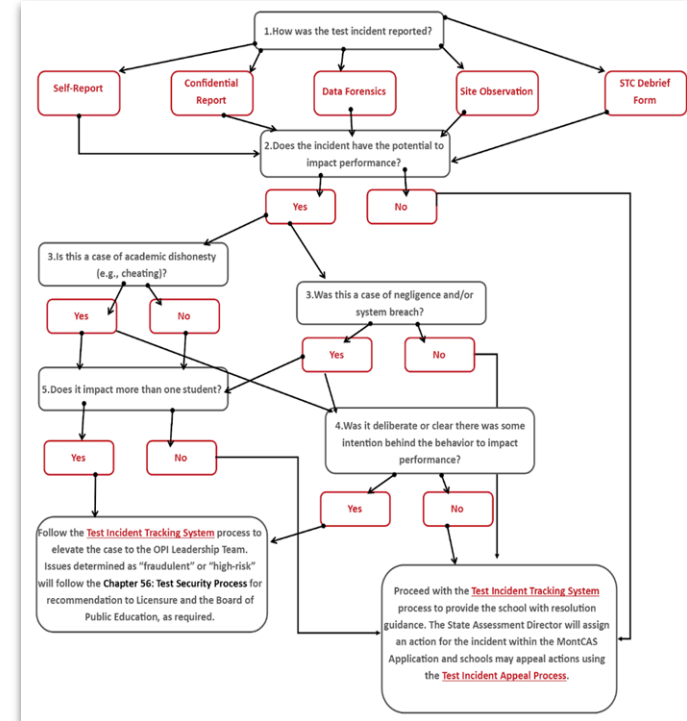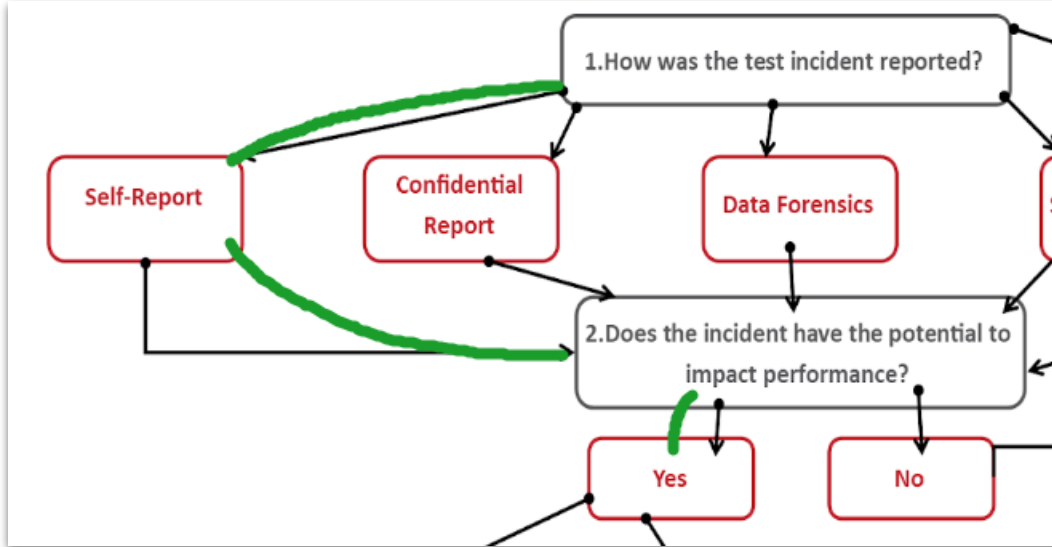**Student completed the Montana Science Assessment.**

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# Testing Incident Example

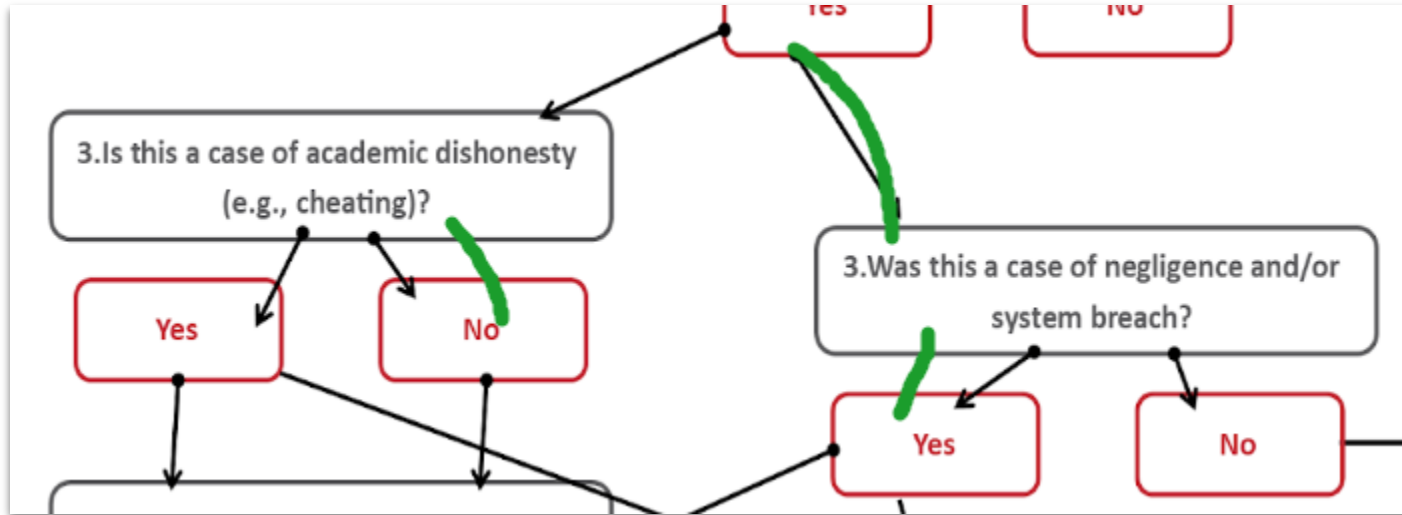Test settings had not been entered in the Montana Testing Portal.

Test Administrator became frustrated, so gave the student the MSA.

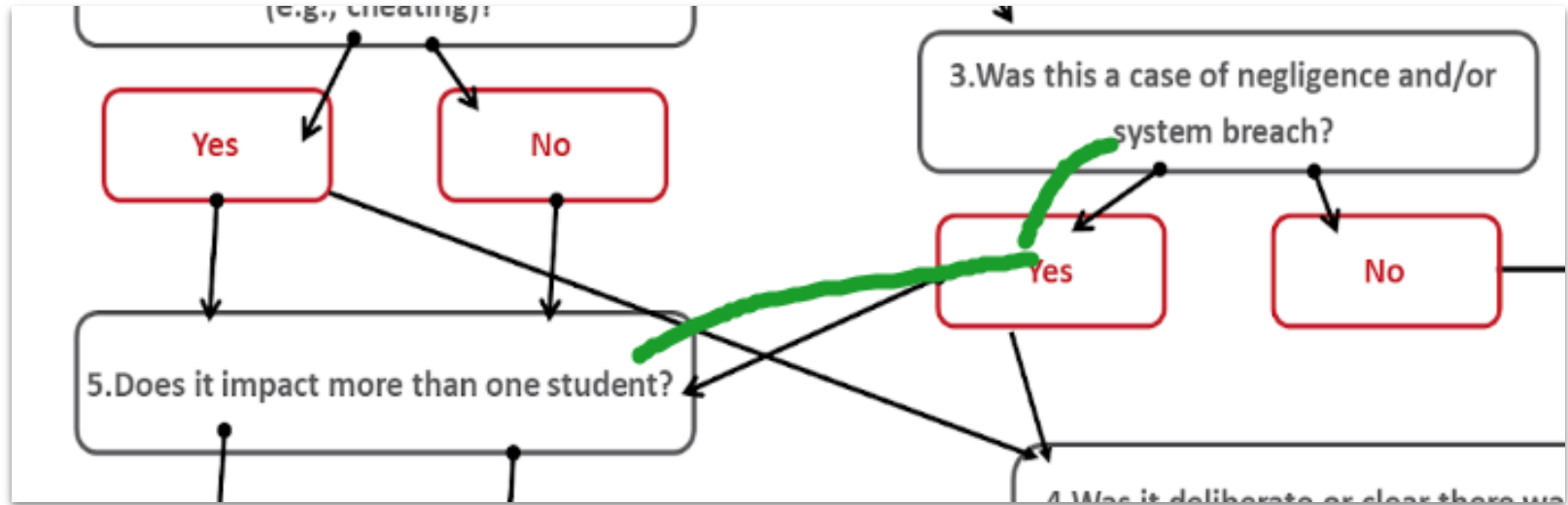STC noted that no one notified him that the test settings were not set properly.
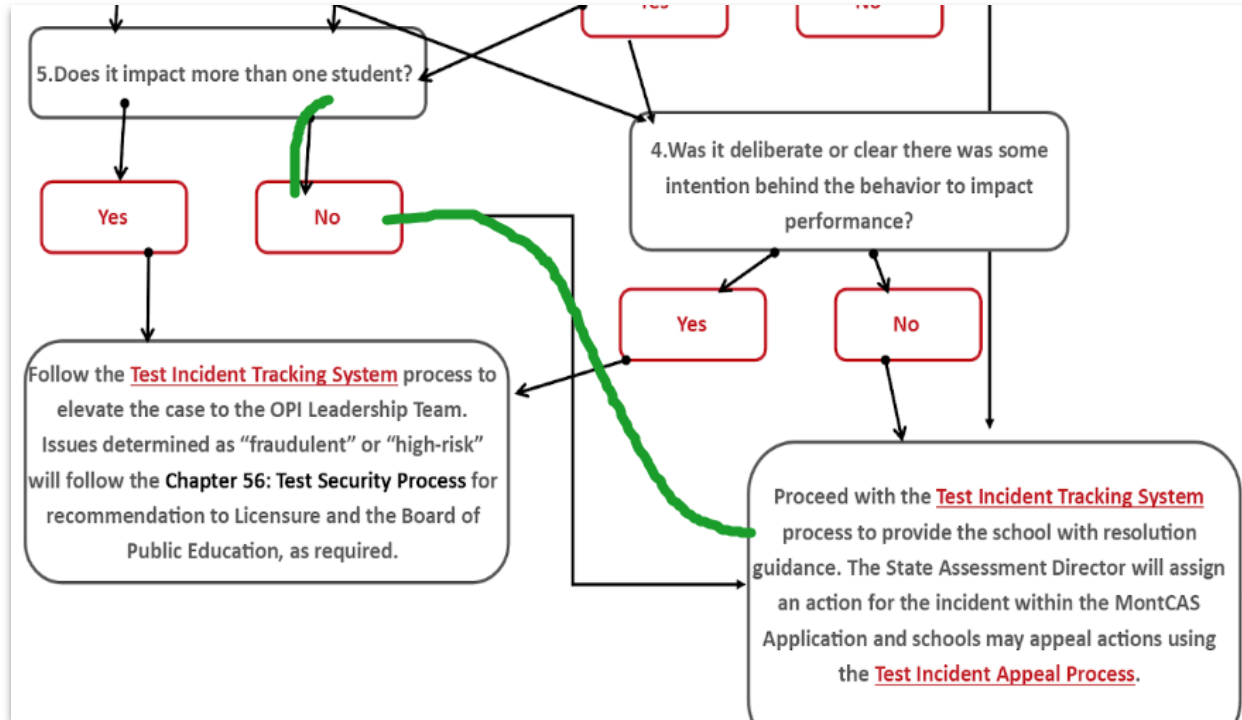
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# Testing Incident Example

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**S**ystem

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# Testing Incident Example

**MontCAS**
**Mont**ana
**C**omprehensive
**A**ssessment
**S**ystem

# Testing Incident Example

# Testing Incident Example

**OPI found no historical evidence of a similar incident.**

**Action Taken: Invalidation of student score, share with stakeholders.**

**Student counted as a non-participant and was not given the opportunity to take the science assessment.**

# Testing Incident Example

OPI found historical incidents involving misused accommodations.

Action Taken: referral to Student Services, or placement on monitoring list.

OPI follow up on any response sent to districts the following year.

# Secure File Transfer System

Montana File Transfer Service
  ★ ePass
  ★ OKTA
  ★ Secure File Transfer Service

https://transfer.mt.gov/Home/Login

# Questions

**OPI Assessment Helpdesk**
1.844.867.2569
OPIAssessmentHelpDesk@mt.gov