



Dave Yost • Auditor of State

HORIZON SCIENCE AND NOBLE ACADEMIES

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INDEPENDENT AUDITORS' REPORT

Horizon Science and Noble Academies
Board's of Education

We conducted a special audit of the Horizon Science and Noble Academies (the Schools) operated by Concept Schools, Inc. by performing the procedures enumerated in the attached Supplement to the Special Audit Report for the period July 1, 2013 through June 30, 2014 solely to:

- Identify and evaluate the Schools' policies, procedures, and key controls for administering State-mandated annual assessments in accordance with significant relevant Ohio Revised Code and Ohio Administrative Code provisions governing the on-site administration of the assessments.

This engagement was conducted in accordance with the Quality Standards for Inspection and Evaluation established by the Council of the Inspectors General on Integrity and Efficiency (January 2012). The procedures and associated findings are detailed in the attached Supplement to the Special Audit Report. A summary of our procedures and significant results is as follows:

1. Through inquiry, interview, and examination of available records, we obtained an understanding of the Schools' policies, procedures, and key controls for administering State-mandated annual assessments.

Significant Results: While State law requires several annual assessments, the Ohio Achievement Assessments (OAA) and Ohio Graduation Tests (OGT) are two which significantly drive accountability for student achievement of academic content standards. This special audit focused on these two assessments in response to an allegation of fraud and based on their weight in determining state standards.

Concept Schools, Inc. operated 19 schools in Ohio during the period. Generally, management articulated to auditors reasonably detailed procedures for many of the aspects of administering the OAA and OGT. However, in all but two instances the Schools did not reduce those procedures to writing or include them in a comprehensive set of written procedures to administer OAA and OGT assessments. For some of the areas of assessment administration, state statutes and Ohio Department of Education rules require written procedures containing certain content. The lack of such written procedures containing the required content led to the noncompliance identified in this report. We reported a management comment regarding the lack of written procedures.

2. We examined governing board adopted policies and procedures and other relevant documentation to assess compliance with significant statutes and rules governing the administration of State-mandated annual assessments.

Significant Results: Based on responses and documentation provided we noted a lack of clear understanding of the specific requirements related to ethical assessment practices and written security and investigation procedures. Additionally we noted the Schools generally were unable to demonstrate staff administering the assessments agreed to follow the Schools' policies and procedures. We reported three noncompliance citations related to these matters.

On August 18, 2015, we held an exit conference with representatives of the Schools and Concept Schools. The Schools provided additional documentation based on exit conference discussions. The documentation was examined and any necessary changes to the report were made. The Schools have chosen to respond to our report. A response was received on October 5, 2015. The response was evaluated and changes to the report were made as warranted.



Dave Yost
Auditor of State

December 24, 2014

Supplement to the Special Audit Report

Background

The administration and grading of Ohio's achievement and graduation tests are generally governed by Ohio Revised Code Sections 3301.0710 and 3301.0711. These statutes require the state board of education to adopt rules establishing a statewide program to assess student achievement. Those rules are adopted generally in Ohio Administrative Code Sections 3301-07-01 and 3301-13. Additionally, the Ohio Department of Education has developed and made available to schools various manuals that specifically direct school personnel on the way to administer the assessments. Those manuals and guidance include specific district and building coordinators' manuals and the Ohio Statewide Assessment Program Rule Book.

While State law requires several annual assessments, the Ohio Achievement Assessments (OAA) and Ohio Graduation Tests (OGT) are two which significantly drive accountability for student achievement of academic content standards. Schools administer OAA reading and mathematics tests annually in grades 3-8, and OAA science tests in grades 5 and 8. Schools administer the OAA in the spring during the school year. Beginning with the class of 2007, students are required to pass all five subject areas of the OGT as well as meet all local and state curriculum requirements to receive a high school diploma. The OGT subject areas include reading, mathematics, writing, science, and social studies. Schools administer the OGT generally to students in grades 10-12¹ in October and March during the school year. Students begin taking the OGT in March of their 10th grade year then continue to take tests for any unpassed subjects until passed.

On June 25, 2014, the Ohio Auditor of State (AOS) received a letter from the President of the Ohio Education Association (OEA), Rebecca Higgins, requesting the AOS examine certain irregularities involving the administration of annual State-mandated academic performance assessments at Horizon Science Academy in Dayton, Ohio. The letter stated an OEA member claimed he witnessed the alleged irregularities while he worked there. On July 15, 2014, former teachers of Horizon Science Academy of Dayton spoke before the State Board of Education and stated they had personal knowledge of attendance and testing irregularities at the school. Additionally, various news articles and other media accounts reported an on-going federal investigation involving the community schools operated by Concept Schools, Inc.

On July 2, 2014, the Auditor of State's Special Audit Task Force considered the letter from OEA and initiated a special audit of the 19 Horizon Science and Noble Academies. The purpose of the audit was to determine whether the Schools' were complying with State law governing test administration. This was done by examining the Schools' policies and procedures for administering annual State-mandated academic performance assessments. Separately, the Ohio Department of Education (ODE) initiated an investigation specifically into the alleged irregularities identified before the State Board of Education. On April 14, 2015, ODE appeared before the State Board of Education and announced that, but for a couple of matters not yet completed, ODE was unable to substantiate any of the allegations.

¹ Others eligible to take the OGT include adult high school students, OGT-only students/adults, and grade 6-9 STEM students

Supplement to the Special Audit Report

Objective No. 1 – Administering OAA and OGT Statewide Assessments

PROCEDURES

Through inquiry, interview, and examination of available documentation we obtained an understanding of the Schools' policies, procedures, and key controls for administering State-mandated OAA and OGT annual assessments.

We examined governing board adopted policies and procedures and other relevant documentation to assess compliance with significant statutes and rules governing the administration of State-mandated OAA and OGT annual assessments.

RESULTS

Concept Schools, Inc. operated 19 schools in Ohio during the period; 17 Horizon Science Academies (HSA) and two Noble Academies. The schools were generally located in and around the six urban cities of Cleveland, Columbus, Toledo, Dayton, Cincinnati, and Youngstown and served various grades. The Educational Service Center of Lake Erie West (ESC of LEW) sponsored eight schools and Buckeye Community Hope Foundation (BCHF), a not-for-profit organization, sponsored the remaining 11 schools. The following table identifies each school, its sponsor, grades served, and applicable assessments:

School	Sponsor	County	Grades Served	Assessments
HSA-Cincinnati	ESC of LEW	Hamilton	K-12	OAA & OGT
HSA-Youngstown	BCHF	Mahoning	K-8	OAA
HSA-Springfield	ESC of LEW	Lucas	K-8	OAA
HSA-Toledo	ESC of LEW	Lucas	K-12	OAA & OGT
HSA-Toledo Downtown	BCHF	Lucas	K-8	OAA
HSA-Dayton	ESC of LEW	Montgomery	K-4	OAA
HSA-Dayton Downtown	BCHF	Montgomery	K-7	OAA
HSA-Dayton High School	BCHF	Montgomery	7-12	OAA & OGT
HSA-Columbus	ESC of LEW	Franklin	9-12	OGT
HSA-Columbus Middle School	BCHF	Franklin	6-8	OAA
HSA-NE Columbus Elem. School	BCHF	Franklin	K-5	OAA
Noble Academy-Columbus	BCHF	Franklin	K-8	OAA
HSA-Cleveland	ESC of LEW	Cuyahoga	9-12	OGT
HSA-Cleveland Elem. School	BCHF	Cuyahoga	K-5	OAA
HSA-Cleveland Middle School	ESC of LEW	Cuyahoga	6-8	OAA
HSA-Denison Elementary School	BCHF	Cuyahoga	K-5	OAA
HSA-Denison Middle School	ESC of LEW	Cuyahoga	K-8	OAA
Noble Academy-Cleveland	BCHF	Cuyahoga	K-8	OAA
HSA-Lorain	BCHF	Lorain	K-12	OAA & OGT

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MANAGEMENT COMMENT

Polices and Written Procedures for Administering Assessments

We noted the Schools generally did not have written procedures for specific test administration aspects such as:

- Receipt of shrink wrapped testing packages (booklets and answer documents) from the testing distributor;
- Distribution of testing packages to testing administrators;
- Test Day proctoring and monitoring;
- Collection of completed assessments and answer documents both at the testing site and returned to the testing coordinator
- Ensuring the integrity of the test results;
- Physical security of the testing packages from their receipt through submission to the scoring vendor;
- Selection, education, and training of assigned school staff as testing coordinators, testing administrators, and testing monitors; and
- Investigation of alleged security or other assessment administration violations.

Generally, management articulated to auditors reasonably detailed procedures for many of the aspects listed. However, in 36 of 38 instances the Schools did not reduce those procedures to writing or include them in a comprehensive set of procedures to administer State required assessments. For specific results of the 19 schools examined, please refer to Appendix A of this report.

Written standard procedures reduce the risk of management's objectives for administering State required assessments are not clearly and consistently communicated and achieved. To increase the likelihood of successfully, ethically, and securely administering State required assessments consistently, we recommend the Schools evaluate their current procedures to ensure they address the areas noted and then memorialize those procedures in a set of comprehensive written procedures approved by their governing boards. Additionally, in some of these areas state statutes and Ohio Department of Education rules require written procedures containing certain content. A comprehensive set of written procedures for administering State required assessments will demonstrate compliance with those statutes and rules.

NONCOMPLIANCE CITATIONS

Defining, Communicating, and Monitoring Standards for Ethical Assessment Practices

Ohio Administrative Code Section 3301-07-01,(B)(1)-(2); (4); (7)-(9), states in pertinent part:

(B) Each participating school and district shall ensure that all appropriate staff have knowledge of these standards of ethical assessment practice and shall monitor the practices of all appropriate staff to ensure compliance with these standards. Each participating school's and district's duties shall include, but not be limited to, the following:

(1) Communicate in writing to all appropriate staff at least once annually the standards defining what is an unethical and/or inappropriate practice that are contained in paragraphs (C) to (E) of this rule as well as any additional standards of ethical assessment practice adopted by a participating school and district;

(2) Clearly define and communicate in writing at least once annually to all appropriate staff how the standards shall be monitored and what sanctions shall apply for any violations of the standards and under what circumstances such sanctions will apply;

...

(4) Clearly define and communicate in writing to all appropriate staff at least once annually all security procedures established by a participating school for each type of secure assessment identified in paragraph (A) of this rule, which shall include, but not be limited to, the test security provisions required by rule 3301-13-05 of the Administrative Code;

...

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- (7) Periodically review materials and practices related to preparing students for an assessment, administering and/or scoring an assessment, and/or interpreting and/or using any result of an assessment in order to ensure that the materials and practices are up-to-date, and clearly communicate in writing any additions or changes at least once annually to all appropriate staff;
- (8) Provide channels of communication that allow teachers, other educators, students, parents, and/or other members of the community to voice any concern about any practice they consider unethical and/or inappropriate; and
- (9) Establish written procedures for investigating any complaint, allegation, and/or concern about an unethical and/or inappropriate practice, ensuring protection of the rights of an individual, the integrity of an assessment, and any result of an assessment.

Responses and documentation provided by the schools demonstrated lack of clear understanding of the stated requirements; thus leading to noncompliance. Of the 19 schools examined, only three were able to provide documentation evidencing communication of the schools defined ethical assessment practices policies and procedures to the appropriate testing staff. In addition, only four schools provided documentation evidencing each clearly defined and communicated their monitoring and security procedures over administering the State assessment tests. For specific results of the 19 schools examined, please refer to Appendix A of this report. We recommend the schools become familiar with the requirements for administering State required assessments ethically, supplement current procedures, develop new procedures, and retain relevant documentation to clearly demonstrate compliance with the stated requirements.

Agreement to Follow Test Administration and Security Provisions

Ohio Administrative Code Section 3301-13-02(N)(9), states in pertinent part:

(N) During each test administration period, all assessments shall be administered by each participating school in accordance with the following provisions:

- ...
- (9) The examiner and all adult monitors assigned to a testing room shall be informed of, and agree to follow, all prescribed test administration and test security provisions; examiners and monitors shall remain in the assigned testing room during the entire administration of any test to assure compliance with paragraphs (N)(7) and (N)(8) of this rule;

Three of 19 Schools did not provide documentation evidencing employee acknowledgements. Twelve of 19 Schools provided employee acknowledgements; however, the acknowledgements were undated thus not demonstrating relevancy to the period examined. We recommend the Schools obtain dated employee acknowledgements when distributing required material and information.

Establishing Security and Investigation Provisions for Assessments

Ohio Administrative Code Section 3301-13-05 (H) and (J) state in pertinent part,

(H) Each school district and participating school shall establish written procedures to protect the security of the assessment materials from the time such materials are received in the school district or participating school until they are returned to the district's central collection location and from there shipped to the scoring contractor. Such procedures shall include, but not be limited to, the following:

- (1) Identification of each person by name with a designated title as being either a test coordinator, examiner, monitor, translator, or scribe in a school district or participating school who is authorized to be present in an assessment room during an assessment session, including a makeup session, and/or who is authorized to have access to the assessment materials;
- (2) Specification of procedures for handling, tracking, and maintaining security of assessment materials from the time and point of receipt in a school district or participating school until the time and point of shipping to the district's central collection location and from there shipped to the scoring contractor;

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(3) Specification of procedures for handling, tracking, and maintaining security of assessment materials at a site before, during, and after an assessment administration, including, but not limited to, procedures for accounting for and storing assessment booklets, answer documents, and all other assessment materials in a secure location before, during, after, and between assessment administration sessions;

(4) Specification of procedures for handling, tracking, and maintaining security of the assessment materials collected after the last regular assessment administration session until the return from the school building or participating school to the district's central collection location and from then until the pickup by the shipping to the scoring service provider. These specifications should also include procedures for handling, tracking, and maintaining security of assessment materials collected after the last makeup assessment administration session until the return from the school building or participating school to the district's central collection location and from then until the pickup by the shipping to the scoring service provider;

(5) Specification of a procedure for investigating any alleged violation of an assessment security provision or any alleged unethical testing practice, a procedure ensuring due process for any individual accused, and a procedure for determining an action or actions to be taken in response to any confirmed violation of section 3319.151 of the Revised Code, rule 3301-07-01-01 of the Administrative Code, this rule, or the school's security procedures, including, but not limited to, cheating by a student and/or by any other person assisting a student to cheat;

(6) Specification of a procedure for determining whether or not to invalidate a student's assessment score, which is an action a school district or participating school may take in response to an assessment security violation of section 3319.151 of the Revised Code, rule 3301-07-01-01 of the Administrative Code, an ethical testing practice, this rule, or the school's security procedures, which was caused either by a student and/or by any other person;

(7) Specification of how the written procedures established in accordance with this rule shall be communicated in writing and discussed each school year with all employees of the school district or participating school who have access to the secure assessment materials, with all students enrolled in the school district or participating school who are being tested, and with any other person authorized to be present in an assessment room and/or to have access to any assessment materials.

(J) By the first of October of each school year, each school district and participating school shall communicate in writing and discuss with all employees who have access to the secure assessment materials and students who are being tested the applicable written security procedures and actions to be taken in response to any violations established pursuant to paragraph (H) of this rule. Students and staff shall be reminded orally of these provisions prior to the beginning of each assessment administration period by an assessment coordinator and examiner.

Responses and documentation provided by the schools demonstrated lack of clear understanding of the stated requirements; thus leading to noncompliance. Generally, management articulated to auditors procedures Schools followed regarding assessment security. However, 17 of 19 schools failed to establish written policies and procedures that, if followed, would reasonably secure the assessment materials and student responses. Additionally, all 19 schools failed to communicate in writing and discuss the security assessment procedures with appropriate testing staff by October 1. For specific results of the 19 schools examined, please refer to Appendix A of this report. We recommend the Schools become familiar with the requirements for written security and investigation procedures, supplement current procedures, develop new procedures, and retain relevant documentation to clearly demonstrate compliance with the stated requirements.

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Appendix A - Individual School Results						
	HSA-Cincinnati	HSA-Youngstown	HSA-Springfield	HSA-Toledo	HSA-Toledo Downtown	HSA-Dayton
Written Procedures to Ensure Ethical Assessment Practices	N	N	N	N	N	N
Written Procedures to Ensure Assessment Security	Y	N	N	N	N	Y
OAC 3301-07-01(B)(1)*	Y	N	N	N	N	N
OAC 3301-07-01(B)(2)*	I2	I2	I2	I2	I2	I2
OAC 3301-07-01(B)(4)*	N	N	N	N	N	N
OAC 3301-07-01(B)(7)*	Y	Y	Y	Y	Y	Y
OAC 3301-07-01(B)(8)*	N	N	N	N	N	N
OAC 3301-07-01(B)(9)*	N	N	N	N	N	N
OAC 3301-13-02(M)*	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(7)*	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(8)*	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(9)*	N	I	N	I	I	I
OAC 3301-13-05(H)*	Y	N	N	N	N	Y
OAC 3301-13-05(J)*	N	N	N	N	N	N

	HSA-Dayton Downtown	HSA-Dayton High School	HSA-Columbus	HSA-Columbus Middle School	HSA-NE Columbus Elem School	Noble Academy-Columbus
Written Procedures to Ensure Ethical Assessment Practices	N	N	N	N	N	N
Written Procedures to Ensure Assessment Security	N	N	N	N	N	N
OAC 3301-07-01(B)(1)*	N	N	N	N	N	N
OAC 3301-07-01(B)(2)*	I2	I2	Y	I2	Y	N
OAC 3301-07-01(B)(4)*	N	N	N	N	N	N
OAC 3301-07-01(B)(7)*	Y	Y	Y	Y	Y	Y
OAC 3301-07-01(B)(8)*	N	N	N	N	N	N
OAC 3301-07-01(B)(9)*	N	N	N	N	N	N
OAC 3301-13-02(M)*	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(7)*	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(8)*	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(9)*	I	I	N	Y	I	I
OAC 3301-13-05(H)*	N	N	N	N	N	N
OAC 3301-13-05(J)*	N	N	N	N	N	N

* - See Appendix B for detailed description of OAC provision.

Y - School had written procedures/demonstrated compliance with the stated provision.

N - School did not have written procedures/did not demonstrate compliance with the stated provision.

I - Indeterminable; school provided testing provision employee acknowledgment forms; however, the acknowledgements were undated thus not demonstrating relevancy to the period examined.

I2 - Indeterminable; school provided personnel handbook acknowledgement forms; however, not all testing employee acknowledgements were provided or acknowledgements were not provided for the proper period.

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	HSA-Cleveland	HSA-Cleveland Elem School	HSA-Cleveland Middle School	HSA-Denison Elem School	HSA-Denison Middle School	Noble Academy-Cleveland	HSA-Lorain
Written Procedures to Ensure Ethical Assessment Practices	N	N	N	N	N	N	N
Written Procedures to Ensure Assessment Security	N	N	N	N	N	N	N
OAC 3301-07-01(B)(1)*	N	N	Y	Y	N	N	N
OAC 3301-07-01(B)(2)*	Y	I2	Y	I2	I2	I2	I2
OAC 3301-07-01(B)(4)*	N	N	N	N	N	N	N
OAC 3301-07-01(B)(7)*	Y	Y	Y	Y	Y	Y	Y
OAC 3301-07-01(B)(8)*	N	N	N	N	N	N	N
OAC 3301-07-01(B)(9)*	N	N	N	N	N	N	N
OAC 3301-13-02(M)*	Y	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(7)*	Y	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(8)*	Y	Y	Y	Y	Y	Y	Y
OAC 3301-13-02(N)(9)*	I	Y	I	Y	I	Y	I
OAC 3301-13-05(H)*	N	N	N	N	N	N	N
OAC 3301-13-05(J)*	N	N	N	N	N	N	N

* - See Appendix B for detailed description of OAC provision.

Y- School had written procedures/demonstrated compliance with the state provision.

N – School did not have written procedures/did not demonstrate compliance with the stated provision.

I – Indeterminable; school provided employee acknowledgments; however, the acknowledgments were undated thus not demonstrating relevancy to the period examined.

I2 – Indeterminable; school provided personnel handbook acknowledgement forms; however, not all testing employee acknowledgments were provided or acknowledgments were not provided for the proper period.

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Appendix B – Ohio Administrative Code Sections Governing State-mandated Annual Assessments

The following detailed OAC provisions identify the code provisions presented in Appendix A above:

Ohio Administrative Code Section 3301-07-01,(B)(1)-(2); (4); (7)-(9), states in pertinent part:

(B) Each participating school and district shall ensure that all appropriate staff have knowledge of these standards of ethical assessment practice and shall monitor the practices of all appropriate staff to ensure compliance with these standards. Each participating school's and district's duties shall include, but not be limited to, the following:

(1) Communicate in writing to all appropriate staff at least once annually the standards defining what is an unethical and/or inappropriate practice that are contained in paragraphs (C) to (E) of this rule as well as any additional standards of ethical assessment practice adopted by a participating school and district;

(2) Clearly define and communicate in writing at least once annually to all appropriate staff how the standards shall be monitored and what sanctions shall apply for any violations of the standards and under what circumstances such sanctions will apply;

...

(4) Clearly define and communicate in writing to all appropriate staff at least once annually all security procedures established by a participating school for each type of secure assessment identified in paragraph (A) of this rule, which shall include, but not be limited to, the test security provisions required by rule 3301-13-05 of the Administrative Code;

...

(7) Periodically review materials and practices related to preparing students for an assessment, administering and/or scoring an assessment, and/or interpreting and/or using any result of an assessment in order to ensure that the materials and practices are up-to-date, and clearly communicate in writing any additions or changes at least once annually to all appropriate staff;

(8) Provide channels of communication that allow teachers, other educators, students, parents, and/or other members of the community to voice any concern about any practice they consider unethical and/or inappropriate; and

(9) Establish written procedures for investigating any complaint, allegation, and/or concern about an unethical and/or inappropriate practice, ensuring protection of the rights of an individual, the integrity of an assessment, and any result of an assessment.

Ohio Administrative Code Section 3301-13-02 (M), states in pertinent part:

(M) To facilitate test administration at each grade, each school district and participating school shall annually appoint one named person in a school district and one person in each building, as the case may be, whose duties shall be to ensure that all of the test administration and test security provisions included in Chapters 3301-13 and 3301-7 of the Administrative Code and all testing procedures adopted by the department of education and by a participating school are followed explicitly by all appropriate staff. In addition, each participating school shall appoint a sufficient number of named examiners and monitors to satisfy the provisions of paragraphs (N)(7) and (N)(8) of this rule.

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Ohio Administrative Code Section 3301-13-02 (N)(7)-(9), states in pertinent part:

(N) During each test administration period, all assessments shall be administered by each participating school in accordance with the following provisions:

(7) Each test administration session in each testing room shall be conducted by a licensed staff member or a staff member certificated under sections [3301.071](#) and [3319.22](#) of the Revised Code and Chapter 3301-24 of the Administrative Code who is employed by the participating school, is assigned to that testing room as the examiner, and is responsible for following explicitly the printed test administration directions provided by the department of education and all security provisions included in Chapter 3301-13 and rule [3301-7-01](#) of the Administrative Code and all testing procedures adopted by the department of education and established by the participating school;

(8) When the number of students taking any test in an assigned testing room exceeds thirty, additional licensed staff and/or adult volunteers shall be assigned as test monitors to that room in sufficient numbers to ensure that the ratio of examinees to examiners or adult monitors does not exceed thirty to one at any time in any test administration room;

(9) The examiner and all adult monitors assigned to a testing room shall be informed of, and agree to follow, all prescribed test administration and test security provisions; examiners and monitors shall remain in the assigned testing room during the entire administration of any test to assure compliance with paragraphs (N)(7) and (N)(8) of this rule;

Ohio Administrative Code Section 3301-13-05 (H) and (J) state in pertinent part,

(H) Each school district and participating school shall establish written procedures to protect the security of the assessment materials from the time such materials are received in the school district or participating school until they are returned to the district's central collection location and from there shipped to the scoring contractor. Such procedures shall include, but not be limited to, the following:

(1) Identification of each person by name with a designated title as being either a test coordinator, examiner, monitor, translator, or scribe in a school district or participating school who is authorized to be present in an assessment room during an assessment session, including a makeup session, and/or who is authorized to have access to the assessment materials;

(2) Specification of procedures for handling, tracking, and maintaining security of assessment materials from the time and point of receipt in a school district or participating school until the time and point of shipping to the district's central collection location and from there shipped to the scoring contractor;

(3) Specification of procedures for handling, tracking, and maintaining security of assessment materials at a site before, during, and after an assessment administration, including, but not limited to, procedures for accounting for and storing assessment booklets, answer documents, and all other assessment materials in a secure location before, during, after, and between assessment administration sessions;

(4) Specification of procedures for handling, tracking, and maintaining security of the assessment materials collected after the last regular assessment administration session until the return from the school building or participating school to the district's central collection location and from then until the pickup by the shipping to the scoring service provider. These specifications should also include procedures for handling, tracking, and maintaining security of assessment materials collected after the last makeup assessment administration session

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until the return from the school building or participating school to the district's central collection location and from then until the pickup by the shipping to the scoring service provider;

(5) Specification of a procedure for investigating any alleged violation of an assessment security provision or any alleged unethical testing practice, a procedure ensuring due process for any individual accused, and a procedure for determining an action or actions to be taken in response to any confirmed violation of section 3319.151 of the Revised Code, rule 3301-07-01-01 of the Administrative Code, this rule, or the school's security procedures, including, but not limited to, cheating by a student and/or by any other person assisting a student to cheat;

(6) Specification of a procedure for determining whether or not to invalidate a student's assessment score, which is an action a school district or participating school may take in response to an assessment security violation of section 3319.151 of the Revised Code, rule 3301-07-01-01 of the Administrative Code, an ethical testing practice, this rule, or the school's security procedures, which was caused either by a student and/or by any other person;

(7) Specification of how the written procedures established in accordance with this rule shall be communicated in writing and discussed each school year with all employees of the school district or participating school who have access to the secure assessment materials, with all students enrolled in the school district or participating school who are being tested, and with any other person authorized to be present in an assessment room and/or to have access to any assessment materials.

(J) By the first of October of each school year, each school district and participating school shall communicate in writing and discuss with all employees who have access to the secure assessment materials and students who are being tested the applicable written security procedures and actions to be taken in response to any violations established pursuant to paragraph (H) of this rule. Students and staff shall be reminded orally of these provisions prior to the beginning of each assessment administration period by an assessment coordinator and examiner.



Dave Yost • Auditor of State

HORIZON SCIENCE AND NOBLE ACADEMIES

FRANKLIN COUNTY

CLERK'S CERTIFICATION

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

Susan Babbitt

CLERK OF THE BUREAU

**CERTIFIED
OCTOBER 20, 2015**