



Public Schools of North Carolina
State Board of Education
Department of Public Instruction

Report to the North Carolina General Assembly

Statewide Administration of the Testing
Program

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(e)

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Introduction

General Statute §115C-174.12 (d) requires “by October 1 of each year, each local board of education shall notify the State Board of Education (SBE) of any local standardized testing to be administered to students by the local school administrative unit at the direction of the local board of education in its schools and the calendar for administering those tests. The local board of education shall include the following information:

- (1) the source of funds supporting the local testing program;
- (2) the time allotted to administer each test;
- (3) whether the test is a computer-based test or a paper-based test;
- (4) the grade level or subject area associated with the test;
- (5) the date the test results are expected to be available to teachers and parents;
- (6) the type of test, the purpose of the test, and the use of the test results; and
- (7) estimates of average time for administering tests required by the local board of education by grade level.”

Section (e) of the same legislation requires the SBE to “submit a report to the Joint Legislative Education Oversight Committee containing information regarding the statewide administration of the testing program, including the number and type of tests and the testing schedule, and a summary of any local testing programs reported by local boards of education to the SBE in accordance with subsection (d).”

Section (e1) of this legislation requires “by September 1 of each year, the Superintendent of Public Instruction shall publish on the Web site of the Department of Public Instruction a uniform calendar that includes schedules for state-required testing and reporting results of tests for at least the next two school years, including estimates of the average time for administering state-required standardized tests. The uniform calendar shall be provided to local boards of education in an electronic format that allows each local board of education to populate the calendar with, at a minimum, the information required by subsection (d) of this legislation. The uniform calendar must be searchable by local school administrative unit and denote whether a test on the calendar is required by the state or required by a local board of education.”

This report addresses the above legislative directives with respect to the current (2019–20) school year. The report has two sections: the first section provides the information regarding the statewide testing program, and the second section provides information gathered from local boards of education regarding local testing programs.

Statewide Testing Program

The North Carolina Department of Public Instruction's (NCDPI) Accountability Services Division (www.ncpublicschools.org/accountability/) ensures that North Carolina's statewide testing program meets the requirements of all applicable state and federal laws. These laws are designed to promote student academic achievement and to assist stakeholders in understanding and gauging this achievement against standards. To these ends, the NCDPI Accountability Services Division endeavors to accomplish the following three main objectives:

- (1) Design and development of reliable and valid assessment instruments,
- (2) Uniform implementation of and access to suitable assessment instruments for all students, and
- (3) Provision of accurate and statistically appropriate reports.

To meet these objectives, the NCDPI supports and/or administers an array of statewide standardized assessments ranging in purpose from placement to summative measurement of academic achievement and ranging in grade from kindergarten to grade twelve. The NCDPI ensures that all assessments are accessible to every North Carolina student, including students with disabilities. Per G.S. §115C-174.12(a)(4), "all annual summative assessments of student achievement adopted by the State Board of Education (SBE) and all final exams for courses are administered within the final ten (10) instructional days of the school year for year-long courses and within the final five (5) instructional days of the semester for semester courses." The W-APT and the WIDA Screener are placement tests administered to newly arrived English Learners within the first thirty (30) days of enrollment in a school. The college-and-career readiness testing, which includes Pre-ACT, ACT, and ACT WorkKeys, occurs during set windows during the fall and spring semesters.

Funding sources for the North Carolina Testing Program are the North Carolina Public School Fund (approximately seventy-five percent [75%]) and a State Assessment Grant from the federal government (approximately twenty-five percent [25%]). A separate allocation from the General Assembly funds the ACT suite.

In response to Section (e1) of this legislation, on September 1, 2019, the Superintendent of Public Instruction published on the website of the NCDPI a uniform calendar that includes the administration dates and times for all state-required testing and reporting results of tests for the next two school years. On August 1, 2019, a uniform calendar (survey) was provided to local boards of education in an electronic format which allowed each local board of education to populate the calendar with, at minimum, the information required by subsection (d) of the legislation. The uniform state and local calendars are published on the NCDPI's website at <http://www.ncpublicschools.org/accountability/> and are searchable by LEA and denote whether a test on the calendar is required by the state or required by a local board of education.

In addition, the NCDPI publishes annually the North Carolina Statewide Testing Program Operational Calendar. The operational calendar for 2019–20 is located at <http://www.ncpublicschools.org/accountability/> and is as follows:

**North Carolina Testing Program Operational Calendar
2019–20 School Year–Summer**

Assessment	Grades Tested	Frequency of Administration	Administration Time in Minutes	Testing Window
W–APT ¹	Kindergarten and First Semester Grade 1	Once upon initial enrollment	60–70	Initial assessment required within 30 days of initial enrollment
WIDA™ Screener ¹	Second Semester Grade 1 through Grade 12	Once upon initial enrollment	70	Initial assessment required within 30 days of initial enrollment
End-of-Course Tests	The grade in which the course is taken	Once at the completion of the course	Biology–120 English II–150 NC Math 1–180 NC Math 3–180	Final 5 instructional days of the summer school course
Credit by Demonstrated Mastery (CDM) Phase 1 Assessments ²	For EOC tests only	One Day	Biology–120 English II–150 NC Math 1–180 NC Math 3–180	July 18–31, 2019
Read to Achieve Test ³	Grade 3	One Day	160	Locally determined date at the conclusion of reading camp

¹ To be identified as English Learners (ELs), students indicating a language other than English on the Home Language Survey (HLS) must be assessed using the state EL identification test at initial enrollment. The W–APT™ is the state-identified EL proficiency identification assessment given to students in kindergarten and in first semester of grade 1. The WIDA Screener is the state-identified EL proficiency identification assessment given to students in second semester grade 1 through grade 12. All students identified as ELs must be annually assessed using the state EL proficiency test.

² Credit by Demonstrated Mastery (CDM) is the process by which local education agencies (LEAs)/charter schools shall, based upon a body-of-evidence, award a student credit in a particular course without requiring the student to complete classroom instruction for a certain amount of seat time.

³ Students who have not demonstrated reading proficiency at or above the third-grade level by the end of the third-grade year are provided an opportunity to take the Read to Achieve Test at the end of reading camp on a day designated by the LEA.

Summer Administrations of End-of-Grade and End-of-Course Tests for Accountability

Districts/charter schools may administer end-of-grade (EOG) and end-of-course (EOC) tests during summer programs that have been approved by their local board and occur after the regular academic year is completed. Summer program scores uploaded to the NCDPI by 5:00 p.m. July 6, 2019 were included in 2018–19 accountability calculations. Summer program scores uploaded to the NCDPI after July 6, 2019, will be included in the 2019–20 accountability analysis. Summer program administration scores will be counted only for proficiency, not growth.

North Carolina Testing Program Operational Calendar 2019–20 School Year–Fall

Assessment	Grades Tested	Frequency of Administration	Administration Time in Minutes	Testing Window
W–APT	Kindergarten and First Semester Grade 1	Once upon initial enrollment	60–70	Initial assessment required within 30 days of initial enrollment
WIDA Screener	Second Semester Grade 1 through Grade 12	Once upon initial enrollment	70	Initial assessment required within 30 days of initial enrollment
Beginning-of-Grade 3 English Language Arts/Reading Test	Grade 3	One Day	90	The testing window begins on the 11 th day of the school year and continues through the 15 th day.
Credit by Demonstrated Mastery (CDM) Phase 1 Assessments	For EOC and NCFE assessments only	One Day	Biology–120 English II–150 NC Math 1–180 NC Math 3–180 NCFEs–120	September 17–30, 2019
PreACT®	Grade 10	One Day	130	October 14–November 22, 2019
College and Career Readiness Alternate Assessment (CCRAA) ¹	Grade 10	One Day	150	October 14–November 22, 2019
ACT® WorkKeys	Concentrators (High School)	One Day	165	December 2–13, 2019
End-of-Course Tests	The grade in which the course is taken	Once at the completion of the course	Biology–120 English II–150 NC Math 1–180 NC Math 3–180	Final 5 instructional days of the semester (4x4/semester courses)
NC Final Exams	The grade in which the course is taken	Once at the completion of the course	120	Final 5 instructional days of the semester (4x4/semester courses)
Read to Achieve Test ²	Grade 4	One Day	160	Locally determined date by November 1, 2019

¹ The grade 10 College and Career Readiness Alternate Assessment (CCRAA) is an alternate assessment to the PreACT.

² Students with a retained reading label in either a 3/4 transitional class or a grade 4 accelerated class are provided an additional opportunity to satisfy the Read to Achieve legislation by passing the Read to Achieve Test by November 1.

**North Carolina Testing Program Operational Calendar
2019–20 School Year–Spring**

Assessment	Grades Tested	Frequency of Administration	Administration Time in Minutes	Testing Window
W–APT	Kindergarten and First Semester Grade 1	Once upon initial enrollment	60–70	Initial assessment required within 30 days of initial enrollment
WIDA Screener	Second Semester Grade 1 through Grade 12	Once upon initial enrollment	70	Initial assessment required within 30 days of initial enrollment
ACCESS for ELLs ^{®1}	Kindergarten through Grade 12	Once annually	30–65	January 27–March 6, 2020
Alternate ACCESS for ELLs ^{®2}	Grades 1–12	Once annually	80	January 27–March 6, 2020
Credit by Demonstrated Mastery (CDM) Phase 1 Assessments	For EOC and NCFE assessments only	One Day	Varies by CDM assessment	February 17–28, 2020
ACT [®] (Paper/Pencil)	Grade 11	One Day	215	February 25, 2020 (initial) March 17, 2020 (makeup)
ACT [®] Accommodations Testing Window (Paper/Pencil)	Grade 11	One Day	215 (varies by timing code)	February 25–28, March 2–6, 2020 (initial) March 17–20 and March 23–27, 2020 (makeup)
ACT [®] –Online	Grade 11	One Day	215	February 25–27, March 3–5, 2020 (initial) March 17–19, and March 24–26, 2020 (makeup)
College and Career Readiness Alternate Assessment ³	Grade 11	One Day	150	February 25–28, March 2–6, 2020 (initial) March 17–20 and March 23–27, 2020 (makeup)
NCEXTEND1 Alternate Assessment ⁴	Grade 11	One Day	Untimed (unique to each individual student)	February 25–28, March 2–6, 2020 (initial) March 17–20 and March 23–27, 2020 (makeup)
ACT [®] WorkKeys	CTE Concentrators (High School)	One Day	165	March 30–April 10, 2020
NCEXTEND1 Alternate Assessments ⁵	Grades 3–8, 10	One Day	Untimed (unique to each individual student)	Final 10 instructional days of the school year
End-of-Course Tests	The grade in which the course is taken	Once at the completion of the course	Biology–120 English II–150 NC Math 1–180 NC Math 3–180	Final 5 instructional days of the semester (4x4/semester courses); Final 10 instructional days of the school year (yearlong courses)
End-of-Grade Tests	Grades 3–8 Reading & Math; Grades 5 & 8 Science	Once at the completion of the school year	Reading–120 Math–120 Science–120	Final 10 instructional days of the school year
Read to Achieve Test ⁶	Grade 3	One Day	TBD	Final 10 instructional days of the school year
End-of-Grade Retest ⁶	Grade 3	One Day	120	Final 10 instructional days of the school year
NC Final Exams	The grade in which the course is taken	Once at the completion of the course	120	Final 5 instructional days of the semester (4x4/semester courses); Final 10 instructional days of the school year (yearlong courses)

¹ The ACCESS for ELLs is the state-designated EL proficiency assessment administered annually to kindergarten through twelfth-grade students who have been identified as ELs.

² The Alternate ACCESS for ELLs is for students in grades 1–12 who are classified as ELs and have significant cognitive disabilities that prevent their meaningful participation in the general ACCESS for ELLs assessment.

³ The grade 11 College and Career Readiness Alternate Assessment is an alternate assessment to the ACT.

⁴ The grade 11 NCEXTEND1 Alternate Assessment is the alternate assessment to the ACT.

⁵ The NCEXTEND1 Alternate Assessments at grades 3–8 and 10 are the alternate assessments for the end-of-grade and end-of-course tests of reading, mathematics, and science.

⁶ Students at grade 3 who failed to demonstrate reading proficiency appropriate for a third-grade student on the regular (first) administration of the EOG Reading test may take the Read to Achieve Test and/or the EOG Reading Retest as an option to satisfy the requirements of the Read to Achieve legislation.

2019–20 School Year–National Assessment of Educational Progress (NAEP) and International Assessments¹

Assessment	Ages Tested	Frequency of Administration	Number of Schools Participating	Administration Time in Minutes	Testing Window
NAEP 2019–20 Long Term Trend (LTT)	Ages 9, 13, 17	One Day	30	90	October 14, 2019–May 22, 2020

¹ The National Center for Education Statistics (NCES) selects a nationwide sample of schools and students for participation in NAEP 2019–20. Local education agencies (LEAs) and schools selected to participate were notified in May 2019.

The NCDPI Accountability Services Division also provides accurate and statistically appropriate reports for public use through the following websites:

- Accountability and Testing Results (www.ncpublicschools.org/accountability/reporting/)
- NC School Report Cards (www.ncpublicschools.org/src/)

Local Testing Programs

Background

“General Statute §115C-174.12 (d) requires each local board of education to “notify the SBE of any local standardized testing to be administered to students by the local school administrative unit at the direction of the local board of education in its schools and the calendar for administering those tests.”

To standardize and make comparable the information submitted by local education agencies (LEAs) in response to the legislation, the NCDPI created a standard format and specific requirements for LEAs to use for their submissions. The NCDPI collected the LEA submissions from August 1, 2019 through October 1, 2019. In the instructions and supporting materials the NCDPI provided to LEAs, “local testing” was defined, for the purposes of this report, as follows:

- “Testing that is administered in schools within local school administrative units as initiated by the LEA and administered either LEA- or school-wide (including for all students of one grade in a district or school).”
- Testing that is initiated by classroom teachers was to be considered part of the teachers’ instructional practice and thus, not considered local testing for the purposes of this report.
- Testing that is required or recommended by the state (including testing that offers local discretion related to the particular “brand” or form used) was not considered local testing for the purposes of this report.

As directed by G.S. §115C-174.12(e), “a summary of any local testing programs reported by

local boards of education to the State Board of Education in accordance with [the legislation]” is provided in this report.

Student Teams Achieving Results (STAR) Research Study

In 2017, a team of University of North Carolina (UNC) Master of Business Administration (MBA) and undergraduate students participating in the Student Teams Achieving Results (STAR) program, conducted a study at the request of the State Superintendent on testing burden and district-reported assessments. The team evaluated the survey used by the NCDPI to collect local assessment information and analyzed the resulting data. Team members made recommendations for ways to improve the survey, used interactive tools to provide visualizations of the data to inform stakeholders and the public, and noted areas of potential inefficiencies or duplication. Their work led to more accurate data collection and an interactive report available on the NCDPI website at <http://www.ncpublicschools.org/accountability/>. The interactive report is intended to allow viewers to create customized views based on their areas of interest, whether they are interested in state-level or district-level information, for all grades or for specific grade levels. Both an instructional guide and a video that explains how to use the tool is provided.

Summary of Information Submitted by Local Boards of Education

All 115 LEAs reported the “local testing” that is initiated by the LEA and administered either LEA- or school-wide. The extent of local testing appears to vary widely across the LEAs, ranging from zero to 32 assessments. Only three LEAs¹ do not administer district-mandated assessments. Unless otherwise noted in this report, a total of 688 local tests were reported statewide.

The NCDPI used the data to describe the following aspects of local testing (as required by the legislation):

- “local testing to be administered to students by the local school administrative unit at the direction of the local board of education in its schools,
- the calendar for administering those tests,
- the source of funds supporting the local testing program,
- the time allotted to administer each test,
- whether the test is a computer-based test or a paper-based test,
- the grade level or subject area associated with the test,
- the date the test results are expected to be available to teachers and parents,
- the type of test, the purpose of the test, and the use of the test results, and
- estimates of average time for administering tests required by the local board of education by grade level.”

Local Testing: Type of Test, Test Subject, and Grade Level

Across the 112 LEAs, the focus of local testing programs appears to be benchmark/interim and formative assessments. Of the 688 local tests reported, over 300 falls into each category. “Benchmark” and “interim” are two terms used typically, and often interchangeably, by district and school personnel to describe tests that are administered throughout the school year but not at the end of the school year. These tests, which are designed to measure at a point in time a student’s progress toward mastery of content, may or may not be directly aligned with the state end-of-grade (EOG) or end-of-course (EOC) summative assessments. Since some local districts use the term “interim” for this type of test, while others use the term “benchmark,” the local testing data collection offered LEAs either term as an option for describing local testing. As seen

¹ Clay County, Tyrrell County, and Whiteville City

in Figure 1, the terms are combined for purposes of understanding the type of local testing being conducted in North Carolina.

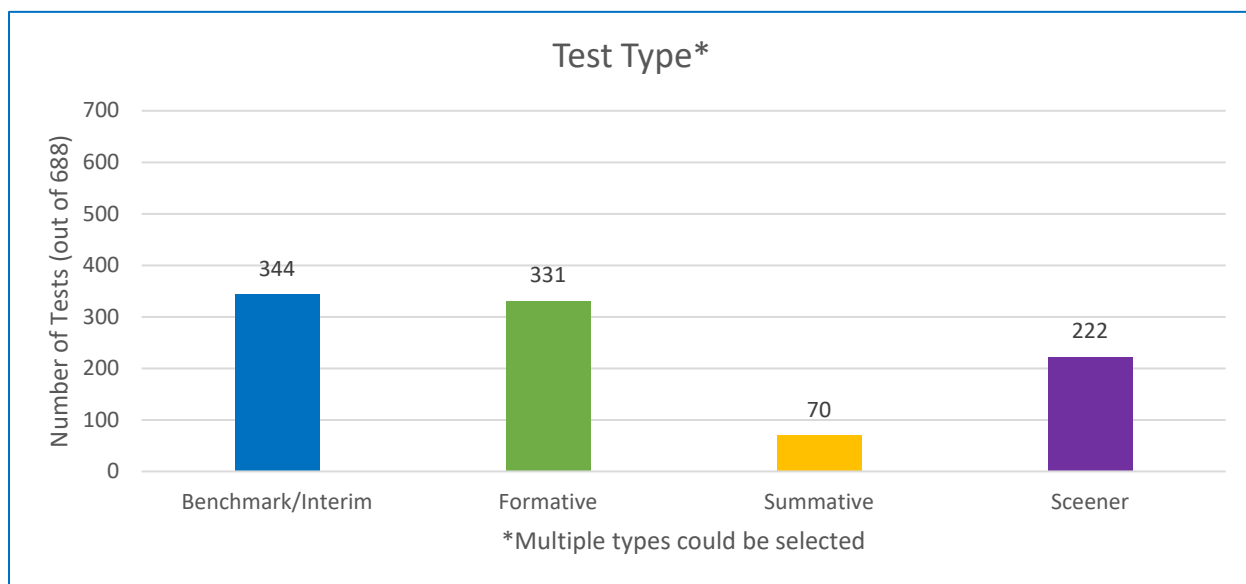


Figure 1. Type of tests administered locally.

The focus of local testing appears to be on the core subject areas of reading and mathematics (see Figure 2). These subjects are the focus of the statewide EOG and EOC tests used for state and federal school accountability purposes.

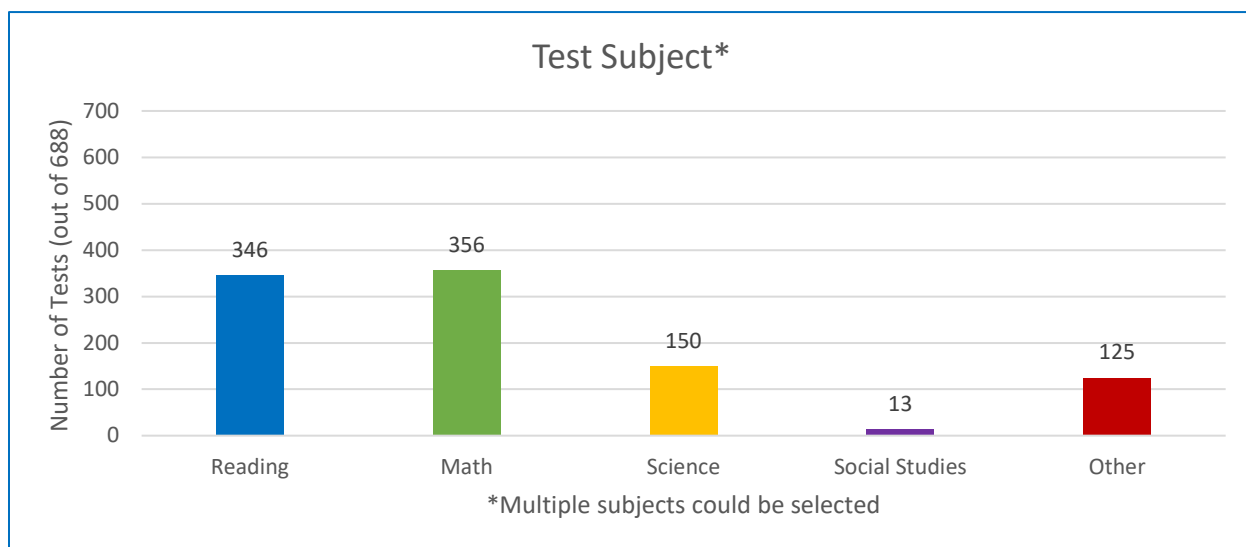


Figure 2. Subject areas tested locally.

As seen in Table 1 and Figure 3, more local testing occurs in grades 3, 4, 5, and 8. Overall, students in grades 3 through 8 are tested more than students in elementary grades K–2 and high school grades 9–13.

Table 1. *Grades Tested**

Grade Level	Frequency	Percent of 688 Tests Given
Kindergarten (K)	119	17.3
Grade 1	141	20.5
Grade 2	166	24.1
Grade 3	344	50.0
Grade 4	351	51.0
Grade 5	392	57.0
Grade 6	308	44.8
Grade 7	297	43.2
Grade 8	364	52.9
Grade 9	161	23.4
Grade 10	116	16.9
Grade 11	91	13.2
Grade 12	52	7.6
Grade 13	9	1.3

*Districts could select more than one option for the grades tested. Percentages in this case will sum to over 100, and the N will sum to over 688.

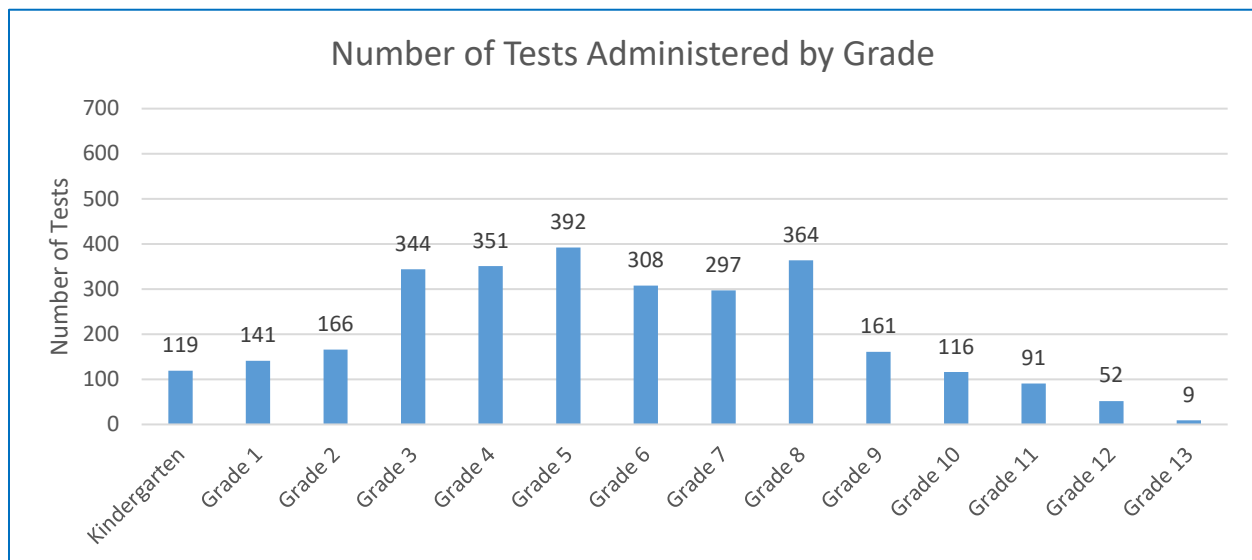


Figure 3. Number of tests administered by grade.

Delivery Mode

Over fifty percent of the 112 LEAs reported that local testing was administered online rather than paper/pencil (see Figure 4). Effective with the 2017–18 school year, the North Carolina Testing Program provides all state assessments in both online and paper/pencil modes. Many of the state-administered assessments are required online administrations (i.e., all EOC tests [English II, NC Math 1, NC Math 3, Biology]; EOG Science tests; EOG Mathematics tests[grades 5 and 8]; all North Carolina Final Exams; WIDA Screener; ACCESS for ELLs; and NCEXTEND1 Reading, Mathematics, and Science [Grades 3–8 and 10]). The NCDPI encourages districts and schools to continue to move toward online tests as much as their local technical infrastructure will allow.

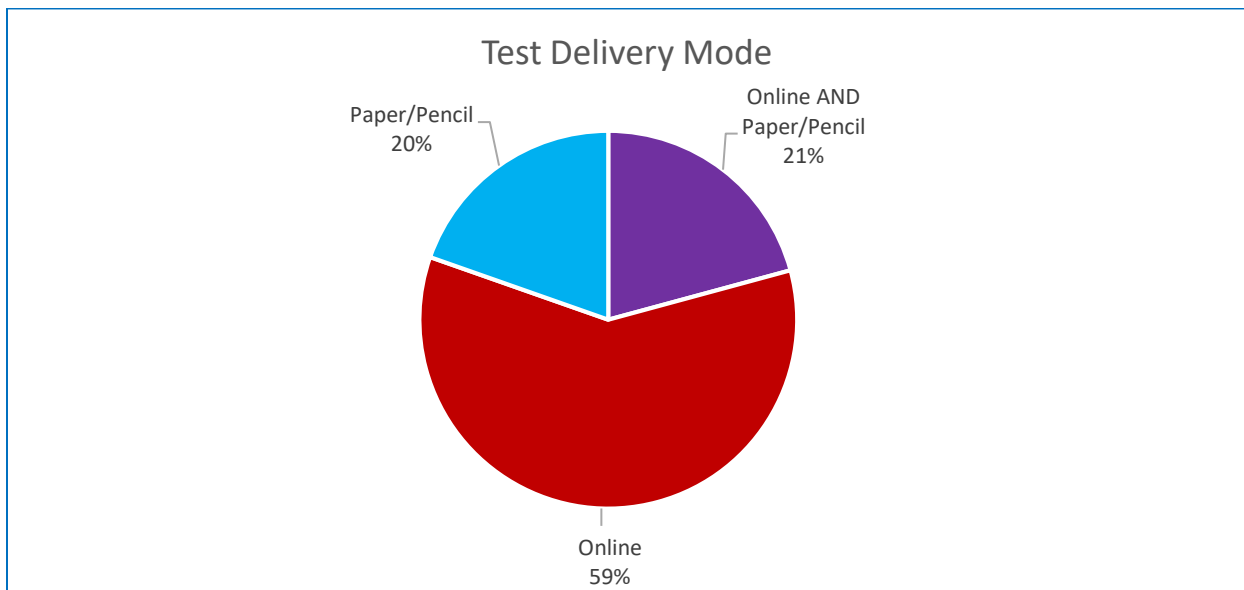


Figure 4. Test delivery mode.

Calendar for Administering Local Testing

To administer local tests, LEAs establish testing windows during which each test is to be given either LEA-wide, sometimes staggered to occur at different times at particular schools, or for particular grades. These testing windows typically have a start date—the initial date on which students may be tested somewhere, if not everywhere, in the LEA—and then schools have discretion regarding when they schedule school- or grade-wide testing. Some of the testing may even be scheduled on a given day for students in small groups or for individuals, depending upon a school’s resources and/or the accommodations required by individual students. A testing window may therefore be many days long, so that all students in the target population can be tested, but that does not imply that each individual student undergoes testing more than once in the window or for an extended period of time. For example, during a scheduled LEA testing window of 15 days for a particular benchmark/interim, each student may undergo less than one full school day of testing. That said, a summary of testing windows does provide insight into how much time LEAs are building into their academic calendars to administer local testing programs.

Statewide, in every month of the school year, at least one local testing window is scheduled to begin. The most common months during which local testing windows begin are October and January (see Figure 5).

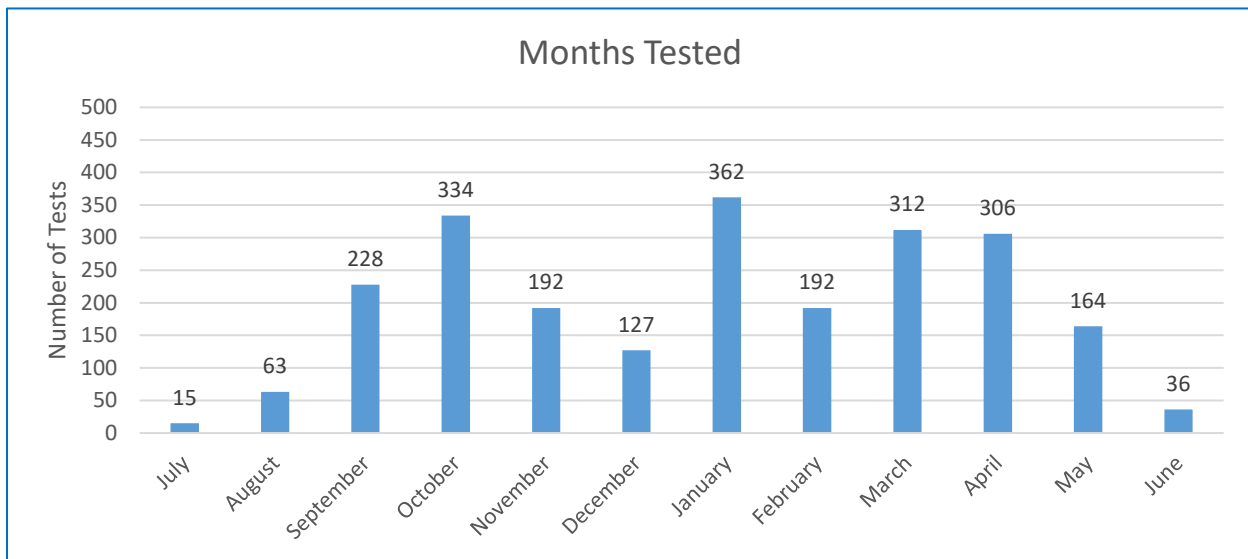


Figure 5. The months local testing windows begin.

Figure 6 is a picture of one of the interactive calendar maps that are available under the *Total Time Allotted For All Tests By Grade and Month* tab of the [Interactive Local Testing Report](#), found on the Accountability Services website. This picture shows the total number of minutes allotted for all tests by grade and month. The purpose of this view is to show the months where students take tests for the longest time. Two additional interactive calendar maps show (1) the average number of minutes allotted for local tests by grade and month and (2) the total number of local tests given in the state each month by grade.

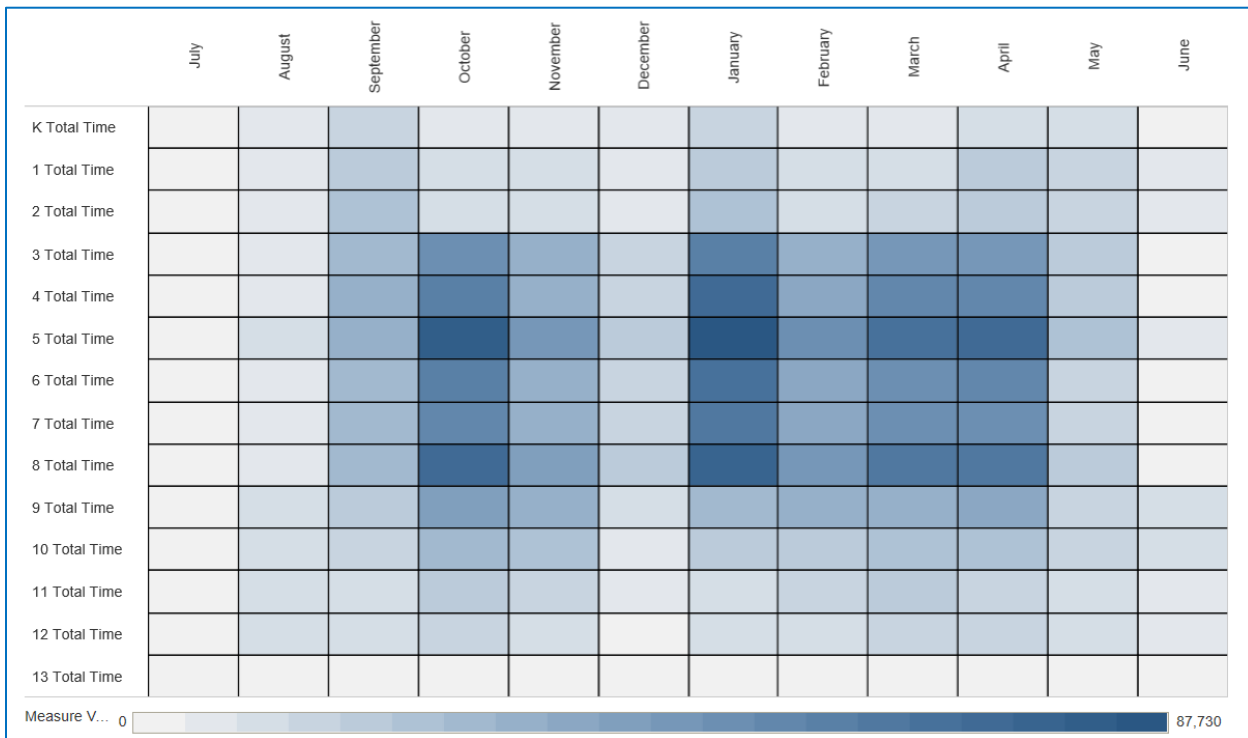


Figure 6. Total Minutes for All Tests by Grade and Month

As shown in Figure 7, the length of scheduled testing windows appears to vary between one (1) day and more than fifteen (15) days, with five (5) days being the most common number reported.

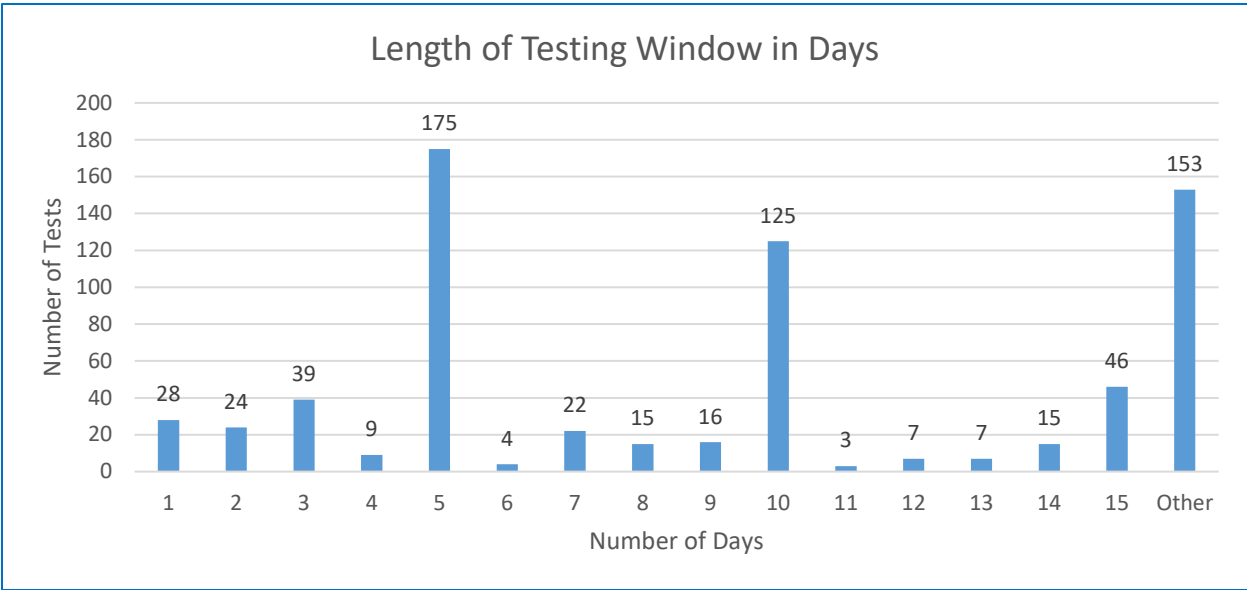


Figure 7. The length of testing windows in days.

Time Allotted for Standard Administration

The time LEAs allot for standard administrations of local assessments varies from 30 minutes or less to more than five (5) hours (see Figure 8). Across the 112 LEAs, nearly forty percent (40%) of the tests administered require 61 to 90 minutes for the standard administration.

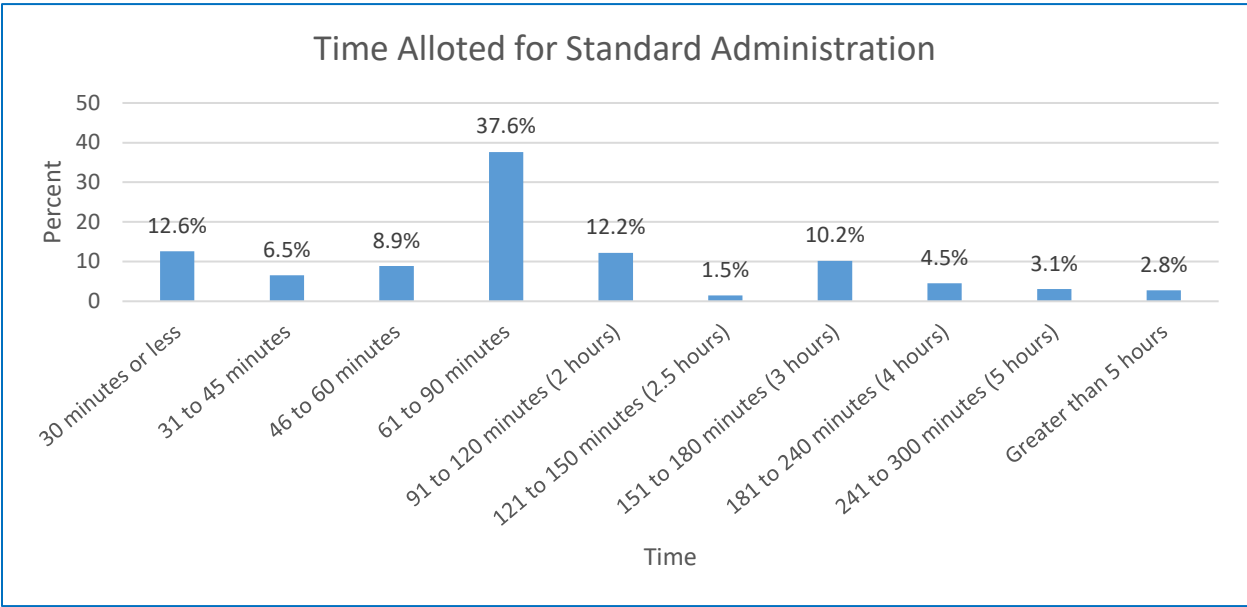


Figure 8. LEAs’ estimated time for standard administration of local assessments.

The map in Figure 9 shows the time allotted per year for local tests administered by district at grade 3. Interactive maps for grades kindergarten (K) through grade 13 are located in the [Interactive Local Testing Report](#), found on the Accountability Services website, under the *Grades K–13: Time Allotted for Testing* tabs. The interactive, grade level maps include the

average frequency (the number of times the test is administered per year), the average time allotted per test, the average time allotted in minutes, and the average time allotted in hours by district.

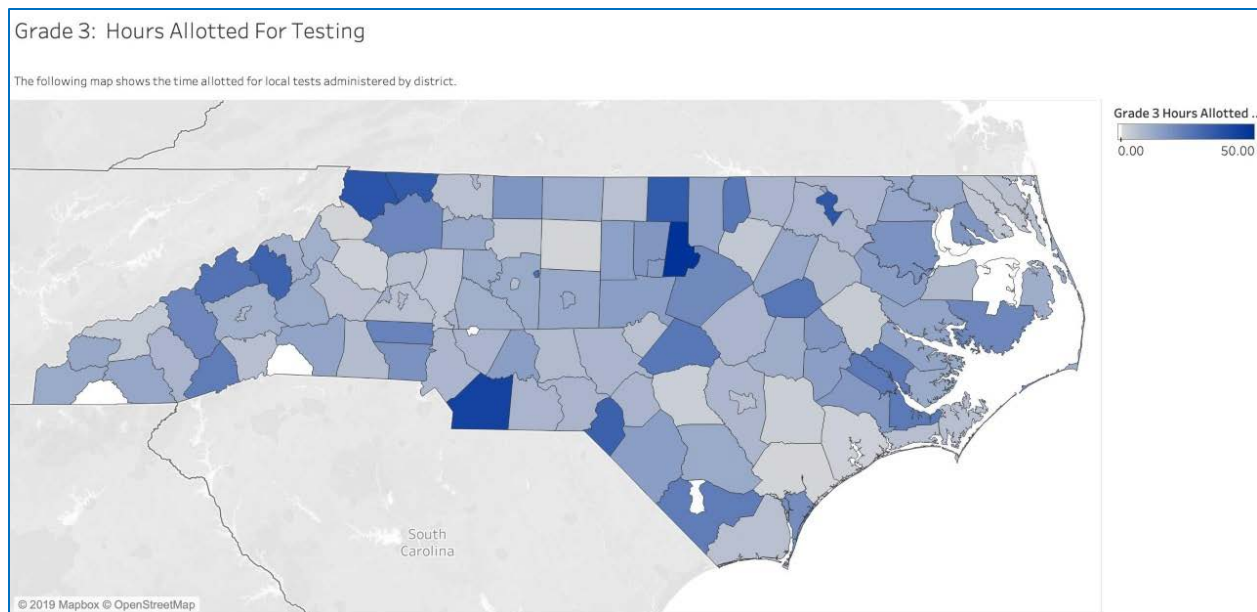


Figure 9. Hours Allotted for Testing in Grade 3 by District

Test Format and Availability of Results

Regardless of the mode of delivery (i.e., online or paper/pencil), assessments that contain multiple-choice test items only allow LEAs to get test results within the same day of the test administration. Assessments that contain performance items, such as constructed response or short answer items, take longer to score. The scoring process for performance items usually begins the morning after the test record is received by the vendor/scorer. The results are returned to the LEA within approximately five (5) to seven (7) business days. A summary of the data in Figures 10 and 11, shows that most of the local assessments contain multiple-choice items only (79.2%), and that most of the teachers (60.5%) can get results back from these assessments within the same day or within one day of the administration.

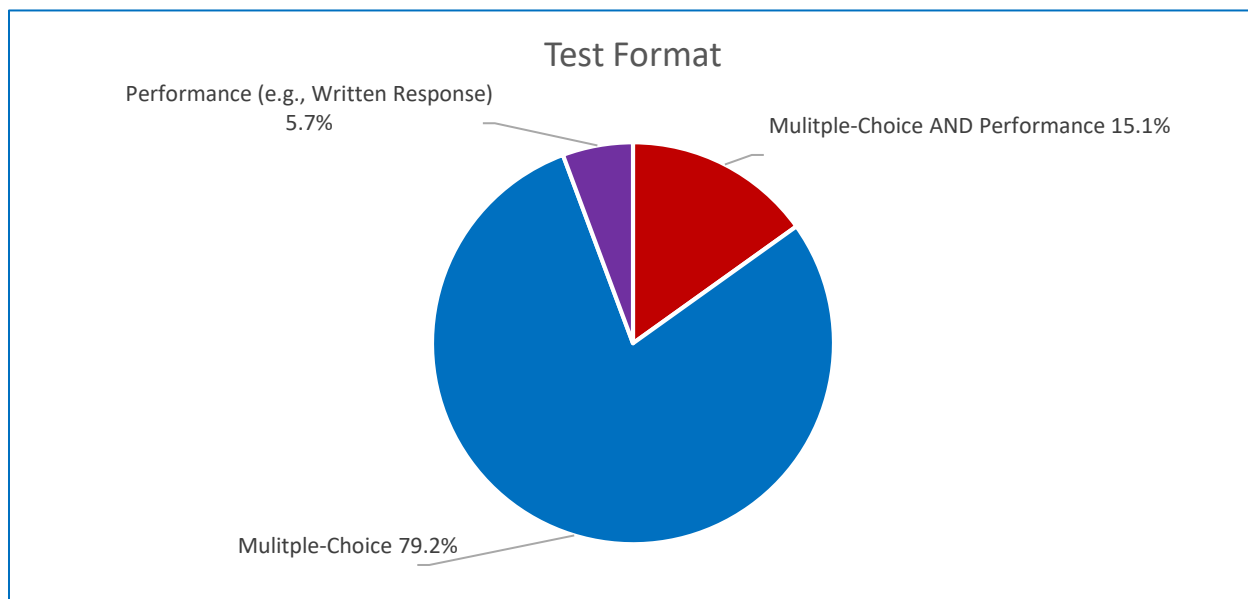


Figure 10. Test format.

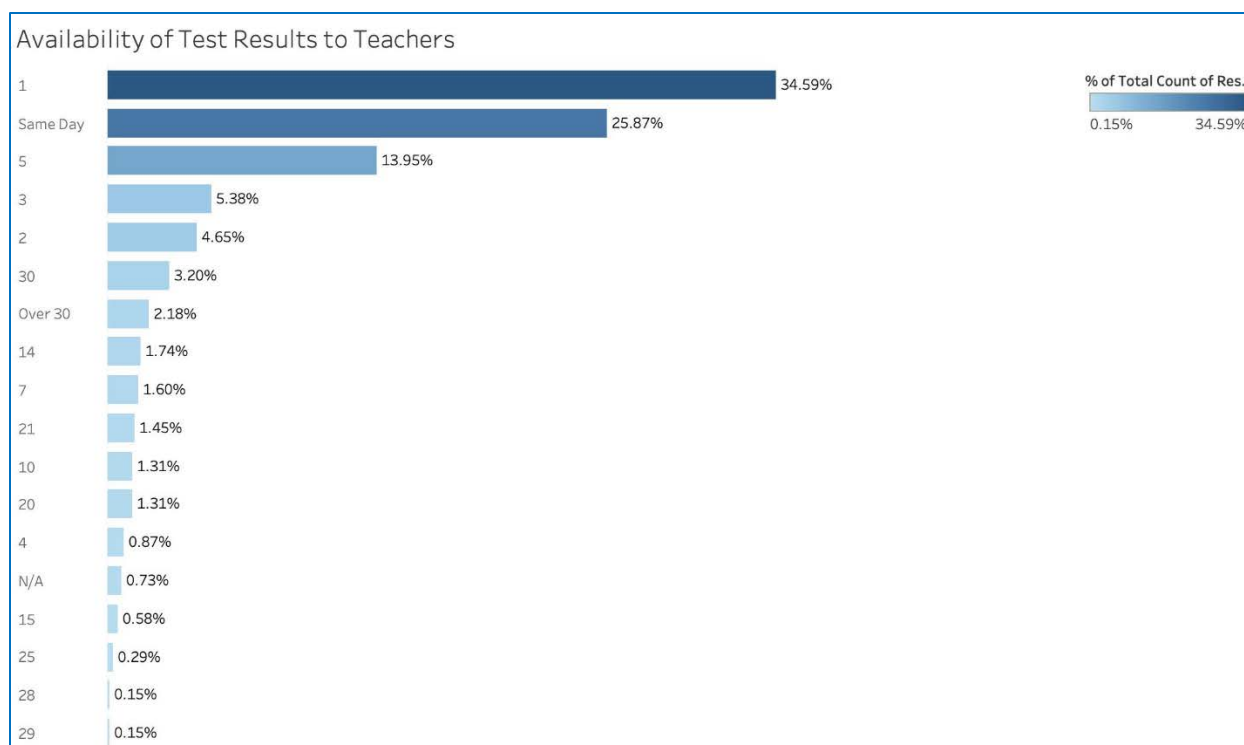


Figure 11. Availability of Assessment Results in Days for Teachers.

State Board policy TEST-001 states the following:

“(g) LEAs shall, at the beginning of each school year, provide information to students and parents or guardians advising them of the districtwide and state-mandated tests that students will be required to take during that school year. In addition, LEAs shall advise students and parents or guardians of the dates the tests will be administered and how the

results from the tests will be used. Also, information provided to parents shall include whether the State Board of Education or the local board of education requires the test(s).

- (h) LEAs shall report scores resulting from the administration of districtwide and state-mandated tests to students and parents or guardians along with available score interpretation information within thirty (30) days from generation of the score at the LEA level or receipt of the score and interpretive documentation from the NCDPI.”

Figure 12 shows the number of days by test that it takes for parents to receive their student’s score and/or interpretive documentation for local assessments. Data collected shows that 46.4% of parents receive results within five (5) days of the generation of the score. However, the data also indicates that some parents (18.6%) do not receive test results until thirty (30) or more days after the generation of the score.

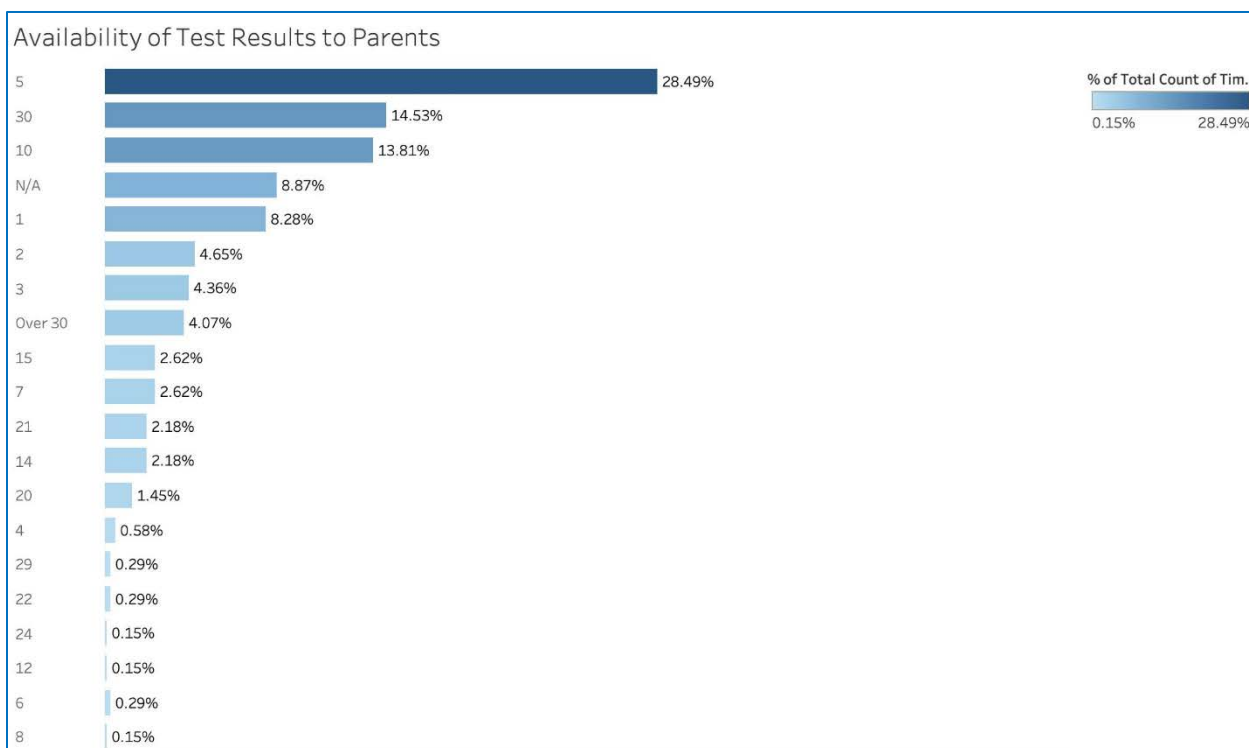


Figure 12. Availability of Assessment Results in Days for Parents

Purpose of the Test and Use of the Results

A summary of the data in Figure 13 shows that educators from the 112 LEAs use the results from local assessments most often to try to determine if students have mastered the concepts and skills covered by instruction (i.e., mastery). The type of tests teachers typically administered to determine mastery and guide future instruction are interim/benchmark and formative assessments (see Figure 1). Interim/benchmark assessments are like formative assessments in the sense that they help teachers see what students know and understand as well as topics students are having difficulty grasping.

Diagnostic assessment is a form of pre-assessment that allows teachers to determine students’ individual strengths, weaknesses, knowledge, and skills prior to instruction. Teachers typically administer diagnostics for reading and math skills, using the results to provide remedial instruction or place students within appropriately leveled classes or small groups. Some schools also diagnose concepts as a whole, aiming to reveal commonly held misconceptions in specific subjects. Results of these diagnostics inform teachers about the direction they need to take in

their instruction, meaning how early or advanced in the topic they can begin.

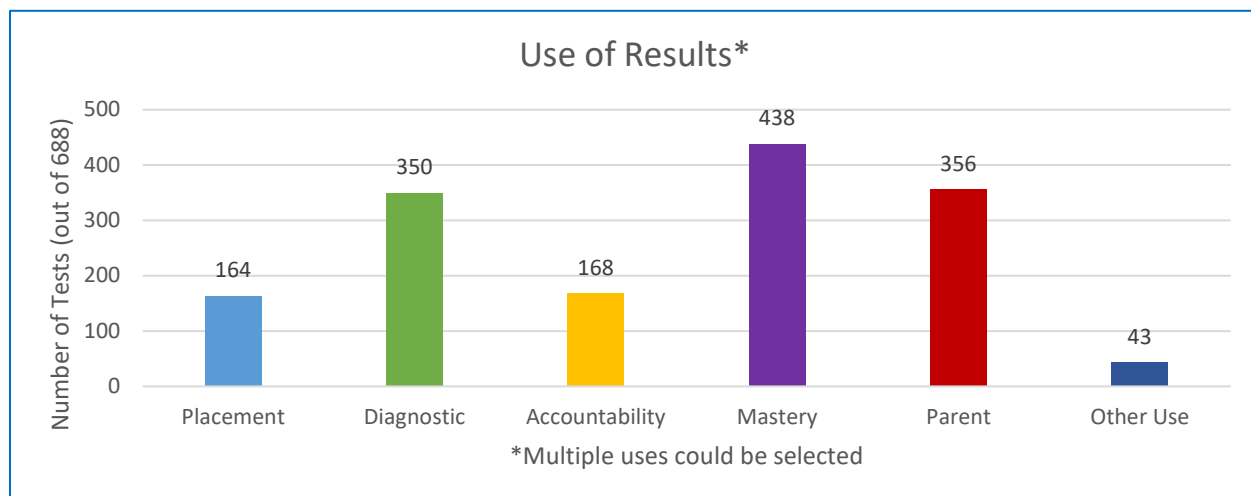


Figure 13. Use of test results.

Test Developers for Local Assessments

Local assessments are either purchased from a vendor, created by the LEA, or acquired from the State (e.g., NC Check-Ins). As shown in Figure 14, most LEAs purchase local assessments from vendors.

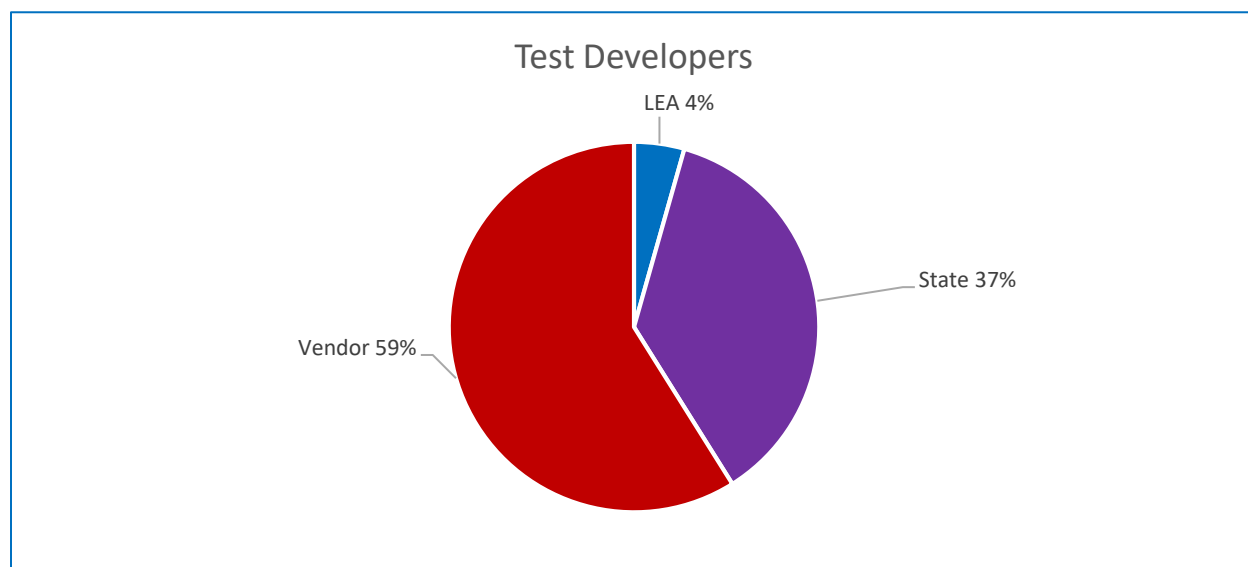


Figure 14. Test developers of local assessments.

Additional reports on the test developers for local assessments can be found under the *Test Developers* tab of the [Interactive Local Testing Report](#), found on the Accountability Services website. These reports include (1) the number and percentage of LEAs that use each vendor and (2) the count of LEAs using each vendor by test purpose (e.g., screener, benchmark, etc.).

Source of Funds Supporting Local Testing Programs

State funds appear to be the primary source of funds supporting local testing, followed by district funds. Figure 15 illustrates the breakdown of funds supporting local testing programs.

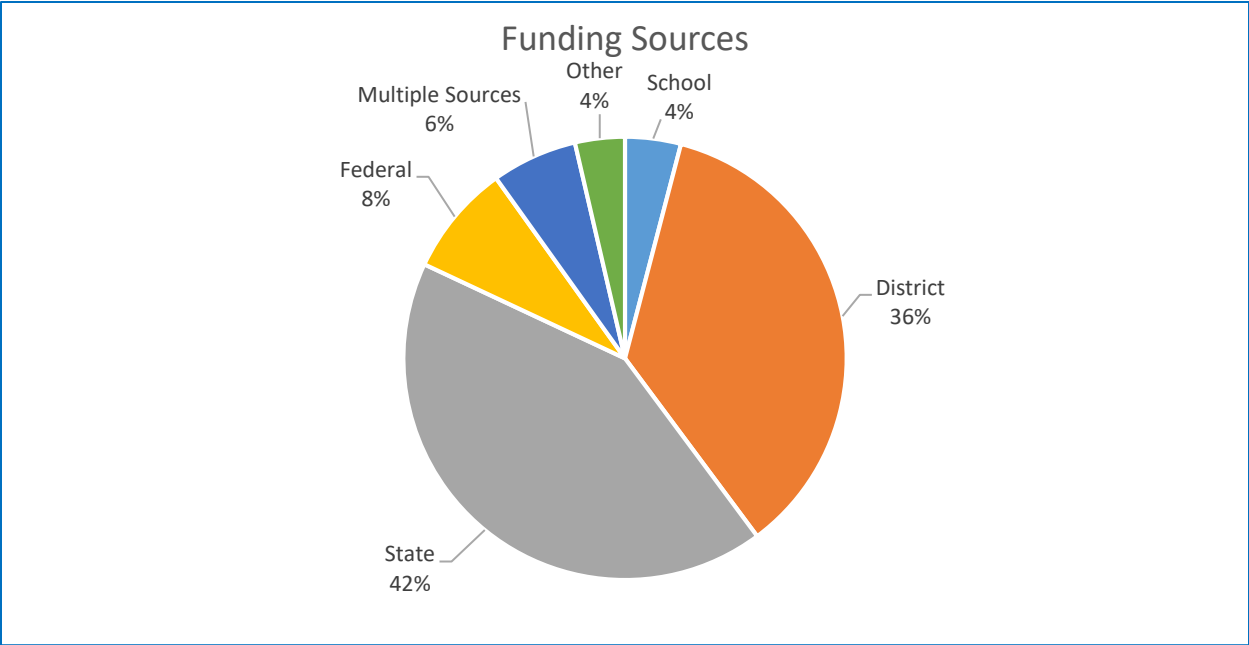


Figure 15. Source of funds supporting local testing.