

U.S. Department of Labor

Office of Inspector General—Office of Audit

**REPORT TO THE EMPLOYMENT
AND TRAINING ADMINISTRATION**



JOB CORPS SHOULD DO MORE TO PREVENT CHEATING IN HIGH SCHOOL PROGRAMS

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BRIEFLY...

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September 25, 2019

WHY OIG CONDUCTED THE AUDIT

We conducted this audit because of several allegations we received of cheating in Job Corps' high school programs.

A high school diploma greatly improves the chances of getting a job. Unemployment rates for people without high school diplomas are significantly higher than for those who have a diploma. A diploma, however, is more than just a piece of paper: it means students have acquired basic math and reading skills that enable them to better compete for jobs. Students who obtain their diplomas by cheating not only falsify their qualifications but also cheat themselves by not acquiring important skills that will help improve their economic future.

WHAT OIG DID

We conducted a performance audit to determine the following:

Was Job Corps' oversight adequate to prevent, detect, and mitigate cheating in its high school education programs?

Our work included interviewing ETA and Job Corps officials and reviewing Job Corps' policies and procedures, internal reviews, and other records related to cheating.

READ THE FULL REPORT

<http://www.oig.dol.gov/public/reports/oa/2019/26-19-001-03-370.pdf>

WHAT OIG FOUND

Job Corps' oversight was not adequate to prevent, detect, and mitigate cheating in high school education programs because Job Corps, for the most part, lacked necessary controls, as follows:

First, Job Corps implemented a set of basic preventative controls only for online, and not live, programs which represented about 40 percent of the total number of programs.

Second, Job Corps relied on infrequent, periodic internal reviews to detect cheating, and did not make use of relevant data it already had available, data which might have yielded red flags for the agency to investigate.

Third, even when Job Corps found cheating, it took, on average, two years to mitigate it. By that time, the students in question had more than likely left the program.

For these reasons, we determined Job Corps placed insufficient emphasis on developing and monitoring comprehensive controls against cheating in high school programs, because it did not believe cheating was a widespread problem. As a result, it did not have assurance that it was able to prevent, detect, and mitigate cheating.

In addition, Job Corps did not require centers to collect sufficient data on cheating and possible cheating. As a result, Job Corps took between 3 and 14 months to provide us with the bulk of information we requested on its efforts to address cheating. Most of this information should have been readily available, including, for example, the date a student enrolled in the program and the date they earned their diploma.

WHAT OIG RECOMMENDED

We issued 5 recommendations to Job Corps to establish basic preventative, detective, and mitigating controls against cheating for all high school programs.

ETA generally agreed with our results and said it plans to implement the recommendations.

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INSPECTOR GENERAL'S REPORT

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This report presents the results of our audit of Job Corps' efforts to prevent, detect, and mitigate cheating in high school education programs offered at Job Corps centers.

The Job Corps program provides academic training, including high school diplomas or equivalency certificates (collectively referred to as a "diploma"), at 127 centers and satellite campuses located nationwide and in the Commonwealth of Puerto Rico.¹ From program year (PY) 2014 through 2016, an average of about 17,000 students received a diploma through Job Corps each year.² Job Corps enrollees annually consist of more than 50,000 low-income, disadvantaged youth (i.e., those who receive public assistance and/or live below the poverty line) who face numerous barriers to employment, such as being a high school dropout or deficient in basic skills.

Job Corps' research found graduates with high school diplomas have better opportunities to get and keep good-paying jobs, as diplomas indicate they have mastered a basic set of skills needed for successful employment. According to the U.S. Bureau of Labor Statistics, people with higher levels of education consistently had lower unemployment rates than people with lower education. For example, in 2018, people with high school diplomas in the U.S had an

¹ Job Corps does not, itself, administer high school programs; rather each Job Corps center individually enters into agreements with high school program providers. These agreements may include partnerships with a local education agency, such as a high school or community college, or a contracted online high school program provider.

² Job Corps operates on a July 1 through June 30 program year.

unemployment rate of 4.1 percent, as compared to people without them who had the highest rate of unemployment (5.6 percent). Another study found incarcerated adults were only half as likely as the general population to have a high school diploma.³

Job Corps high school education programs have long been subject to allegations of cheating.⁴ From 2013 through 2018, we received over a dozen hotline complaints alleging cheating in Job Corps high school programs.⁵ The Office of Inspector General (OIG) reported concerns with center staff allowing and/or helping students cheat in its technical training programs since 2009.⁶ Prior audits found that centers had insufficient evidence (e.g., claimed training accomplishments lacked required instructor sign-offs and completion dates, completion dates coincided with holidays, weekends, and leave dates) to document that Job Corps students had actually learned needed trade skills.

Obtaining a diploma by cheating may deprive students of the skills they need to become employable and support themselves without public assistance. In response to these serious allegations, we conducted an audit to determine the following:

Was Job Corps' oversight of high school education programs adequate to prevent, detect, and mitigate cheating?

We determined Job Corps placed insufficient emphasis on developing and monitoring comprehensive controls against cheating in high school programs, because it did not believe cheating was a widespread problem. As a result, it did not have assurance that it was able to prevent, detect, and mitigate cheating.

Our audit scope generally covered PYs 2015 through 2017 to address the complaint allegations. In some instances, our analyses covered January through June 2015. Our work included interviewing ETA and Job Corps management and staff and reviewing related policies and procedures, internal reviews, and other

³ National Center for Education Statistics, U.S. Program for the International Assessment of Adult Competencies of Incarcerated Adults, 2014.

⁴ Job Corps considered cheating and plagiarism as two separate types of student misconduct. For this report, we included plagiarism and invalid diplomas (i.e., those lacking appropriate proof) in our definition of cheating.

⁵ We received 13 complaints alleging cheating in Job Corps' high school programs at seven centers from 2013 through 2018. Complaints included allegations that center staff completed coursework for students, took portions of exams for students, and allowed students to look up answers online.

⁶ DOL OIG, *Performance Audit Of Management and Training Corporation Job Corps Centers* (26-09-001-01-370, March 2009); DOL OIG, *Performance Audit of Adams and Associates, Incorporated Job Corps Centers* (26-09-003-01-370, September 2009); and DOL OIG, *Performance Audit for ResCare, Inc., Job Corps Centers* (26-10-002-01-370, March 2010)

records to identify instances of cheating. We were unable develop our own analyses of potential cheating because Job Corps took up to 6 months to provide us a useable dataset.

RESULTS

Job Corps' oversight of high school education programs was not adequate to prevent, detect, and mitigate cheating. Job Corps' oversight of cheating in its centers was inadequate because it lacked necessary controls, such as routine efforts to detect cheating. Job Corps management placed insufficient emphasis on developing and monitoring comprehensive controls against cheating in high school programs.

Moreover, Job Corps did not collect sufficient data on cheating and related issues. Thus, the agency took between 3 and 14 months to provide us the bulk of the information we requested on its efforts to prevent, detect, and mitigate cheating in high school programs, information it should have had readily available. By the time we received the data we had requested, we had substantially completed our fieldwork. Because of this lack of data, we could not develop an estimate of the extent of cheating. As a result, instead of focusing on actual instances of cheating to determine their causes, our work was limited to analyzing Job Corps' policies and procedures, its internal monitoring reports and follow-up actions, and responses to interviews and questionnaires.

JOB CORPS' OVERSIGHT OF CHEATING IN HIGH SCHOOL PROGRAMS WAS INADEQUATE

Job Corps' oversight of cheating in high school programs was inadequate because it had insufficient controls, did not know the extent of cheating in its high school programs, and its efforts to detect and mitigate cheating were both sporadic and not timely.

To its credit, Job Corps had some controls in place to prevent, detect, and mitigate cheating. These controls helped Job Corps identify and correct many instances of cheating. Job Corps claimed that less than half of one percent of all students served received a misconduct infraction for cheating during PYs 2015-2017; and therefore concluded its controls were effective. However, the weaknesses we noted throughout this report raise questions about this conclusion.

The U.S. Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government* state internal control monitoring should be ongoing and assess program performance, and that a control activity must be performed routinely and consistently. The standards further state that management must use quality information to achieve the organization's objectives, defining quality information as complete, accurate and current. These standards also recommend ongoing monitoring, which includes regular management and supervisory activities, comparison, reconciliations, and other routine actions, be built into an entity's operations and performed continually.

Basic Preventative Controls Were Missing from Job Corps' Policy and Requirements Handbook and Select Centers' SOPs

We reviewed Job Corps' Policy and Requirements Handbook (PRH) and select centers' standard operating procedures (SOPs).⁷ From those, we extracted a list of basic controls Job Corps and its centers had established, that if fully implemented could help reduce cheating (see Table 1). We also reviewed policies and practices to curb cheating suggested by the U.S. Department of Education, various academic institutions, and relevant research.

Table 1: 11 Basic Preventative Controls Job Corps Centers Should Have to Reduce Cheating in High School Programs	
From the PRH	
1.	Clear definition of cheating
2.	Communication of what constitutes cheating to students and staff
3.	Prohibition of online searches during exams
4.	Computer access limited to online exam or other authorized sites
5.	Process for handling cheating violations (including penalties, such as discharging students)
6.	Requirement that exams be taken in classrooms or academic buildings (e.g., exams should not be taken in the dormitory, at home, or after hours)
7.	Controlled and monitored exam environment (e.g., no unauthorized electronic devices or cheating materials are present and monitor present looking for suspicious behavior)
8.	Prohibition of electronic devices in exam areas
From Select Centers' SOPs	
9.	Academic honor code or code of conduct
10.	Prohibition on backpacks or book bags in exam areas
11.	Random seat assignments for exams

⁷ We obtained 95 center' SOPs and judgmentally selected and reviewed 10 for evidence of basic preventative controls.

Although Job Corps implemented most of the controls from the PRH in online high school programs, almost none of the controls we identified were present in live high school programs, a key omission. Risks for online programs were lower because of these controls. However, about 92 of Job Corps' total of 231 high school programs were considered "live,"⁸ and this lack of controls left those programs vulnerable to cheating. That said, Job Corps may not have the ability to dictate controls to some already established live programs, such as those offered by local high schools and community colleges. Nevertheless, it can require Job Corps centers wishing to offer live high school programs partner only with institutions that have cheating or similar academic integrity policies in place.

Further, Job Corps' PRH lacked some controls found in centers' SOPs, such as randomizing student seating for exams. Conversely, many Job Corps centers either had no SOPs for preventing cheating or had SOPs that were inconsistent with the PRH and each other. Of 127 Job Corps center campuses, 32 had no SOPs related to preventing cheating. Of the 10 centers' SOPs we reviewed that did mention controls for cheating, only 2 had most of the 11 controls listed above, and the remaining included only 1 or 2 of the controls.

We noted the following:

- *Job Corps' definition of cheating was limited.* While the PRH included a definition of cheating, we found Job Corps' own internal reviews expanded that definition by adding the following behaviors:
 - Claiming coursework taken outside of designated times and days (e.g., at the Ramey Center, Job Corps found students claimed they were working on courses when they were listed as being on leave);
 - Taking or receiving copies of tests without permission;
 - Taking a test for another person;
 - Sharing assignments with other students; and
 - Collaborating to change answers or cover up similarities.
- *No policies detailing disciplinary actions for cheating by non-students.* While the PRH details Job Corps' policy for discharging students found guilty of cheating, it contains no equivalent policies to address cases in which non-students, teachers and administrators, cheat or enable cheating. As explained later in this report, Job Corps' own internal reviews found several instances where center staff were involved in and enabled cheating. Job Corps acknowledged that while it can strengthen its policy to make it clear to center operators that cheating by staff must result in disciplinary actions, specific

⁸ Job Corps had a total of 139 online programs, 77 local education agency partnerships, and 15 center-accredited schools. Since centers can offer more than one type of program, these numbers do not add up to 127.

policies addressing actions for staff cheating should be handled in policies established by the centers' operators/organizations.

Job Corps Did Not Know the Extent of Cheating in High School Programs

Job Corps' efforts to detect cheating in high school programs were not ongoing, consistent, or routine. Job Corps relied on infrequent periodic reviews of its centers to detect cheating.

Job Corps' Detection Efforts Were Infrequent and Sporadic

Job Corps relies on 2 types of internal monitoring reviews to, among other things, detect cheating: Regional Office Center Assessments (ROCAs) and Data Integrity Assessments (DIAs). Job Corps conducts ROCAs and DIAs generally once every 2 years.

- ROCAs have a broad scope and evaluate a number of programmatic elements, including program outcomes; compliance with policies, laws, and regulations; and data integrity.
- DIAs have a narrower scope and focus only on whether centers accurately reported high school diplomas earned, training completions, and student leave in Job Corps' Center Information System (CIS) by sampling and testing center records (limited to 40 student files in each area).

Neither of these assessments focus specifically on cheating. We reviewed 340 internal monitoring reports and corrective actions Job Corps issued between January 1, 2015 and June 30, 2018.⁹ We found reliance on these monitoring efforts to detect cheating created significant oversight gaps for a number of reasons:

- *Monitoring was infrequent and did not cover all centers.* Conducting assessments every 2 years misses important events. The average time students stay in Job Corps is only 8 months. The infrequency of these assessments would likely result in the discovery of cheating well after students exited the program, if at all. In addition, from January 2015 through June 2018, Job Corps did not conduct 45 required monitoring reviews.

⁹ Job Corps provided ROCA reports for a number of centers 14 months after our initial data request, by which time we had substantially completed our work. As such, we did not include these in our results.

- *ROCA testing was not uniform and did not target cheating.* We found 9 ROCAs for which we could not determine whether review teams looked at any aspects of the centers' high school programs at all.¹⁰ When review teams did look at high school programs, they did not perform the same assessments – 48 did not observe the test taking process for cheating, 61 did not perform unannounced visits to observe test taking for cheating, and 14 did not check if centers were complying with preventative controls against cheating for online schools.¹¹
- *Sample sizes were small and not comprehensive.* While the DIA teams tested samples of diplomas reported by centers for problems that could indicate cheating, the sample sizes for testing were extremely small. In the 235 DIAs we reviewed, Job Corps tested an average sample of only 9 diplomas per DIA.

Additionally, the algorithm the teams used to select samples to test was not comprehensive, because it did not consider a number of basic risk factors, such as problems identified by prior monitoring or reported by complainants, that might help them better detect irregularities. Job Corps has not updated its algorithm in at least 14 years.

We identified 45 DIA assessments where the review teams found potentially invalid diplomas because of missing documentation, suspicious attendance (e.g., student was notably absent or appeared to receive a diploma after separating from the program), and various other reasons. However, instead of expanding their samples at those centers in later reviews, those teams either reduced or used the same sample sizes for the centers' next DIAs. For example, in 2015, the Hawaii/Maui Center DIA team found 6 out of 7 (86 percent) sampled diplomas were potentially invalid. Nonetheless, the next assessment in 2016 tested only 3 diplomas.

¹⁰ Job Corps provided us with 105 ROCA reports for the period of January 2015 through June 2018.

¹¹ Job Corps provided a list of 111 ROCAs it conducted from January 2015 through June 2018, indicating which controls it tested for in each ROCA.

*Job Corps Did Not Collect and Analyze
Key Information That It Could Have Used to Detect
Cheating*

We found Job Corps did not collect key information that it could have used to detect possible cheating. For example, we asked Job Corps to provide us some basic information about its high school programs, such as the names and types of program providers and the number of students who received a diploma from them. We asked for this information for calendar year (CY) 2017 in February 2018. In response, Job Corps provided us with 17,552 records that contained thousands of empty data fields.

Table 2: Initial Job Corps Data Set for CY 2017

Data Field	Blanks	Percent
Test Type	15,653	89%
Date Received	12,578	72%
Site Name	15,653	89%
Agency Name	14,477	82%
Program Name	14,477	82%
Program Type	14,477	82%
Active	14,477	82%
Start Date	12,578	72%
End Date	12,578	72%

See Table 2 for details and Exhibit 1 for a sample of the data received.

Job Corps told us it added these data fields to CIS in March 2015 in order to collect more data on its high school programs to use for analytical purposes, but never required centers to complete them. As a result, many centers did not. By not collecting this data, Job Corps had significant gaps in relevant information that could assist in identifying possible cheating patterns, as well as measuring program effectiveness. For example, if Job Corps had complete data it could determine which type of high school programs (e.g., online) students were completing too quickly, such as under 60 days, or had a higher number of cheating occurrences. Such information could help Job Corps design effective preventative controls. Job Corps will require centers to complete these data fields.

*Job Corps Did Not Routinely Use its Own Data to
Detect Potential Instances of Cheating*

Job Corps captures a wealth of student data in CIS that it could use to develop meaningful insights into the extent of cheating in high school programs. Considering many Job Corps students read at the 8th grade level and are high school dropouts, below are at least five data elements Job Corps collected that, if reviewed routinely for suspicious patterns or anomalies, would have provided helpful insights:

- Students who earned a diploma but still tested at a low grade level for basic skills;

- Students who progressed too quickly in math and reading;
- Students who earned a diploma too quickly, such as within 30 days of enrolling; or
- Students who earned a diploma despite a high number of absences.

Although none of these data elements would be conclusive evidence of cheating, each represents a red flag that would, if properly monitored, have allowed Job Corps to target its detection efforts to identify population-wide trends or anomalies and inform its prevention efforts. In fact, 3 of Job Corps' 6 regional offices, which are responsible for program oversight and monitoring, used all or some of this data to identify indicators of possible cheating, such as students earning a diploma too quickly or students earning a diploma while testing at or below the 8th grade level.

Although Job Corps claimed little to no cheating was occurring, its own internal reviews found evidence to the contrary. For example, officials at 4 of Job Corps' 6 regional offices told us they had identified no instances of cheating in the last 3 years, and 2 told us they had identified few instances of cheating. However, internal monitoring reports spanning a period of 3½ years reported instances of cheating in all 6 regions. Some examples of these follow:

- (1) *San Francisco Region, San Diego Center (2018)* – Sixteen students who received online diplomas had reading scores below the 6th grade level, which raised concerns about the integrity of the center's online high school program.

At the Sacramento Center (2017), the review team found numerous problems with the center's online high school program, such as:

- Exam passwords not safely maintained;
- Students not monitored during exams to prevent cheating; and
- Plagiarism and cheating occurring during several exams but the center failing to take appropriate disciplinary action.

Because of these and other problems, Job Corps did not renew the center operator's contract to run the center.

- (2) *Dallas Region, Tulsa Center (2015)*–The center neglected to follow any of its online high school program's rules of academic integrity and allowed students to print exams, search for the answers online, and then immediately take the exams.

- (3) *Boston Region*, Ramey Center (2015)–Seventy-nine percent of the high school program's student files Job Corps reviewed contained a multitude of data integrity issues, such as pre-signing, pre-dating, whited out changes, and crediting hours when students were absent.
- (4) *Philadelphia Region*, Potomac Center (2017)–The review team caught an instructor who was proctoring the online high school classroom telling a student to check with them when unsure how to answer questions.
- (5) *Atlanta Region*, Oconaluftee Center (2015)–The center's management and academic department allowed cheating to occur in its online high school program, as well as in other programs.
- (6) *Chicago Region*, Hubert Humphrey Center (2015)–Students were observed using cell phones and being on unauthorized websites which could be used to look up answers to assignment and test questions.

According to the reports, cheating or possible cheating occurred at 74 of the 127 centers' campuses—more than half of all centers.¹²

Job Corps Did Not Mitigate Cheating in a Timely, Consistent Way

Job Corps did not mitigate cheating in a timely way because it did not establish timeframes for implementing corrective actions. Further, its efforts were not consistent because it did not hold its offices accountable for ensuring corrections were implemented in a timely way.

Job Corps also had no centralized ability to track problems found or collaborate with and share information among offices. Despite the small number of diplomas it sampled and tested (as noted earlier), Job Corps allowed problems it identified to remain uncorrected, thus reducing the effectiveness of its overall efforts. Specifically, we found the following:

- Job Corps took, on average, 826 days (over 2 years), to deal with diplomas it deemed invalid. For example, a January 2015 DIA found the Collbran Center reported it granted diplomas that were invalid. Job Corps resolved the invalid diplomas in August 2018, 1,308 days (over 3 years) later.
- Sixty-seven invalid diplomas remained open, on average, for 857 days (over 2 years) because Job Corps did not remove the credits claimed by centers for overstated achievements and assess/collect liquidated damages.

¹² Included in the 74 were 3 centers since closed and one satellite location.

- Corrective action plans for 8 of 23 (35 percent) center assessments did not address or only partially addressed identified cheating concerns.

As noted, Job Corps did not place sufficient management emphasis on mitigating these matters. By relying on infrequent periodic reviews that seldom focused on identifying cheating, Job Corps did not have timely and accurate information about the extent of cheating to respond appropriately. Further, the lack of established timeframes for correcting cheating issues it found, accountability, and a centralized system to routinely monitor the progress—or lack of—corrective actions prevented Job Corps from correcting specific issues, as well as determining whether the issues were isolated or systemic (i.e., occurring elsewhere). These deficiencies also allowed known instances of cheating to continue unresolved for years.

In February 2019, during the course of the audit, Job Corps issued new SOPs and guidance establishing timeframes for issuing ROCA reports and providing corrective action responses. However, it did not provide timeframes for reviewing, approving, and implementing corrective actions.

THE EFFECTIVENESS OF JOB CORPS' ACTIONS TO PREVENT, DETECT, AND MITIGATE CHEATING COULD NOT BE DETERMINED

It was not possible to assess the effectiveness of Job Corps' actions to detect, prevent, and mitigate cheating in high school programs because Job Corps did not collect or analyze sufficient information. We had to rely on the limited information we were able to glean from Job Corps' monitoring efforts to assess the extent to which cheating and related issues occurred and the corresponding effectiveness of Job Corps' efforts to prevent, detect, and mitigate cheating. Despite repeated requests, Job Corps was unable to provide us with information in a timely manner, and took as long as 14 months to provide us basic program information we requested, by which time we had substantially completed our work using alternative, but significantly more limited, sources of information.

Throughout the audit, we repeatedly encountered months-long delays receiving information necessary for us to conduct our audit. According to the *Standards for Internal Control in the Federal Government*, the information we requested should have been maintained and readily available for examination. Further, the standards state management should use quality information (i.e., "complete, accurate and current") to achieve its objectives and address risks. Despite this,

we experienced significant delays, even with information that should have been readily available. For example:

- Job Corps took more than 14 months to provide monitoring reports for at least 15 centers.
- Job Corps took up to 7 months to provide us the status of cheating-related issues identified by its own monitoring efforts.
- Job Corps took 6 months to provide us a listing of students who received diplomas during PYs 2015-2017. We requested basic student information, such as:
 - o Date enrolled
 - o Date diploma earned
 - o Initial and final basic skills test scores¹³

Job Corps provided us an initial data set; however, this set was both incomplete and inaccurate, and contained tens of thousands of empty data fields. See Table 2 on page 8 for details.

- Job Corps took 4 months to provide us center SOPs relating to cheating.
- Job Corps took 3 months to respond to routine audit questions, such as the average length of time it took a student to attain a diploma during PYs 2015-2017.

This information should have been either readily available to Job Corps or relatively quick to produce. A listing of students who obtained a diploma is basic information that should have been at Job Corps' electronic fingertips; SOPs can be copied or e-mailed within days; and answers to routine audit questions should not take months.

The inexplicably long time it took Job Corps to provide us information, along with the significant gaps in the first data set it provided (detailed in Table 2 on page 8), adds to our concerns about Job Corps' oversight. Without basic quality information, a program cannot measure its performance or the extent to which it is achieving its objectives.

As a result, we could not perform procedures that could have provided us a view of the extent of the cheating issues. For example, the student data would have

¹³ Job Corps centers administer Tests of Adult Basic Education (TABE) to students to determine their grade level equivalent (e.g., 8th grade) by gaging their proficiency in math and reading skills.

allowed us to correlate student basic skills entrance and exit scores, information useful to identify trends in the population. This lack of data severely limited the work we could do.

OIG'S RECOMMENDATIONS

We recommend the Assistant Secretary for Employment and Training require Job Corps:

1. Establish basic preventative controls for cheating for all high school programs operated by centers.
2. Ensure centers partner only with those school providers with established cheating or academic integrity policies that include basic preventative controls.
3. Ensure reviews of high school programs are ongoing, consistent, and routine and, at a minimum, cover key controls to detect cheating.
4. Regularly collect and analyze center-wide data for unusual trends or outcomes to detect cheating.
5. Develop a centralized process to ensure deficiencies are timely mitigated and address their root causes.

SUMMARY OF ETA'S RESPONSE

The Assistant Secretary for Employment and Training generally agreed with our results and said ETA plans to implement the recommendations. ETA's written response to our draft report is included in its entirety in Appendix B.

We appreciate the cooperation and courtesies ETA extended us during this audit. OIG personnel who made major contributions to this report are listed in Appendix C.



Elliot P. Lewis
Assistant Inspector General for Audit

EXHIBIT 1: EXCERPT OF INITIAL JOB CORPS' DATA SET FOR CY2017

As part of our audit, we asked Job Corps for some basic information about its high school programs, such as the names and types of program providers and the number of students who received a diploma from them. In response, Job Corps provided a dataset of 17,552 records that contained thousands of empty data fields. Exhibit 1 below shows a sample of the data Job Corps provided.

Region Name	Student Enrollment Date	Student Separation Date	HSE Test Type	HS Status	Date Received	Site Name	Agency Name	Program Name	Program Type	Active	Start Date	End Date
Atlanta	3/21/2017	10/11/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Atlanta	10/18/2016	5/17/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Atlanta	5/10/2016	8/17/2016	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Atlanta	8/2/2016	8/17/2016	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Atlanta	8/2/2016	4/21/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Boston	8/16/2016	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Boston	9/6/2016	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Boston	3/21/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Boston	11/1/2016	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Boston	1/25/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Chicago	10/11/2016	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Chicago	2/14/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]

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Region Name	Student Enrollment Date	Student Separation Date	HSE Test Type	HS Status	Date Received	Site Name	Agency Name	Program Name	Program Type	Active	Start Date	End Date
Chicago	1/10/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Chicago	3/7/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Chicago	8/22/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Dallas	3/21/2016	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Dallas	4/25/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Dallas	5/9/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Dallas	9/20/2016	9/5/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Dallas	11/29/2016	5/23/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Philadelphia	5/30/2017	[NULL]	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Philadelphia	5/24/2016	10/1/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Philadelphia	9/13/2016	6/23/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Philadelphia	9/20/2016	6/14/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
Philadelphia	11/29/2016	2/12/2018	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
San Francisco	5/31/2016	11/17/2017	[NULL]	HSD Graduate	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]	[NULL]
San Francisco	6/12/2017	[NULL]	GED 2014	HSE Certificate Awarded	10/5/2017	University of Alaska - Anchorage	[NULL]	[NULL]	[NULL]	[NULL]	7/24/2017	10/5/2017
San Francisco	7/24/2017	[NULL]	GED 2014	HSE Certificate Awarded	10/26/2017	University of Alaska - Anchorage	[NULL]	[NULL]	[NULL]	[NULL]	8/28/2017	10/26/2017
San Francisco	11/28/2016	5/26/2017	GED 2014	HSE Certificate Awarded	3/22/2017	University of Alaska - Anchorage	[NULL]	[NULL]	[NULL]	[NULL]	1/23/2017	3/22/2017

APPENDIX A: SCOPE, METHODOLOGY, & CRITERIA

SCOPE

Our audit scope generally covered PYs 2015 through 2017 spanning July 1, 2015 through June 30, 2018 to address numerous hotline complaint allegations. In some instances, our analyses included January 1, 2015 through June 30, 2015.

METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

To address our audit objective, we reviewed all related complaint allegations reported through the OIG's hotline. During the course of the audit, Job Corps was unable to timely provide us sufficient data and information documenting its efforts to prevent, detect, and mitigate cheating in its high school programs. Job Corps took up to 14 months to provide us basic information we requested, by which time we had substantially completed our fieldwork. As a result, our work was mostly limited to interviewing ETA and Job Corps' management and staff in Washington, DC and via teleconference and analyzing Job Corps' policies and procedures, internal monitoring reports and follow-up actions, and responses to interviews of and questionnaires completed by ETA and Job Corps management and staff.

Data Reliability

Job Corps provided two data sets in response to our request for basic student information, such as enrollment dates and test scores. The first set contained thousands of empty data fields and was not useable. Job Corps took 6 months to produce the second set. By this time, we had substantially completed our audit work. As a result, other than calculating the number of empty fields and the length of time Job Corps took to provide it, we did not rely on these computer-processed data sets to form any conclusions, findings, or recommendations in this report. Therefore, we did not assess the reliability and completeness of this data.

The conclusions, findings, and recommendations in this report were formed using information from Job Corps' policies and procedures, internal monitoring reports and follow-up actions, and responses to interviews and questionnaires.

Internal Controls

In planning and performing our audit, we considered Job Corps' internal controls relevant to our audit objective. We obtained an understanding of Job Corps' internal controls, and assessed the internal control risks relevant to our audit objective. We considered the internal control elements of control environment, risk assessment, control activities, information and communication, and monitoring during our planning and substantive phases and evaluated relevant controls.

Basic Key Controls for High School Programs

We reviewed Job Corps' PRH, a judgmental sample of 10 centers' SOPs, and policies and practices to curb cheating suggested by the U.S. Department of Education, various academic institutions, and relevant research. The information we obtained provided us with a reasonable understanding to extract a list of basic controls that could help reduce cheating. See Page 4 of the report.

Center Standard Operating Procedures

Job Corps provided 92 centers' SOPs related to the prevention of cheating in high school programs for PYs 2015 - 2017. We judgmentally selected and reviewed 10 centers' SOPs for evidence of the basic key controls, mentioned above.

Internal Monitoring Reports

We requested and reviewed 340 internal monitoring reports and the related corrective actions to determine the extent Job Corps identified cheating and related issues and the sufficiency of Job Corps' corrective actions taken in response.

Regional Office Center Assessments

We requested all ROCA reports for the period January 1, 2015 through June 30, 2018. Job Corps provided 105 ROCA reports and we reviewed each report to determine if Job Corps identified cheating or indications of possible cheating occurring in high school programs. Examples include:

Cheating

- Non-students or staff providing answers to students during an exam
- Students using online resources during a test
- Students taking exams outside of designated times and days

Indications of Possible Cheating

- Quick completion of high school program, such as 4 days
- Examinations taken in an uncontrolled environment, such as students are allowed to walk in and out of classroom

For ROCA reports that identified cheating or indications of possible cheating, we requested the related corrective action plans. Job Corps provided 23 corrective actions plans that we reviewed to determine if the corrective actions addressed, partially addressed, or did not address the cheating concern(s) or related issues identified.

Data Integrity Assessments

We requested all DIA reports for the period January 1, 2015 through June 30, 2018. Job Corps provided 235 DIA report excerpts and we reviewed each one to determine the total number of sampled diplomas and the total number of potentially invalid diplomas Job Corps identified.

For the potentially invalid diplomas, we requested Job Corps' final determination, valid or invalid. For each diploma that Job Corps determined to be invalid, we requested and reviewed supporting documentation and determined if the invalid diploma was resolved and the timeliness of the resolution.

CRITERIA

We used the following criteria to perform this audit:

- Government Audit Standards (GAO-12-331G, December 2011)
- Standards for Internal Control in the Federal Government (GAO-14-704G, September 2014)
- Assessing the Reliability of Computer-Processed Data (GAO-09-680G, July 2009)
- Job Corps' Policy and Requirements Handbook (July 2017)
- Job Corps' Program Assessment Guide (July 2014)

APPENDIX B: ETA'S RESPONSE TO THE REPORT

U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210



SEP 24 2019

MEMORANDUM FOR: ELLIOT P. LEWIS
Assistant Inspector General for Audit

FROM: JOHN PALLASCH

SUBJECT: Response to Office of Inspector General Draft Audit Report No.
26-19-001-03-370 – *Job Corps Should Do More to Prevent
Cheating in High School Programs*

Thank you for the opportunity to review the subject draft audit report and provide a response to the recommendations. As noted in your draft audit report, a high school diploma (HSD) significantly improves an individual's chances of getting and keeping a job. The Employment and Training Administration (ETA) agrees with the Office of Inspector General's (OIG) observation that obtaining a diploma by cheating is not only wrong, but also can deprive a student of the skills needed to become employable.

The HSD and high school equivalency (HSE) programs provided by Job Corps center operators are typically delivered by contracts with online program providers and/or through Memoranda of Understanding (MOUs) with 77 different local education agencies. A small number of Job Corps centers (15) operate their own high school programs. Job Corps, as the OIG acknowledged in its report, has existing controls in place to prevent, detect, and mitigate cheating. In the past, Job Corps has promoted program integrity and accountability in the area of HSD/HSE through policy changes. For example, on June 17, 2013, through *Job Corps Policy and Requirements Handbook* (PRH) Change Notice No. 12-19, Job Corps added a new requirement that HSE tests taken at test sites on Job Corps centers be given by a third-party test administrator from a local educational or community institution (e.g., community college or local school district). Tests must not be administered by an employee of the Job Corps center. On January 20, 2015, through Job Corps PRH Change Notice No. 14-10, Job Corps added requirements for online HSD programs (PRH 3.11, R5) and added infractions to the student conduct system relating to plagiarism and cheating (Exhibit 3-1).

The OIG's draft audit report reminds ETA that we must remain vigilant and that Job Corps must use additional cheating deterrent, detection, and mitigation methods at its 123 Job Corps centers across the United States. As a result, Job Corps plans to incorporate language in the Job Corps PRH, as appropriate, highlighting the importance of having HSD/HSE third-party providers document their cheating-related controls. Job Corps centers will be required to consider the strength of these controls before entering into contracts and other agreements with these providers. Center operators will be encouraged to establish personnel policies and procedures that clearly inform staff that cheating allegations will be promptly investigated and disciplinary action taken against any staff member that the operator determines aided, allowed, or ignored cheating. Job Corps will also review existing administrative data, its risk management system, and assessment tools to develop ways to identify anomalies, trends, and risks related to the

HSD/HSE programs at centers and, as needed, initiate on-site targeted assessments to determine whether a compliance issue exists. In addition, Job Corps will provide center staff with training on their obligation to report cheating and the reporting process.

ETA appreciates the feedback provided in the OIG's draft audit report and plans to review and implement the recommendations in a manner that is most effective within the program. Each of the recommendations, followed by ETA's response, are below.

OIG Recommendation 1: Establish basic preventative controls for cheating for all high school programs operated by centers.

ETA Response: ETA agrees that all HSD and HSE programs made available through Job Corps should have internal controls to detect and prevent cheating. That said, most Job Corps centers do not operate high school programs. The vast majority of students enrolled in Job Corps' high school programs obtain an HSD or HSE through an online program or participate in a program that a Job Corps center operator makes available through a contract and/or MOU with an HSD or HSE provider, such as a local public or charter school.

As acknowledged in Table 1 of the OIG's draft audit report, some preventative controls are already in place to detect and mitigate student cheating in Job Corps' online high school program. In addition, Job Corps will review controls outlined in operating plans and standard operating procedures created by Job Corps centers, as well as controls suggested by the U.S. Department of Education on reducing cheating, to identify additional controls that may help prevent and detect cheating in online and center-operated HSD and HSE programs. As noted in the draft audit report, the OIG acknowledges that Job Corps may have limited authority to require controls to be incorporated into established third-party high school programs, such as those offered by local public or charter school providers.

To support center operators with promptly reporting possible incidents of staff-related cheating, Job Corps will review and revise its policies as needed. Training provided by Job Corps will inform center staff of their obligation to report cheating and the process for reporting alleged staff and student cheating to Job Corps. As with many staff-misconduct incidents, the contract center operator should address how it handles conduct and policy violations in the operator's personnel policies and practices. Job Corps will take measures to encourage center operators to communicate the program's expectation related to cheating and establish policies and procedures that clearly state allegations of cheating by staff will be promptly investigated, and disciplinary action will be taken against any staff member who the operator determines aided, allowed, or ignored cheating.

OIG Recommendation 2: Ensure centers partner only with those school providers with established cheating or academic integrity policies that include basic preventative controls.

ETA Response: ETA agrees with this recommendation. As previously mentioned, a center's relationship with a third-party provider may be contractual or by agreement reflected in an MOU. The Job Corps PRH, as appropriate, should include language highlighting the importance of having HSD/HSE third-party providers document their controls related to preventing and

detecting cheating by staff and students. Job Corps centers must consider the strength of these controls before entering into contracts and other agreements with these providers.

OIG Recommendation 3: Ensure reviews of high school programs are ongoing, consistent, and routine and, at a minimum, cover key controls to detect cheating.

ETA Response: ETA agrees with this recommendation. Job Corps will review existing administrative data, its risk-management system, and its assessment tools to develop ways to identify anomalies, trends, and risks related to the HSD/HSE programs at centers. Where Job Corps identifies a significant risk or anomaly, regional offices may initiate a Regional Office Targeted Assessment (ROTA) to determine whether a compliance issue exists. Regional offices will also continue to review the HSD and HSE components during their scheduled Regional Office Center Assessments (ROCA).

OIG Recommendation 4: Regularly collect and analyze center-wide data for unusual trends or outcomes to detect cheating.

ETA Response: ETA agrees with this recommendation and will use the action described in the response to the previous recommendation to achieve the needed results. This may also include creating a dashboard or monthly reporting structure.

OIG Recommendation 5: Develop a centralized process to ensure deficiencies are timely mitigated and address their root cause.

ETA Response: ETA agrees with this recommendation and will use the action described in the responses to OIG Recommendations 3 and 4 to achieve the needed results. This may also include using the current ROTA and ROCA tracking and monitoring tools to manage contractor implementation of corrective actions to address HSD/HSE deficiencies identified during these assessments.

APPENDIX C: ACKNOWLEDGEMENTS

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