

Greg,

After going through the review process of the for-profit schools testimony, I identified what I believe are some systemic issues that resulted in the need for corrections in certain areas. Overall I feel the message delivered by our testimony, video clips, and your oral statement was accurate, and did not in any way misrepresent the facts of our investigation. The team did an excellent job of executing the work and crafting a clear, concise, and accurate message. However, due to the short time frames and other systemic issues, the details included in some bullets and roll up of overall numbers was not 100 percent accurate. Finally, it is clear that the risk adverse nature of parts of OGC resulted in exaggerations of alleged inaccuracies.

First, given the short time frames of the job and volume of undercover work performed, this engagement was at a higher risk from its initiation. This is not necessarily a systemic issue, but will likely be a problem we face again in the future. Because staff were forced to do write ups of tests on the road while preparing for the next test, some of the written summaries of test were not 100 percent accurate. That error was compounded by the limited time that [Redacted] and I had to review documents. I take responsibility for not listening to all 60 hours of audio and checking those files with what was summarized in write ups. [Redacted] and I both ensured GAO standard practices were followed by reviewing the summaries, but did not take full advantage of source audio/and video files in order to ensure accuracy. In the future, FSI must ensure that all statement in summaries are traced back to source audio & video files.

Second, the team's unwillingness to say no to additional insertion of details at the end of a job created several of our most obvious inaccuracies. This is a systemic problem caused internally within FSI by our appetite for specific details on every area, and caused externally by stakeholders, QCI, and congressional staffers. The bottom line in this area is that we must stand firm when asked to insert new facts, summarize tests that are not all the same, or do additional research at the end of a job. We cannot come up with additional details at the last minute without sacrificing some level of quality or timeliness. Specifically, at the end of this job, we were asked to throw in summary level numbers for graduation rate questions and accreditation questions. While all tests were designed to attempt to get answers to these questions, we all understood that the nature of undercover work would not ensure that 100 percent of the tests addressed each specific area. However, because a summary of X of 15 schools was requested, we then went back and stretched whatever we could find to come up with a number for the testimony. This was done in haste and is where most of our corrections come from. To prevent this in the future, we must educate ourselves and external stakeholders that we cannot insert an infinite amount of new detail without adding additional time to a job.

Third, the team's referencing process and the staff involved do an excellent job of ensuring the overall message is accurate, but can, in rare cases, overlook some factual inaccuracies. I feel that [Redacted] and other referencers within the team do an excellent job, but realize now more than ever, that small details within a report filled with specific facts, can sometime make it thorough referencing without being accurate. This is a systemic problem, and must be addressed

internally. In order to fix this issue, I think FSI management, including all the AD's, must set a new tone that referencing is not an afterthought. Too often we cram referencing into a very compressed schedule and pressure our referencers to complete the task under short time frames. This is a result of our general desire to complete work as quickly as possible and respond to short turnaround requests. On the for-profit schools job, some statements that made it into the report were not supported in written documents, but were not caught during referencing. I hope, given more time and emphasis, this type of error will not occur again.

Finally, an issue unrelated to relevant concerns of OGC is the conduct of FSI staff during undercover testing. In several instances, FSI staff made comments while being recorded about their assessment of a test, and in at least one case made off color jokes while waiting for the tests to continue. I have spoke with **Redacted** about this subject during our development of roles and responsibilities guidance for the team. Both of us agree that our staff, both agent and audit/analyst, are capable of performing undercover tests. However, we feel that all staff should receive some level of training on the "dos and don'ts" of undercover work. Because some staff have never performed undercover work before, or have not been trained in the area for years, we must train staff so they know what is required of them during these tests.

In summary, the for-profit schools job was in some ways an anomaly due to its extreme short time frames, but in other ways was similar to most FSI jobs. In the end, the products produced were accurate on a macro level and accurately portrayed the results of our tests. However, if FSI wants to continue to produce products with numerous small details inserted late in the process, we will have to extend our job timelines. If, as with the for-profit schools job, timeframes are not flexible, we have to understand that there will be some unavoidable risks.

GAO employee names redacted by HELP Committee for privacy reasons