



Department  
of Education

John R. Kasich, Governor  
Michael L. Sawyers, Acting Superintendent of Public Instruction

OFFICE OF  
INSPECTOR GENERAL  
2013 MAR 25 AM 11:50

March 20, 2013

Randall J. Meyer, Inspector General  
30 East Broad Street  
Suite 2940  
Columbus, OH 43215-3414

Dear Inspector General Meyer:

This letter is a response to your office's December 20, 2012 letter to Acting Superintendent Michael Sawyers which contained a copy of your office's report of investigation into the conduct of former Ohio Department of Education (ODE) employee, Kathleen Garner.

Your letter requested ODE respond to the list of recommendations contained at the end of the report within sixty days. On January 28, 2013 your office granted my request for an extension to reply until March 20, 2013. Please find ODE's responses in the attached memo.

Should you have any questions or concerns regarding ODE's responses, please do not hesitate to contact me.

Sincerely,

P.R. Casey IV  
Chief Legal Counsel

Cc: James Manken  
Chief Legal Counsel

Enclosures

OHIO DEPARTMENT OF EDUCATION RESPONSES TO OIG RECOMMENDATIONS ON  
KATHLEEN GARNER INVESTIGATION

OIG Rec. #1: Consider making changes to the GED system to allow for a secondary verification and approval of information entered by another employee.

- Based on the implementation of computer based testing in January 2014, upgrades to the current GED system would not be cost effective. Once the computer based testing is implemented, data entry of test scores (Official Transcripts) will be handled by a third party yet to be established.
- We have established a policy of secondary verification and approval for all tests scores (transcripts) entered into the current GED system.
- The Assistant Director/GED State Administrator will meet with ITO to outline the guidelines for a daily report to monitor the entry of test scores (Official Transcripts).
- The target date of completion for the system to run the daily report is April 30, 2013.
- The program will generate a report indicating if a staff member has taken more than one action on a record within 12 months preceding the current action. The report will include the name, SSN# of the individual, the action taken and the corresponding comment by the staff member.
- The Assistant Director/GED State Administrator will check the report daily to determine if any anomalies occurred and if a more in-depth review is warranted.

OIG Rec. #2: Consider making changes to the web-based system to allow for a scanned copy of the out-of-state transcripts to be included as an attachment. If this is not feasible, consider keeping scanned copies of transcripts stored in another system before they are destroyed.

- Based on the implementation of computer based testing in January 2014, upgrades to the current GED system would not be cost effective. Once the computer based testing is implemented, data entry of test scores (Official Transcripts) will be handled by a third party yet to be established.
- Once the tests scores (out-of-state transcripts) are entered and verified they are kept in files within the office.
- Currently, we are working with the Office of Chief Legal Counsel to establish a Records Retention Policy for these and other records held in the office.

OIG Rec. #3: Consider adding a field in the SAFE account to indicate which state the transcript was received from when ODE employees are entering information received in the mail or via fax. This should include the testing location if known.

- Based on the implementation of computer based testing in January 2014, upgrades to the current GED system would not be cost effective.
- SAFE accounts are required before an applicant can: enter an application to take a test, take the actual test, or request an official transcript or a duplicate diploma. Once the applicant has created the SAFE account, they can then enter their record within the GED system.
- The Assistant Director/GED State Administrator will work with ITO to add additional fields to the GED system to include how the test scores (Official Transcript) were received and from which state they were received. The office is working on a target date, but it has not been established at this time because planning and discussions must occur. Part of the planning includes evaluating the ITO personnel resources that will be available to complete this work.
- A protocol has been established in the short term until the work with ITO can be completed. The protocol established provides direction for entering comments by each staff member regarding test scores (out-of-state transcripts). The following information will be documented in the Comment section:
  - Source (Fax/Official Transcripts)
  - State
  - Test score total/average
- The Assistant Director/GED State Administrator will conduct a weekly random audit of test scores (Official Transcripts) entered to verify compliance with established protocol.

OIG Rec. #4: Make changes to their policies and procedures prohibiting employees from entering information for relatives.

- A policy has been established to address entering information for a staff member's relative. No staff member is permitted to enter a relative's information. The information is to be forwarded to the Assistant Director/GED State Administrator.
- Each staff member will sign-off on the policy no later than March 30, 2013.

OIG Rec. #5: Notify the appropriate individuals regarding the questionable GEDs and ensure the individuals are unable to receive a transcript in the future related to the scores inserted by Garner. If the individual takes and passes the test in the future, they should be allowed access to that transcript.

- The SAFE accounts for the individuals Garner entered false data for have been disabled.
- We are in the process of sending certified letters to the people holding invalid GEDs to inform them they should not be used.
- The target date for finalizing an action plan if an issue arises from the data entered is April 30, 2013.