



## RULES AND SIGNALS TESTS

December 22, 2016

CASE OIG-I-2016-509

In August 2015, we received a complaint of “widespread” cheating on the federally mandated rules and signals tests that are required of all train engineers, conductors, and assistant conductors. Our investigation did not find any actionable evidence of widespread cheating on the company’s rules and signals tests.

However, we found internal control deficiencies with the company’s rules and signals tests. These deficiencies call into question whether the program is vulnerable to cheating, including the possibility that cheating could occur without detection. Based on our findings, we raised four observations with the company to consider in order to improve the testing practices and procedures. Specifically, we noted: (1) a lack of a company-wide policy setting forth clear management controls for the testing program; (2) test-taking software that permits employees to retake tests without locking them out, even though they are prohibited from retaking the same test on the same day; (3) a small number of employees in active service without a record of passing any tests; and (4) inconsistencies with the company’s organizational manual on who can administer tests.

The company responded to our investigative report and addressed all of the concerns we identified. First, the company drafted a more detailed testing policy that included specific instructions and protocols for the instructors administering the tests. Second, the company indicated they are correcting the testing software issue to ensure that test-takers are prohibited from retaking the same test on the same day. Third, the company corrected testing records that had been incorrectly recorded. Finally, the company confirmed that all of the proctors that administered the test were authorized, stating that the identified inconsistencies were caused by user error when entering employee identification numbers.