

The Educator Fraud Prism and Implications for Teacher Preparation

Tonya J. Foust Mead, Office of the State Superintendent of Education, USA

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Abstract

States have been under intense pressure to develop initiatives to detect, deter and investigate educator fraud in response to cries of orchestrated educator cheating on statewide assessments. (Bello, Marislo, & Toppol, 2011). Political leaders appear to be less responsive. Current trends however, indicate a societal push for more stringent consequences of educator white collar crime and corruption. In 2012, a former El Paso district superintendent was sentenced to four years imprisonment \$56,600 in fines, and \$180,000 in restitution for contract fraud and data manipulations. While in Columbus City Schools, the state's auditor found that the district superintendent had presided over a culture of data manipulation that involved changing grades, deleting absences and falsifying the number of dropouts. The Federal Bureau of Investigation joined the case in 2012 in search of possible fraud and misappropriation of federal funds.

These convictions resulting in imprisonment sent shock waves that reverberated throughout the educational community. Teacher certification programs to prepare and warn educators are inadequate for this new landscape.

Keywords: educator fraud, assessment, teacher preparation, test security, fraud prism, fraud triangle, misconduct, corruption, white collar crime, fraud diamond, ethics

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Introduction

Teacher preparation programs are ill-equipped to prepare future educators for the sea of change. A review of the literature illustrates the numerous societal factors associated with increased occurrences for educator fraud. Even so, criminologists have yet to create a model to explain this phenomenon. The primary purpose of this presentation is present a new paradigm called the *Educator Fraud Prism*[™] to explain educator fraud, its causes and deterrence to better prepare educator and faculty candidates.

Macroscopic Perspectives of Educator Fraud

Attitudes about Cheating: The Scientific American Mind (2013) posed the question, “Why we Cheat?” and provided a possible rationale that “Everybody does it.” Explanations from microbiologists Fang and Casadevall (2013, p. 30-31) ranged from larger neocortex to cheating helps maintain competitiveness.

Misdemeanor Reform: Even when allegations of educator crime are escalated to the level of the criminal court system, the National Association of Criminal Defense Lawyers (April 2009) recommended a diversion of misdemeanors with little impact upon public safety to lesser penalties (Pew Center, March 2009).

Public’s Perception of Educators: In 2013, Gallup conducted a random sample poll of 1,031 adults to determine the public’s perception of honesty and ethical integrity across professions. Seventy percent of the respondents, when asked to rate the ethical standards of people in different fields using a 5 point Likert scale, rated nurses at the top of the list. Tying in second place were grade school educators and pharmacists.

The high esteem in which the public holds of educators, particularly grade school teachers, run counter to the sector’s placement as the fifth highest industry for reported fraud. Factors that play a role in educator fraud and white collar crime follow.

Microscopic Perspective of Educator Fraud

Poor Economy: Enforcement experts find that increased financial pressures such as personal debts, declining home values, stagnant salaries, and dropping stock prices increase the risk for fraud (ACFE, 2012, 2014). For two years, the education industry has ranked fifth in the top 10 list (ibid).

Secondary Level Education Reform: Increased educator fraud is associated with “high stakes testing” (Kaufman, 2012, p. 1) which occurs when student standardized test scores are factors for teacher and school evaluations. Penalties and rewards are obtained using these indices. Kaufmann (2012) says such practices may have “spurred change, although not in unambiguously positive ways” (p.1).

Variability of Teacher Preparation Program Curricula: There is considerable range of curricula lacking consistency within programs and across settings. Seventy-one percent of newly hired employees entering the teaching profession are prepared at traditional institutions of higher learning, 21 percent receiving their training in

traditional institutions in a non-traditional setting, while 8 percent are prepared in alternative programs located at non-traditional institutions (US Department of Education, 2011).

“Unlike the curriculum of other professions which has some coherence of substance and pedagogy, the teacher education curriculum is widely distributed by rarely coordinated. Many of those who teach teachers do not think of themselves as teacher educators.... And most have little preparation for the task of educating teachers” (Darling-Hammond & Ball, 1997, p. 12).

Randi Weingarten, president of American Federation of Teachers (AFT), a union representing 1 million members, after an address hosted by the American Enterprise Institute responded to an attendee's question indicating preference for a teacher residency program, similar to the practice found in the medical and counseling profession (Weingarten, June 18, 2014).

Lack of Ethics Course work in Teacher Preparation Programs: In 2013, the Association of American Colleges and Universities surveyed 318 employers to identify the skills in demand when hiring. Employers placed the greatest priority on ethics, intercultural skills, and capacity for professional development. Ninety-six percent of the employers identified ethical judgment and integrity as important, while seventy-six percent said it was very important.

In this case, there appears to be a lack of synchronization between the demands of the market and output. Burant, Chubbuck and Whipp (2007) theorized that teacher education programs must emphasize moral sensitivity alongside content knowledge. A year later, Campbell (2008) provided even harsher criticism, “teacher education neglects the teaching of ethics” (Campbell, 2008, p. 372).

Employers aren't the only group to gain from ethical judgment and moral integrity. Students, particularly minorities and the poor benefit also. Gore et al (2007) conducted a longitudinal study of 3,000 students during a three-year period and found that minority students from lower socio-economic backgrounds benefited the most from instructors who held high expectations rooted in sound ethical and moral principles.

Variability of Alternative Pathways to Educator Licensure: In the 1990s, to address a projected shortfall in the nationwide educator talent, alternatives to educator licensure were introduced; many of which provided sparse training and meager support. To meet federal reporting guidelines during this period of rapid build-up, some states included alternative candidates in their definitions of “highly qualified teachers” (HQT) even before these candidates completed their minimal training. (National Commission on Teaching and America's Future [NCTAF], 1996, p. 93; Miller, McKenna & McKenna, 1998; Darling-Hammond, Kirby & Hudson, 1989).

The suspect practice of falsified reporting to imply educators educator preparation and experience did not appear to alarm regulatory authorities. To the contrary, the federal government may have been complicit in misreporting by lowering the baseline previously established for HQT. For instance, the U.S. Department of Education prepared a report to the U.S. Congress that was highly critical of the traditional research-based best practices for certification. Factors known to increase teacher preparation: attendance at schools of education, coursework in education, and practicums in student teaching were presented as possible options not mandatory

requirements for program design. (U.S. Department of Education, 2002).

Variability of Ethical Framework in the Teaching Profession: Opportunities to self deal, tamper with grades and exams, and falsify applications for federal funding have not been counterweighted by the industry. Professions with fiduciary responsibilities such as securities dealers, stockbrokers, psychiatrists, physicians, social workers, certified public accountants, and attorneys, have banded together to form national ethical standards to guide professional behavior (Hutchings, 2014). Conversely, individual educators must school themselves on state and municipal codes to maintain career mobility. Without a uniform, national and standardized code of ethics, Hutchings reasoned, decision making threatens to become spontaneous and capricious. Hutchings warned that the absence of national standards as not in the best interest of students and poses grave risk to educators.

Growing Trend Toward Lex Loci Arguments: An educator may have an increased risk for litigation; particularly if ineffective. In fact, it has been postulated that educators and institutions have a fiduciary responsibility to students in their care (Rumel, 2014). If one were to consider the educator to student relationship to extend beyond the act of imparting knowledge by way of classroom instruction, to assessment, motivation and pupil behavior management to role modeling and ultimately fiduciary obligation, then the education profession is wholly unprepared for such responsibility.

It is clear that educators greatly impact student outcomes. Evaluators found that there was a 52 percentile point difference of student scores when instructed by either a high performing or low performing teacher for three consecutive years (Sanders and Horn, 1998) . Impact extends beyond the classroom walls. Dr. Raj Chetty conducted research and determined that students with one year of ineffective teaching can lose \$1.4 million in lifetime earnings (Chetty, 2012).

Reductions in Oversight Due to Shifts in Employer Profiles: Shifts in employer profiles have resulted in government oversight reductions. According to Brewer and Hantschke (2009) the speed with which charters has entered the market constricts the reach of government; entities that have traditionally protected the public from abuse and self dealing with regulations and compliance.

“Because of the coupling of public operation with powerful ministries, employee unions and so on, the creation of privately-operated public schools enables governments to bypass these intransigent forces that make change from within so difficult. U.S. charter schools have been used as a vehicle to reduce stifling effects of over-regulation and union contracts, without directly challenging the constituencies that benefit from these” (p. 232).

Researchers Severns and Glueck (2014) point to Washington, DC, Chicago and New York City districts where billions were spent to embrace charters. These districts oversee schools that have been called ‘holding pens’ with large percentages of failing students, drop outs, and truant heading straight to jail; not higher learning institutions. The autonomy and increased decentralization proffered traditional schools results in the de-prioritization of policies and procedures to deter occupational fraud. This void leaves an educator class without specific direction, and an industry more prone to fraud.

Shifts in Teacher Demographics: Twenty-five years ago, the number of years experience in education most often cited by educators was fifteen years, according to the National Commission on Teaching for America's Future (2010). By 2007, a colossal drop to one to two years occurred and has held steady eight years later (Headen, 2014). The implications of inexperienced classroom teachers populating public schools, particularly those serving Blacks, other minorities and the poor were not realized. Researchers now show that inexperience undermines stability, hinders reform and threatens student progress.

As the more inexperienced are employed in education, the requirement for job-embedded training in content, pedagogy, ethics, and appropriate interaction become critical. The study "Beginners in the Classroom: What the Changing Demographics of Teaching Mean for Schools, Students, and Society" explored why new teachers leave education. The answer? Lack of support. This lack of support may translate to lowered student achievement. For instance, Hanushek (2010) found that an ineffective teacher can cost a student as much as six months of learning every year. Or re-stated in another way, "in a single academic year, a good teacher will get a gain of one and a half grade-level equivalents, while a bad teacher will get a gain equivalent to just half a year" (pg. 84). Ineffective educators may be at a greater risk or more prone to participate in appropriate, illegal, unethical misconduct.

Shift from Tenured Professor to Adjunct and Part-time Faculty for Post Secondary: The Association of Governing Boards (2013) reported that 70 percent of higher education faculty nationwide are adjunct or "contingent faculty." This is in stark contrast to almost a half century ago, whereby approximately 78.3 percent of higher education faculty were tenure-track and 21.7 percent were non-tenure track. Poor orientation, lagging recruitment schedules, job insecurity, low benefits, and inequitable salaries are employment conditions faced by adjunct faculty. An adjuncts' lack of orientation, professional development, and access to formal assessments to identify instructional deficiencies and develop corrective actions cannot be overstated and can grossly effect student learning. Kezar and Maxey (2013) write "from the moment they are first hired and continuing through their employment, they do not have access to resources such as funding to attend training and conferences to support their professional development" (p. 4).

Industry Denial of Potential for Fraud and Corruption: The education industry is not immune to risks associated with occupational fraud. According to the 2014 Global Fraud Study (ACFE, 2014), the education industry ranked fifth for reported cases of fraud, followed by retail and insurance.

In spite of its ranking, the American Educational Research Association (AER), highlighted scholarly inquiries into education and best practices at its annual convention. More than 13,000 k-12 and post secondary educators participated in 1,600 to 1,700 sessions based upon a telephone interview with Kimberly Ricks, Meetings Associate (T. Foust-Mead, September 2, 2014). In this regard, a search of the terms: fraud, crime, misconduct, cheating, illegal and corrupt yielded just 16 scholarly papers. Of the sixteen presentations, 6 emphasized student misconduct; not adults.

Even beyond the ivy tower of academic research, on-the-ground educators can be found to express, “There are no ethical dilemmas in public education... because there are no ethics. There is no right or wrong. See nothing, hear nothing, report nothings, punish no one. Ethics does not exist,” research participant (Hutchings, 2014, p. 34). This finding is consistent with earlier research undertaken by Fusco (2005) and Segal (2005) in which it was found that the industry appeared to deny the existence of fraud and corruption.

“One impediment to reform that no one is seriously studying in the debate over how to improve public schools is systematic fraud, waste and abuse. This missing is surprising because a number of school districts particularly large urban ones have compiled impressive records of fraud and waste.” (Segal, page xxi)

Educator Fraud

“Occupational fraud occurs when an employee abuses the trust placed in him or her by an employer for personal gain.” (page 6, 2012 Global Fraud Study: Report to the Nations on Occupational Fraud and Abuse, ACFE). Even so, educator fraud has yet to be defined with specificity such that the causes and risks are fully explored. There were futile attempts in the early 2000s to present an expose’ of corruption occurring in education by Segal (2004) and Fusco (2005) but failed to convince.

This article emphasizes fraud, white collar crime and corruption committed by educators internally and/or educational programming service providers who most often possess educational credentials and use inside access to commit fraud and white collar crime within the education sector. Schemes carried out by outsiders are not included in the analysis.

Image 2. The Fraud Diamond



Criminal behavior is learned (Sutherland, 1955) in association with others who have criminal attitudes and values. How are these attitudes developed? One must consider the literature which draws heavily upon the ‘Fraud Diamond’ indicating that there are four factors involved with occupational fraud: (1) rationalization, (2) incentive, (3) opportunity, and (4) capability (Wolfe, D.T. & Hermanson, D.R. 2004). Wolfe (2004) coined the term “The Fraud Diamond” to summarize the concept, the perpetrator’s

rationalizations that the act is not illegal or that ‘everyone is doing it’, an incentive element present the motive, a perceived opportunity, and the potential criminal has the skills or capability to commit the crime.

The Educator Fraud Prism

While the Fraud Diamond, and its predecessor, the Fraud Triangle, is a universally accepted concept for describing fraud, it is insufficient for analyzing fraud perpetrated by educators in an educational setting. The prism is three dimensional and is viewed through an enforcement risk lens which has the power to bend one’s perception of rationalization, incentive, opportunity, and capability.



Image 3. The Educator Fraud Prism™

Enforcement risk, or the political will and enforcement power a regulatory body has to exact criminal penalties and sanctions, prior history of enforcement, and the perpetrator's assessment of the enforcement risk ultimately determines whether a fraudulent act will be committed once

and whether it will be continued throughout his/her educational career. This a new term and concept. "When people have the opportunity to commit a crime, they weigh the downside such as the risk of getting caught and punished and being stigmatized by society against the upside" (Segal, p. 41).

Current Trends for Stiffer Penalties: A former educator was indicted on 45 counts for mail fraud, fraud related to identity documents and identity theft for his role in leading a ring of proxy cheaters in three states. Further, 140 educators in the Atlanta Public School System were implicated while 35 were charged with 65 criminal counts of false statements, theft by taking, and racketeering. A former El Paso district superintendent was sentenced to four years imprisonment, \$56,600 in fines, and \$180,000 in restitution for contract fraud and data manipulations. Five Philadelphia School district educators were arrested and accused of "perpetuating a culture of cheating" on state exams (Graham, Woodell, & Vargas, May 10, 2014). They were charged with tampering with public records, perjury, forgery, and criminal conspiracy. After an 18 month investigation at Columbus City Schools, Ohio, the state auditor found that the district superintendent had presided over a culture of fraud involving changing grades, deleting absences and falsifying the number of dropouts (Bush & Richards, January 28, 2014). To express the gravity, the Federal Bureau of Investigation joined the case to investigate (ibid).

Historical Perspective: Traditionally, educator fraud cases often resulted in disciplinary actions such as reprimands, suspensions, loss of license and job (Olson & Fremer, 2013). For instance, Jacob and Levitt (2003) while conducting a study of educator cheating in Chicago, predicted that if the allegations were substantiated, the educators suspected cheaters would face disciplinary action.

Rationalization

Although any illegal act is a considered a crime to be prosecuted and punished accordingly; society has viewed white collar crime as a victimless. Academicians specializing in legal policy de-emphasize the harm caused by fraud and endorse lenient sentencing (Podgor, 2007). "Fraudsters view their crimes as being victimless, not dangerous to society and causing no visual or physical damage to anyone or anything" (Perri, 2011, p. 44). Other rationalizations include poor working conditions and low salary levels.

K-12 Salary: The National Education Association (NEA) reports that teachers have a lower starting salary than other professions requiring similar skills and

responsibilities. As teachers invest more years into teaching and gain experience, the pay gap widens. (NEA, n.d.).

The annual pay for teachers “has fallen sharply over the past 60 years in relation to the annual pay of other workers with college degrees.” Further, in a review of salary data, they argue that “the average earnings of workers with at least a four year college degree are over 50 percent higher than the average earning of a teacher.” (NEA, p. 1.).

Teachers and educational support personnel “often work two to three jobs to make ends meet” (pg. 5). The Center for American Progress, posted similar findings (2014). Teacher heads of households with ten years experience qualify for federal assistance. In addition to welfare, more than 20 percent of teachers in eleven states hold a second job to earn more money (ibid).

This conclusion conflicts with the those rendered by the U.S. Bureau of Labor Statistics (USBLS) in its annual National Compensation Survey (NCS, 2013). Lawrence Mishel, President of the Economic Policy Institute explained that the method by which USBLS calculates teacher salary is based upon the days worked (190 official school days divided by five, resulting in a 38 week work year) in comparison to the 48 to 52 work weeks non-educators are expected to work annually. Therefore, the NCS data grossly underestimates the hours teachers work each year and significantly overestimates annual teacher salaries based upon a hypothetical hourly wage rate.

Contingent Faculty. Part time, contingent and/or adjunct professors represent 74.7 percent of US faculty. (April 28, 2014, The Atlantic). The America Federation of Teachers interviewed 500 part-time and adjunct faculty members. Fifty-seven percent indicated that their salaries were inadequate while 41 percent said that job security was not meeting their expectations (March, 2010). What specifically does ‘not meeting expectations mean?’

The Association of University Professors compared salary data for contingent and tenure track professors. Based upon \$2,700 pay per three-credit course and calculated to \$21,600 annual salary (four course per semester) in contrast to the average \$66,000 starting salaries for tenure-track professors (2010). Segran of *The Atlantic* cited *New York Times* whereby an adjunct “has been reduced to sleeping in her car, showering at college athletic centers and applying for food stamps” (The Atlantic, Adjunct Revolt: How Poor Professors Are Fighting Back, April 26, 2014, p 1).

Incentive

A common incentive to commit a crime occurs when a person’s earned income is not adequate to meet the desires, wants or needs of an individual.

Bonus and Rewards; According to Eckstein of the International Institute for Educational Planning (2003), global educational reform “are frequently submitted to abuse and even systematic corruption”(p. 34). “The prevalence of cheating is shown to respond to relatively minor changes in teacher incentives” (Jacob and Levitt, 2003, p. 846). Such pressures include the threat of punishment for low scoring schools and the opportunity for reward in high performing schools.

These findings were mirrored by the Atlanta Public Schools Special Investigator's Report (2011) and cited in Kaufmann (2012):

“intense fear of failure to meet annual performance targets for student achievement, culture of fear, retaliation and intimidation, failure of principal and administrative leadership and the use of an incentive's policy,” (p. 6)

Teacher competitive pressures and working conditions, considered secondary incentives were cited by Kaufmann (2012) and included the desire

‘to be first and nobody wanted to be last’ and to move up to older more prestigious grade levels, teaching lower grades were perceived as a demotion. Educators who participated in fraud and corruption were awarded after-school posts and preparatory periods if participated and conversely, were assigned to problem classes or not given the opportunity to move to teach students at higher grade levels, if refused to participate.” (p.7)

Poor Qualifications and Experience to Meet Aggressive Goals: While reform introduces myriad forms of incentives, it has simultaneously liberalized the certification requirements and lowered experience levels of teachers. A U.S. Department of Education survey cited in the *New York Times* found that 25% of teachers in secondary public schools “lacked academic qualifications in the subject they teach, particularly in poorer school districts.” (Jerald, C., Ingersoll, R. 2002: *New York Times*. 2002, August 22. In: *New York Times*, A12). This is striking considering that younger, less experienced teachers were more likely to cheat than teachers with more experience (Jacob and Levitt, 2003).

Opportunity

A key aspect of white collar crime, particularly in the education sector is the pressures caused by perceptions that (1) ‘everybody does it, so I will too, (2) there is no one to judge me critically and (3) no one to stop me.’ How is this criminal behavior likely in an educational setting, considering that the general public holds the highest regard for educators, particularly grade school teachers? (Gallup, 2013).

Differential Association: Edwin Sutherland (1978) reasoned that when a law-abiding person interacts socially with criminals in an intimate setting, this person, as a consequence of the social interaction can make poor decisions leading to criminality. With increased frequency of the illegal act, the more skilled the person becomes in committing successive crimes. This theory became known as ‘Differential Association’, developed in collaboration with Donald Cressey.

Management's Unclear Messaging: How is it that in some educational settings, crime is committed and in others it is not? Jeffrey (1965) concluded that there are incidents in some settings because such sites lacked positive social reinforcers and role modeling in comparison to similarly situated places with correspondent populations and workforce, who used positive social pressures and role modeling to deter fraud.

Within the literature, executive leaders situated at the pinnacle of an organization are expected to use communication and role modeling to support ethical decision-making (Brown et al, 2005). “These top managers create and maintain an ethical culture by consistently behaving in an ethical fashion and encouraging others to behave in such a manner as well.” Ardichvili, et al 2008, p. 2). The Association of Certified Fraud Examiners adds, “employees will do what they witness their bosses

doing” (Tone at the Top, ACFE, n.d, p.1). Creating and enforcing clear conduct codes, acceptable behaviors, and expected procedures and paramount for management (Trevino et al, 1999).

Weak Internal Controls and Lenient Oversight: The failure of top managers to model ethical behaviors, identify impermissible conduct, clearly communicate acceptable acts and to enforce them place an educational institution at grave risk for fraud. According to the Association of Fraud Examiners (Tone at the Top, n.d.),

“there are many different forms of misconduct that go on in the workplace and are observe by employees every year. Yet, many employees do not report this unethical conduct. Only 55 percent of employees said that they reported misconduct they observed in the workplace; a 10 percent drop from the previous survey conducted in 2003” (p.4)

Reasons given for not reporting: employer failed to take corrective action, disclosure of complainant identity, retaliation, and uncertainty of whom to contact. “Employees who witnessed their company actively following its code of ethics were the *most* likely to report misconduct in the workplace, according to the 2005 National Business Ethics Survey (Tone at the Top, n.d., pg. 4).

Capability

Possession of certain skills and tools are a requirement for committing fraud. Another aspect of capability; access is often overlooked. While automated internal control systems mechanisms do much to deter educator fraud; inadequate supervision by an immediate supervisor greatly increases the threat.

Poor Management Training: School leader programs are wholly inadequate to meet the needs of candidates. Reference materials are outdated and are not aligned to generally accepted practices of leadership (AACTE, 2001; Copland, 1999; Elmore, 2000; Lumsden, 1992; McCarthy, 1999; Murphy & Vriesenga, 2004).

Poor Classroom Supervision: As some educational leadership programs may provide training in labor law, negotiations, personnel policy; finding the time to supervise employees has been a challenge. Chait (2010) found that “many schools currently lack the staff capacity—both in terms of expertise and staff hours—to observe all of their staff and write up their findings throughout the year (p. 9).”

Top Level Access and Authority: Capability within top management involves using one’s inside knowledge, access and authority for controlling resources and directing subordinates to commit illegal acts. In separate cases, school district superintendent leaders in El Paso, Texas; Atlanta, Georgia; and Camden, New Jersey were alleged to have either awarded themselves unauthorized performance bonuses, manipulated student enrollment, participated in a grade fixing scheme, falsified student transcripts, tampered with state standardized assessments and/or instructed subordinates to do. (Sanchez, 2006) (Zubrzycki, 2012). The former executive director of a public charter school in the District of Columbia was sentenced to 9 months in prison for embezzling \$29,000 of federal funds. (OIG, April 24, 2014).

Deterrence Landscape

The Educator Fraud Prism™ considers the traditional assessment of the enforcement risk as relatively low. Therefore, this section discusses the manner by which the perception will be elevated in coming years.

Increase the Certainty of Punishment: The probability that a crime will be discovered and the length of time from discovery of an investigation, to court proceedings, due process and ultimately punishment, greatly impacts a potential criminal's assessment of risk (Albercht, 2014). The lack of clarity regarding what constitutes an offense considered in an administrative, civil and or criminal proceeding may fester an environment ripe for fraud.

Further, the industry is moving toward penalties and sanctions that are so dreadful that the wrongdoer will not commit the offense in the future (Jeffery, 1965). Further, the industry has gradually raised educator awareness about the negative consequences of committing an offense by showcasing (as appropriate) the actual infliction of the punishment upon the wrongdoer (ibid).

Community Outreach and Confidential Informants: Segal (2005) notes that the effects of fraud can be devastating. Segal concluded that "the most academically beleaguered school systems tend to be the ones with the longest most serious, most systematic investigative records" (page, xxii). Likewise, the same detrimental effects can be found on a global scale. Ferraz et. Al (2011) examined federal education misappropriation data from Brazil's local government and determined that fund leakages impact educational attainment. Based upon evidence from 56 countries whose students participated in the Program for International Student Assessment (PISA), reductions in educational resources resulting from funding misappropriations can reduce educational quality and that "there was a strong negative association between a country's corruption level and its performance on the international standardized exams." (Kaufmann, Kraay, & Mastruzzi, 2009, p. 24). This author has proposed an aggressive public and community outreach program to inform the public that educator fraud is not victimless and has a negative lifelong consequences for students persist.

Policy Development and Laws: The knowledge of the consequences of illegal acts are unnecessary for most law-abiding people (Packer, 1968; Zimring and Hawkins, 1973; Andenaes, 1974, Wikstrom et al 2012). McCabe (1999) U.S. Department of Education, OIG (2013) however, when addressing educator misconduct recommended the establishment of clearly written and interpreted institutional policies, laws, regulations, and sanctions to address fraud and is slowly becoming the norm.

Visibility of Enforcement Personnel: There is substantial evidence that increasing the visibility of enforcers responsible for the prevention and detection of crime can significantly heighten the perceived risk of apprehension and may deter crimes in the process (Nagin, 2013). To change the perceptions of lenient oversight and to formally impose societal pressures at the district level, three of the largest school districts, New York City, Chicago and Los Angeles, established independent enforcement agencies known as inspectors general to provide oversight for educational programming. (Segal, 2004). This author has proposed similar enforcement agencies across the

nation. The primary purposes of these offices would be to detect, deter and investigate fraud, waste and abuse and would be manned by professional auditors and investigators independent of state and local school management.

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Contact email: tonya@ishareknowledge.com OR tonya.mead@dc.gov