

VERIFY · MONITOR · PROCTOR

PREPARED FOR

[AGENCY NAME]

INTEGRITY FOR AMERICA'S FIREFIGHTERS

Examination and Training Integrity Program

A no-cost, twelve month proof of concept to run defensible, identity verified, fully audited promotional examinations, certification testing and training records, presented to

[AGENCY NAME].

PREPARED FOR

[AGENCY NAME]

DATE

[MONTH YEAR]

ENGAGEMENT

12 months · No cost

100% BROWSER BASED IN STANDARD DEPLOYMENT

HUMAN REVIEWED DECISIONS

SOC 2 TYPE II AUDITED

CUSTOMER CONTROLLED RETENTION

NO PUBLICLY REPORTED BREACH

PREPARED BY

Integrity Advocate

PROOF OF CONCEPT PROPOSAL
CONFIDENTIAL

The exam is the easy part. The evidence is the hard part.

Every promotional examination, certification test and training record your department produces is a document that may one day have to be defended. Not to us, and not to a vendor. To a passed over candidate, to a union grievance, to a civil service commission, to a reporter, or to a court.

Right now, for most fire departments in the United States, the evidence available when that day comes is a score, a sign in sheet and somebody's memory of the room. That is not a criticism of any individual department. It is how the whole market is built. Every vendor selling examinations to the fire service sells you a **score**. None of them sells you a **defensible record of who produced it**.

Integrity Advocate proposes to close that gap at **no cost for a full year**. You keep ownership of your examination content, your ranks, your process and your decisions. We supply the independent integrity layer around it: identity verified against a government issued photo ID, a human reviewed record of every session, and a timestamped audit trail that belongs to you and that you can put in front of a hearing officer.

In exchange, we ask to co-publish an anonymized study of the results covering ease of use, candidate experience, value and integrity posture, with **[AGENCY NAME]** named as the founding agency. Our shared goal is a proven, repeatable model that any of the roughly 27,000 registered fire departments in the United States can adopt with confidence.

\$0

Cost of this twelve month proof of concept

No licence fee, no per seat charge, no implementation cost

55%

Of fire departments have members who engage in structural firefighting but have not been formally trained

NFPA, Fifth Needs Assessment of the US Fire Service, December 2021. 11% response rate, disclosed on page 6.

\$128.7M

Back pay liability set by a federal court over two written fire entrance examinations

US Department of Justice, 12 March 2012, United States v. City of New York

What we are proposing, in four lines

1. **Scope.** Promotional examinations for **[RANKS: e.g. Lieutenant, Captain, Battalion Chief]**, certification and recertification testing, entry level and academy testing, and the training completion record behind high liability certifications.
2. **Term.** Twelve months from **[START DATE]**, at no cost, terminable by **[AGENCY NAME]** at any time for any reason on thirty days written notice.
3. **What you keep.** Your examination content, your scoring, your promotion decisions, and every session record we produce.
4. **What we ask.** A co-published anonymized study, and your candid assessment of what worked and what did not.

The argument of this document in one sentence: a compromised examination is expensive, but an *indefensible* examination is expensive whether or not it was ever compromised.

Examination integrity is not a hypothetical risk in the American fire service.

The following are documented, named, dated incidents from the last decade. None of them is a projection, an industry estimate or a vendor statistic. Each is drawn from a government report, a court record, a regulator's file or first hand reporting, and each is cited on page 15.

ENTRY LEVEL · AUGUST 2025 · CONNECTICUT

A proctor with his back turned, and nine minutes alone

On 15 August 2025, thirteen Waterbury Fire Department cadets sat the EMT certification examination administered by Seymour Ambulance. Surveillance video obtained by the city showed the proctor seated with his back to the recruits for most of the test, and leaving the room twice, once for more than nine minutes. During those gaps recruits were recorded talking, looking at one another's screens and using their phones. One recruit admitted using Google to answer roughly 85 of the 120 questions.

The city's investigation, as reported by Firehouse and FireRescue1, found that seven of the thirteen had engaged in academic dishonesty and two more had failed to report it. All seven implicated recruits resigned. Four were cleared and sworn in.

Sources: Firehouse, FireRescue1, September and October 2025. The city's investigative report is not public; these findings are reported second hand.

PROMOTIONAL · FEBRUARY 2015 · CALIFORNIA

"Not uncommon"

In February 2015 the Los Angeles County Auditor-Controller completed a review of examination integrity at the Los Angeles County Fire Department, prompted by a *Los Angeles Times* investigation. As reported by the *Times* on 23 February 2015, the audit found that at least nine different tests had circulated among department personnel, including the civil service examination for fire captain, and that 17 sworn officials, among them a battalion chief and ten captains, had obtained and forwarded confidential examination content.

The *Times* quoted the auditors' conclusion that "the totality of our findings suggests that dissemination of examination content between fire personnel is not uncommon." For the March 2015 retest, the department transported examinations to the Pomona Fairplex in an armored truck guarded by sheriff's deputies.

Source: Los Angeles Times, 23 February 2015. The audit report itself is not published in the county's public audit library; these findings are attributed to the *Times*' reporting of the audit and are not quoted from the report.

PROMOTIONAL · 2023 TO 2025 · FLORIDA

An eligibility list voided, a chief resigned

A division chief at the Hialeah Fire Department obtained a copy of a prior year's oral examination, described by the city's human resources director as "very similar" to the live instrument, and forwarded it to a candidate before the August 2023 battalion chief and assistant chief of operations examination. That candidate scored a perfect 100.

The Hialeah Personnel Board voted unanimously in late November 2024 to void the oral portion. The fire chief resigned. The three candidates who had passed were ordered to retake the oral examination in March 2025, roughly nineteen months after the original test.

Sources: City of Hialeah Personnel Board minutes, 6 January 2025; Firehouse; WLRN; FireRescue1, December 2024.

The pattern, and why it should worry a chief

Look at what these three have in common. In none of them did the department detect the compromise through its own examination process. Waterbury was caught because a third party's surveillance camera happened to be recording. Los Angeles was caught by a newspaper. Hialeah was caught by a complaint from inside the department.

In every case, the department's own record of the examination proved nothing either way. That is the actual problem. Not that firefighters cheat, which is rare, but that **a department that runs a clean examination has no more evidence of it than a department that ran a compromised one.**

What evidence would you produce?

If [AGENCY NAME] writes a promotional examination, administers it, and scores it with no independent verification of who sat the test and how they took it, what evidence does the department produce when someone alleges the process was compromised?

For most agencies, honestly answered, the answer is: very little. A score sheet. A sign in log. The recollection of whoever was in the room. That is the gap this program is built to fill, and it is worth being precise about why it matters more in the fire service than almost anywhere else.

Promotions in the fire service are appealable by design

A promotional examination is not a hiring test. It is a decision about who carries more authority on a fireground, more discretion, and more public trust, made inside a civil service system that exists specifically to allow that decision to be challenged. Most jurisdictions give a candidate a narrow window to contest an examination, and once that window closes the record of the administration is the only record there will ever be.

In Massachusetts, for example, a candidate challenging the validity of a fire promotional examination or its study materials must file **within seven days of the examination date**, and the state's determination on multiple choice grading is final. Whatever record exists on the day of the test is the record that governs the appeal.

An examination that decides who commands a fireground should be the most defensible process in the building. In most departments it is among the least documented.

The record cuts both ways, and that is the point

It would be easy to sell this as a way to catch cheaters. That is not the strongest argument, and it is not the one we lead with, because a department that adopts an integrity program in order to catch its own members starts from a position it cannot defend at a union hall.

The stronger argument is that **a complete, independent record protects the honest candidate at least as often as it exposes the dishonest one**. Consider the two cases from the previous page from a member's point of view:

- In Hialeah, three candidates who passed an examination legitimately were ordered to sit it again nineteen months later, because there was no way to separate them from the compromise. A verified record would have separated them on day one.
- In Waterbury, four cadets were cleared. They were cleared because a surveillance camera in someone else's building happened to capture the room. Had it not, all thirteen would have carried the allegation.

Under the model most vendors sell today, a candidate whose examination is terminated on a proctor's suspicion has no record to appeal with. Neither does the department. Both parties are arguing from memory.

What "defensible" actually means here

We use the word deliberately, and narrowly. A defensible examination record has four properties, and we will produce all four:

1. **Identity established** against a government issued photo ID at the start of the session, and documented.
2. **Conduct observed and reviewed by a trained human being**, not decided by software.
3. **Every determination timestamped, reasoned and attributable** to a named reviewer.
4. **The record delivered to the agency** as the agency's own property, not held by the vendor.

The promotional exam is one day a year. Certification is every week.

Promotional testing is where the litigation is, but it is not where the volume is. The recurring, high consequence, weakly supervised testing in a fire department is certification and recertification: Firefighter I and II, Fire Officer, Instructor, hazmat, ARFF, EMT and paramedic recertification, and the continuing education behind all of it.

That testing has moved online in a way promotional testing largely has not, and the supervision has not kept pace with the delivery.

CERTIFICATION ENFORCEMENT · 2018 TO 2026 · INDIANA

Eight years of process, and the state still could not prove it

A state examination integrity case against a Muncie fire captain ran from 2018 onward. The Indiana Board of Firefighting Personnel Standards and Education permanently revoked two of his instructor certifications and suspended twenty-four others for three years. An administrative law judge reversed those sanctions on 24 September 2024. On 23 March 2026 the Marion Superior Court held that the Board had acted arbitrarily and capriciously, found "no credible, corroborated, or substantial evidence" of a violation, ordered the certifications reinstated and ordered the state to expunge the record.

Roughly thirty witnesses were interviewed. Two agencies were involved. A federal copyright suit was filed by the national registry. Eight years later the state was unable to prove what had happened in the examination room, because there was no record of the examination room.

Sources: Indiana DHS administrative law judge non-final order, 24 September 2024; Marion Superior Court order, 23 March 2026, reported by Fire Law Blog. The same officer is the subject of separate, unrelated misconduct proceedings brought by the city in July 2026; those allegations have nothing to do with the examination record, which is precisely the point being made here.

The states have already written down what they require. They just cannot deliver it.

This is the most useful fact in the entire proposal, and it comes from a state regulator rather than from us.

Colorado's Division of Fire Prevention and Control publishes its written examination proctor policy as a public document, most recently revised **1 January 2026**. It requires the proctor to have each candidate "show federal or state issued photo identification (e.g. driver's license) and check their name against the list of registered candidate's names." It requires that "all test candidates shall be in full view of the examination proctor." It requires the proctor to swear, **under penalty of perjury**, that "the candidate(s) was/were under the constant supervision by me (the proctor) during the entire examination," on an affidavit citing C.R.S. 18-8-404 and 18-8-405. And it bars a proctor from administering "written examinations for courses that they have instructed to the candidates."

The document contains no provision for remote, online or virtual administration of any kind.

Colorado has already decided that identity verification against government photo ID and continuous human supervision are non-negotiable for fire certification. It has no way to deliver them except by assembling people in a room, with a certified officer off the floor and a locked container of iPads.

DFPC WRITTEN PROCTOR POLICIES, REVISED 1 JANUARY 2026

Colorado is not unusual. Both the Florida Bureau of Fire Standards and Training and the California Office of the State Fire Marshal deliver their certification examinations through Pearson VUE, and neither offers an online proctored option. This is verifiable against Pearson VUE's own published index of every program worldwide that offers OnVUE online proctoring: as of August 2026 the only fire service program on that global list is Queensland Fire and Emergency Services in Australia. **No US state fire certification program offers a remotely proctored examination through Pearson VUE.**

That proves an absence within Pearson VUE. It does not prove those states offer no remote option through some other channel, and we do not claim it does.

Who was actually trained?

The same principle that governs a promotional examination, verified identity plus an auditable record, is what stands behind a training file when an incident review, a federal inspection or a line of duty investigation opens it.

Training records in the American fire service are, almost universally, self reported and self attested. That is not a marginal observation. It is documented by the federal government in two separate reports.

FEDERAL WHISTLEBLOWER INVESTIGATION · 2017 · RHODE ISLAND

7,051 training records with no instructor listed

A Naval Inspector General investigation conducted at the direction of the US Office of Special Counsel (OSC File No. DI-16-5887) and completed 9 June 2017 substantiated both whistleblower allegations against Naval Station Newport Fire & Emergency Services: that administrators created and maintained false training records, and that personnel lacked the requisite training to safely perform their duties.

Investigators found that of the training records reviewed, **7,051 had no instructor listed at all**. They identified **110 instances** in which personnel were credited with completing training on days they were on leave or off duty. They found **515 courses** recorded as completed on Sundays over a seven month period, despite testimony that no training was held on Sundays. And they found **518 records** showing employees had completed "Shipyard Training" at an installation with no shipyard.

The Fire Chief retired from federal service effective 29 April 2017. The Training Officer separated on 18 March 2017.

Source: Report of Investigation, public release version. OSC does not publish this report at a permanent URL; the public copy is hosted by WPRI-12.

FEDERAL REGULATOR · 31 MAY 2016

The regulator collects names, titles and dates, and does not check the certificates

The DOT Office of Inspector General reported (Report AV-2016-067) that FAA inspectors verifying Aircraft Rescue and Fire Fighting training are required to collect only "names of firefighters, titles of classes, and dates of training." No certificates. No supporting documentation.

Reviewing a sample of 106 firefighters drawn from a universe of 952 across 10 airports, the OIG found that at one airport "all of the 11 training records we examined between 2013 and 2014 showed that firefighters did not complete 2 or more of the 11 segments within 12 consecutive months," with one firefighter missing six of the eleven required segments.

Source: DOT Office of Inspector General, Report AV-2016-067, 31 May 2016.

Where this shows up on the balance sheet

Your ISO rating runs on training records. ISO's Fire Suppression Rating Schedule scores a community out of 105.5 points: 10 for Emergency Communications, 50 for the Fire Department, 40 for Water Supply and 5.5 for Community Risk Reduction. Within the Fire Department's 50 points, **Training is worth 9**, more than engine companies (6) or ladder companies (4). ISO's published description of its field survey states that its representative will "examine records of training." Training credit is awarded against records. Where the records are not there, the credit is not there.

Your accreditation runs on documentation. In October 2025 the Commission on Fire Accreditation International revoked the Orlando Fire Department's accreditation, attributed in local reporting to a small number of documents the department failed to submit. As of August 2026 the Orlando Fire Department does not appear on CPSE's published list of accredited agencies. An accreditation built on documentation was lost for want of documentation.

WHAT WE ARE NOT CLAIMING

We searched the record specifically for a case in which falsified training records were shown to have driven a wrongful death or negligence judgment against a fire department. **We did not find one, and we will not imply otherwise.** What is documented is that inadequate training leads to line of duty deaths and eight figure liability, that NIOSH routinely pulls training records in fatality investigations, and that falsifying those records is separately chargeable as a felony and separately fatal to an ISO rating. The training record is what a department is judged on afterward. That is the claim, and it is the only one we make.

The instrument is cheap. Defending it is not.

Fire promotional and entrance testing is among the most litigated instruments in American public employment. The numbers below come from court documents and federal agency records, not from industry estimates.

SUPREME COURT · NEW HAVEN, CONNECTICUT

A \$100,000 examination, and roughly \$5 million in liability

New Haven paid Industrial/Organizational Solutions, Inc. \$100,000 to develop and administer its 2003 lieutenant and captain promotional examinations, a figure stated on the face of the Supreme Court's opinion in *Ricci v. DeStefano*, 557 U.S. 557 (2009). The Civil Service Board deadlocked two to two and declined to certify the results.

The litigation ran seven years to the Supreme Court and back. Judgment was entered for the plaintiffs on 29 July 2011, the city was ordered to make promotions from those lists, and local reporting put the damages at roughly \$2 million to the twenty plaintiff firefighters plus approximately \$3 million in plaintiffs' attorneys' fees.

A \$100,000 examination generated something on the order of \$5 million in liability and seven years of litigation, and the results sat uncertified and unused for five of those years.

Sources: *Ricci v. DeStefano*, 557 U.S. 557 (2009); D. Conn. 3:04-cv-01109, judgment 29 July 2011; damages figures from New Haven Independent, 28 July 2011, attributed as local reporting. Note: the vendor was IOS, which still sells remote public safety testing today.

FEDERAL COURT · NEW YORK CITY

\$128,696,803, and it was never about intent

In *United States v. City of New York*, the district court held that FDNY's 1999 and 2002 entry level written examinations had an unlawful disparate impact and were not job related or consistent with business necessity. On 12 March 2012 the court set aggregate back pay liability at **\$128,696,803**.

On 14 May 2013 the Second Circuit **vacated the finding of intentional discrimination** and remanded that claim for trial before a different judge, while affirming the disparate impact liability, affirming the appointment of a court monitor over FDNY hiring, and leaving the back pay remedy in place. The monetary relief consent decree of **\$99,098,358.29** was approved on 11 March 2015, and total monetary relief including attorneys' fees reached approximately **\$113.5 million**. A federal monitor supervised FDNY hiring for roughly a decade.

The money was never predicated on intent. It was predicated on a test.

Sources: US Department of Justice, 12 March 2012; *United States v. City of New York*, 2d Cir., 14 May 2013; Civil Rights Litigation Clearinghouse case 10324.

CONSENT DECREE · 5 FEBRUARY 2019 · FLORIDA

\$4.9 million and a new promotional examination

On 5 February 2019 the US District Court for the Middle District of Florida approved a consent decree resolving companion race discrimination suits brought by the Department of Justice against the Consolidated City of Jacksonville and by the EEOC against the Jacksonville Association of Firefighters, Local 122, over promotional examinations in the Jacksonville Fire and Rescue Department. The City agreed to pay **\$4.9 million** into a settlement fund, to create **up to 40 settlement promotion positions**, and to **develop a new promotional examination**.

Sources: EEOC newsroom; US Department of Justice; Clearinghouse case 14070.

And this is not only a big city problem

The *Charlotte Observer* reported on 19 May 2026, from public records it obtained, that the City of Charlotte spent more than \$1 million over roughly seven years defending and then settling discrimination claims brought by Black firefighters over promotion denials, including approximately \$490,000 in outside legal fees and at least \$525,000 in settlements. That figure includes defence costs, which is what makes it the most useful number here for a department of [SIZE] members.

AN HONEST NOTE ON THE ENFORCEMENT CLIMATE

Executive Order 14281 of April 2025 directs federal agencies to deprioritise enforcement of disparate impact liability, and in early 2025 the Department of Justice moved to dismiss a series of fire and police discrimination suits. We are not going to pretend otherwise, and we are not going to sell you federal enforcement risk that has receded.

What has not changed: the statute, the private right of action, state civil service law, and union grievance machinery. Ricci, the Charlotte matters and the New Jersey litigation below were all brought by private plaintiffs or through civil service process, not by the federal government.

The procedural risk is the quieter one. A 2019 New Jersey public safety promotional examination was invalidated on appeal in August 2025, six and a half years after it was administered, on a defect in how the examination was administered and scored. More than a hundred officers promoted from that list faced demotion. The department had no independent record of the administration to fall back on.

Everyone sells a score. Nobody sells the record.

We reviewed the current public materials of the principal vendors selling examinations into the American fire service. **None of them publishes all three of the following:**

1. Identity verification documented against a government issued photo ID
2. Human review of the session rather than algorithmic flagging alone
3. The reviewed session record delivered to the hiring or certifying agency as its own evidentiary artifact

VENDOR	REMOTE DELIVERY	LIVE OR HUMAN PROCTORING	DOCUMENTED ID VERIFICATION	REVIEWED RECORD TO THE AGENCY
Stanard & Associates	Yes	Not published	Not published	Not published
Industrial/Organizational Solutions	Yes	Yes, up to 15 per session	Not published	Not published
National Testing Network	Yes	Yes, recorded	Not published	Not published
FPSI	Yes	Not published	Not published	Not published
Public Safety Testing	Yes	Not published	Not published	Not published
State fire certification bodies	No	In person only	Yes, in person	Not applicable

This is a claim about what these vendors publish in their current public materials, reviewed August 2026. We invite any of them to correct it.

Three findings worth reading twice

Stanard & Associates markets remote administration of the National Firefighter Selection Test on the basis that "all your candidates need is a computer and an internet connection," inviting departments to let candidates "test from just about ANYWHERE." Its published remote testing materials describe no proctor and no identity verification of any kind.

Industrial/Organizational Solutions proctors remotely with "a combination of computer-based technology and live proctors," at up to **fifteen candidates per session**. Its public materials describe no identity verification and no session recording. A department using that service has a supervised session with an unverified subject, which is the exact inversion of what matters: what is on the desk is a cheating risk, but who is in the chair is an integrity risk.

National Testing Network does put a live proctor on the session and states that candidate activity is "recorded for security." Its published Virtual Testing FAQ contains no identity verification or photo ID provision, and no statement that any session record is provided to the hiring agency. A candidate whose examination is terminated on a proctor's suspicion, which is NTN's stated remedy, and who then challenges that termination before a civil service commission has, on the published record, nothing to challenge it with. Neither does the department.

And a note on what "live proctoring" means

The only published per session pricing in this market comes from a College Board ACCUPLACER comparison document (copyright 2023): Examity's Live plus Audit at \$25 per session and Automated plus Audit at \$10 per session. The same document lists Examity's live proctoring at an **average proctor to student ratio of 1:2**, a figure Examity's own current pricing page repeats as a "2:1 average."

This is worth pausing on, because "live proctoring" is sold as though it means a person watching a candidate. On the industry's own published average it means **a person watching two candidates at once**, with a post hoc auditor review of the recording within 72 hours as the real second line of defence. If **[AGENCY NAME]** buys live proctoring from anyone, ask what the ratio is on your sessions and get the answer in the contract.

Those pricing figures are three years old and are program specific rates for a high volume higher education contract. They are a benchmark, not a quote, and not ours.

What Integrity Advocate actually does

We do not write your examination, score it, or have any view on who should be promoted. We establish who sat the test, produce a human reviewed record of how they sat it, and hand that record to you.

Identity, established and documented

At session start the participant presents a photo ID and a live photo. An automated check compares them and flags a possible mismatch. A trained human reviewer then confirms or overrides that result and documents the decision. Accepted identification includes driver's licences, passports and other program approved types. Participants may redact sensitive fields on the document; only the name and the face are required. This is included in every product tier.

Human review, stated precisely

Every Integrity Advocate session is subject to human review. Automated detection runs across the full session and identifies events that may require attention, including face matching against the submitted identification, gaze and movement, audio, additional faces in frame, objects in frame, and behavioural indicators of generative AI assistance.

No automated flag becomes an outcome on its own. A trained human reviewer evaluates every identity check and every flagged event in context against your program's rules, and a human records the final outcome with timestamped evidence and reviewer notes.

The algorithm decides what a person looks at. A person decides what it means.

WE ARE BEING DELIBERATELY LITERAL HERE, AND YOU SHOULD HOLD US TO IT

Some vendors in this category imply that no software is involved in their determinations. That is not true of us and we will not say it. Automated detection runs on one hundred percent of sessions and it is what decides which moments a human being examines. What we will state, in writing and in contract, is that **no automated output becomes a result without a named human reviewer adopting it, and every adoption carries a documented rationale.** That distinction is the whole product, and it is also the distinction that matters legally.

The record, delivered to you

Audit ready reporting is included in every tier. Every session produces a record showing the identity determination, every flag raised, the reviewer's finding on each, the timestamps, and the reviewer's notes. It is yours. It goes into your file, not only ours. When a candidate appeals, you open a record rather than reconstruct a memory.

01

Scope and rules

We sit with your training division and human resources to write down what is permitted in your examination, in your words. Reference materials, breaks, calculators, accommodations.

WEEK 1 TO 2

02

Union walkthrough

We present to **[IAFF LOCAL]** before deployment, not after. What is recorded, what is not, who reviews it, how long it is kept, and how a member appeals a finding.

WEEK 2 TO 3

03

Pilot cohort

One examination, one cohort, run in parallel with your existing process so nothing depends on us on day one.

WEEK 4 TO 8

04

Review and expand

You read the records. If they are not useful, we stop. If they are, we extend to the scope you choose.

MONTH 3 ONWARD

The objections, answered before you have to raise them

A program like this fails in the room where the city attorney and the union president are sitting. So we have put those conversations in the proposal rather than waiting for them.

"A federal judge already held this unconstitutional."

In *Ogletree v. Cleveland State University*, Judge J. Philip Calabrese of the Northern District of Ohio held in August 2022 that a remote proctoring **room scan** of a student's home constituted a search under the Fourth Amendment, and that the student's "privacy interest in his home outweighs Cleveland State's interests in scanning his room," because "the home lies at the core of the Fourth Amendment's protections." In an amended opinion in December 2022 the court confined relief to the named plaintiff.

It remains a single district court decision, binding on no other court, and no appellate court has adopted, extended or reversed it.

We are not going to argue it was wrongly decided. A fire department is a government actor on the same footing as Cleveland State, and a promotional candidate is a public employee being recorded in his own home by his employer. That is a harder case than a chemistry midterm, not an easier one.

SO HERE IS OUR RECOMMENDATION, AND IT COSTS US A FEATURE

Integrity Advocate's highest tier includes a room scan capability. **For a public safety promotional examination we recommend that it be contractually disabled, and we will write that into the agreement.** Identity verification and conduct review do not require sweeping a member's home, and the feature that creates the constitutional exposure is not the feature that produces the evidence.

"The algorithm flags Black candidates more often."

This objection is correct about algorithmic proctoring, and it is the reason to insist on human review rather than a reason to do nothing.

Yoder-Himes and colleagues, publishing in *Frontiers in Education* in 2022, analysed automated proctoring output for approximately 357 students across four STEM courses at a single university. Students with darker skin tones averaged **6.07 integrity flags per assessment**, against 1.91 for medium and 1.19 for lighter skin tones, more than three times the rate. The software's face detection located the student's face for an average of 78 percent of the assessment for darker skin tones, 87 percent for medium and 92 percent for lighter. It is a single institution study of one product and has not been corrected or retracted.

Separately, NIST's evaluation of demographic effects in face recognition (NIST IR 8280, December 2019) found that "across demographics, false positive rates often vary by factors of 10 to beyond 100 times." NIST has not walked this back; it has continued the work through NIST IR 8429 (2022) and an ongoing evaluation last updated March 2025, which still reports material differentials and attributes them to under representation in training data.

Our honest position: human review does not eliminate bias, it relocates it. A trained reviewer can also be inconsistent. What a human decision with a retained record *is*, and an algorithmic score is not, is **auditable and appealable**. And because our pipeline includes a face matching component, the NIST differentials apply to that component regardless of who makes the final call. That is exactly why a human makes the final call.

"The union will grieve it, and they will be right."

Promotional examination procedures are terms and conditions of employment, and whether a monitoring technology is a mandatory subject of bargaining is genuinely unsettled in most states. We found no IAFF national policy on remote examination proctoring and we do not claim one exists.

The only strategy we will recommend is bringing the local in before procurement, not after, and giving them a defined role in setting what is recorded, what is not, who reviews it, how long it is kept and how a member appeals. The argument that survives a hall meeting is the true one: under the model the market sells today, a member wrongly accused of cheating has nothing to defend himself with. Under this one he has the same record the department has.

Four more that will come up

"Your industry gets breached, and these are firefighters' home addresses."

In June 2020 the online proctoring service ProctorU suffered a breach of **444,453 user records**, subsequently shared across hacking communities, containing names, email and physical addresses, telephone numbers, usernames and passwords stored as bcrypt hashes. The company confirmed it in August 2020. In May 2025 Pearson disclosed a compromise in which attackers exfiltrated large volumes of data over a period of months.

This objection cannot be argued away, and a first responder roster is a more sensitive asset than a student list. The only credible response is architectural, and it is a document rather than a promise: collect less, retain briefly, encrypt, and put breach notification obligations in the contract. Integrity Advocate has **no publicly reported data breach**, and we will confirm our incident history contractually and in writing rather than asking you to take a marketing claim on faith.

TWO FACTS YOU NEED BEFORE THIS GOES TO YOUR IT DIRECTOR, AND WE WOULD RATHER YOU HEARD THEM FROM US

Data residency. Integrity Advocate stores collected information on servers in **Canada** (AWS). Many US public agencies require in country storage. If **[AGENCY NAME]** does, tell us in the first meeting, because it is a threshold question and not a detail.

Retention. Session video, audio and photographs are typically deleted within 24 hours. Where an institution requests longer retention, they may be kept for up to three years. Name, email and browsing information are retained for a maximum of 730 days. Retention is customer controlled, which means **[AGENCY NAME]** sets it, and it also means the department, not us, will have to reconcile the competing pulls described below.

"Those recordings become public records."

Examination content and scoring keys are broadly exempt from disclosure under state public records law. **A video of a candidate is not a test question**, and it is more naturally analysed as a personnel or investigatory record, which is a different exemption and a different balancing, state by state.

There is a genuine collision here and we would rather name it than let your city attorney discover it: biometric privacy statutes push toward destroying data as soon as its purpose is served, some state employment regulations push toward retaining automated decision data for years, and public records law governs disclosure of whatever survives. No vendor can resolve that for you. What we will do is arrive with a **written retention schedule drafted against [STATE] law** and agree it with your counsel before the first session, rather than after the first request.

"Biometric privacy law will bury us."

Illinois' Biometric Information Privacy Act provides liquidated damages of \$1,000 per negligent violation and \$5,000 per reckless or intentional violation, plus fee shifting. It was amended by SB 2979, effective 2 August 2024, so that repeated collections of the same identifier from the same person by the same method now constitute a single violation, which sharply reduced aggregate exposure without reducing the per person floor. Exposure in this sector is not theoretical: in *Veiga v. Respondus, Inc.* the proctoring vendor **agreed to a \$6,250,000 settlement fund** covering Illinois test takers between November 2015 and June 2023.

These statutes bind private entities, which means the vendor, not the department. That shifts exposure without eliminating the department's political and reputational ownership of it. Written notice, a stated retention period and an executed release are the mitigations, and they are cheap.

"We already do this in person and it works fine."

This is the strongest objection on the list and it deserves a straight answer. In person proctoring did not fail at the moment of the examination in any of the cases in this document. It failed **upstream**: at custody of materials, at who had access, at whether the same instrument was reused.

Remote proctoring does not fix any of those failures and we will not claim it does. What it fixes is the identity question and the record question. And it removes the physical artifact, which is what Los Angeles County was moving in an armored truck under sheriff's escort. That is the honest scope of the claim.

What is included, tier by tier

Integrity Advocate ships three tiers. We have set out what each one actually includes, including what it does not, because what a tier omits is information a buying committee needs.

ProctorLite LOW STAKES	ProctorPlus MID STAKES	ProctorPro HIGH STAKES
✓ Clear image of participant ✓ Accepted photo ID ✓ Session name and ID match ✓ Remain in camera view ✓ No other participants ✓ No headphone use ✓ No electronic devices ✓ AI detection plus human review ✓ Audit ready reporting – No external resources – Screen monitoring – Audio feed – Full video feed	✓ Everything in ProctorLite ✓ No external resources ✓ No messaging applications ✓ Screen monitoring ✓ Onscreen content protection ✓ CounterAI ✓ Audit ready reporting – Audio feed – Full video feed – Second camera	✓ Everything in ProctorPlus ✓ Audio feed ✓ Full video feed ✓ Second camera ✓ Extended customisable flagging ✓ Audit ready reporting – Room scan, disabled by our recommendation
REFRESHER AND AWARENESS TRAINING	CERTIFICATION AND RECERTIFICATION	PROMOTIONAL EXAMINATIONS

Our recommendation, and the reason for it

Promotional examinations should run on ProctorPro, with room scan contractually disabled. This is not an upsell, and under this proposal it does not cost you anything, so we would rather explain the reasoning than have it assumed.

Audio feed and full video feed exist only in ProctorPro. If a promotional examination is going to be grieved, and in a civil service system it eventually will be, the department needs the underlying record and not only a summary of flags. Proposing a lower tier and then promising video evidence for an appeal would be promising something we could not deliver.

Room scan is the one ProctorPro capability we recommend turning off, for the reasons on page 9. It is the feature that draws the Fourth Amendment argument, and it is not the feature that produces the evidence.

What is not included, stated plainly

- **We do not write or validate your examination.** Item development, job analysis and content validation stay with you or your existing testing vendor. Nothing in this program displaces that relationship, and if [AGENCY NAME] currently spends [AMOUNT] annually on [VENDOR], this program does not replace that spend or reduce it.
- **We do not score, rank or recommend.** No Integrity Advocate finding is a promotion decision, and none should ever be described as one.
- **We do not fix upstream custody.** Who holds your item bank, who has access to it and whether instruments are reused are department controls. We will flag what we see, but we do not own them.
- **We have not previously served a municipal fire department.** See page 12.

Twelve months, no cost, and an exit at any time

12

Months, at no cost to [AGENCY NAME]

No licence fee, no per seat charge, no implementation or training cost

30

Days written notice to terminate, for any reason or none

Your records remain yours on exit, exported in full

1

Thing we ask in return: a co-published anonymized study

Reviewed and approved by you before publication

What we provide

- Unlimited sessions across the scope [AGENCY NAME] selects, for twelve months.
- Configuration of your examination rules, accommodations and appeal pathway, written with your training division and human resources.
- A presentation to [IAFF LOCAL] before any member sits a monitored session.
- A written retention schedule drafted against [STATE] public records and privacy law, agreed with your counsel before the first session.
- A named account contact and a named escalation path, not a ticket queue.
- Full export of every session record at any time, and on exit.

What we ask

- Permission to co-publish an **anonymized** study covering ease of use, candidate experience, administrative burden, value and integrity posture, with [AGENCY NAME] named as the founding agency. No candidate is identified, no score is published, and [AGENCY NAME] reviews and approves the text before it appears anywhere.
- Your candid assessment, including the parts that did not work. A study that only says good things is worth nothing to either of us.
- A reference conversation with peer agencies, at your discretion and only if you would give one honestly.

Procurement, and the twelve month schedule

A QUESTION WE WOULD RATHER ASK NOW THAN DISCOVER LATER

A genuinely no cost engagement is not an expenditure and generally does not trigger a dollar threshold bidding requirement. The real questions are different ones, and we would rather raise them ourselves:

One. Gift and ethics rules. Value under this program flows to the agency, never to an individual, and never to anyone who would sit on the evaluation of a subsequent award. We will not offer travel, meals, sponsorship or anything else of value to a named official, and we would ask you to hold us to that.

Two. A vendor who runs a free pilot is sometimes excluded from the follow on competitive award. **We are asking your procurement officer to answer that in writing before we start.** If the answer is that this pilot disqualifies us from bidding later, we would still like to run it, and we would rather know.

Three. Examination integrity services are properly scoped as a professional service rather than a software licence, which in most states places them outside sealed bid machinery. Your city attorney will have a view on that and we will follow it.

Timeline

PHASE	TIMING	WHAT HAPPENS
Agreement	Weeks 1 to 2	No cost agreement executed. Procurement question answered in writing. Retention schedule drafted with counsel.
Configuration	Weeks 2 to 4	Examination rules, accommodation pathway and appeal process written with the training division and human resources. Union walkthrough.
Pilot cohort	Weeks 4 to 8	One examination, one cohort, run in parallel with the existing process. Nothing depends on us.
Review	Week 9	You read the records. Go or no go, entirely your call.
Expansion	Months 3 to 11	Scope extended to the areas you choose from promotional, certification, entry level and training verification.
Study	Month 12	Anonymized results drafted, reviewed and approved by [AGENCY NAME], then co-published.

Who we are, and what we have not done

Integrity Advocate has been operating since 2015. We provide identity verification, remote proctoring and participation monitoring to regulators, certifying bodies, awarding organisations and safety training providers.

What we can substantiate

- **Independent audit.** Integrity Advocate undergoes independent SOC 2 Type II audits, most recent audit period [AUDIT PERIOD]. The report is available under NDA. A SOC 2 Type II engagement produces an attestation report, not a certification, and we will not describe it as one.
- **Deployment.** In standard deployment Integrity Advocate requires no download, no browser extension and no administrator permission. Participants launch from the browser. A separate lockdown browser is available for use cases that require one, and that component does involve installation.
- **Usability.** Integrity Advocate ranked first of six products in the G2 Summer 2026 Usability Index for Online Proctoring, with an index score of 8.45. We give you the denominator because you would find it anyway, and a ranking that survives being explained is worth more than one that does not.
- **Security record.** No publicly reported data breach. We will confirm our incident history contractually.
- **Accessibility.** Integrity Advocate states WCAG 2.1 Level AA conformance. [We have not published a VPAT or Accessibility Conformance Report; one will be provided on request before submission.]

WHAT WE HAVE NOT DONE, SAID FIRST RATHER THAN DISCOVERED LATER

Integrity Advocate has not previously served a municipal fire department, a law enforcement agency, or any US public safety organisation. There is no fire service case study, no first responder reference and no government customer in the United States. If that is disqualifying for [AGENCY NAME], we would rather you knew it on page 13 than in a reference check.

Our closest comparable work is with the **Alliance Safety Council**, a high risk industrial safety training organisation of more than sixty years' standing serving petrochemical, power generation and manufacturing employers, where the engagement is documented as taking high risk training remote without losing legal defensibility. That is your problem in different clothing: a workforce whose certification errors put people in physical danger.

The structural match is the **Condominium Management Regulatory Authority of Ontario**, a statutory licensing regulator whose credentials carry legal force, and whose examinations are appealable in the way a promotional examination is appealable. It is Canadian and it is not emergency services, and we say so.

Why we are proposing this at no cost

Because we want the reference, and we would rather earn it than claim it. The fire service is a market where nobody in our category has done this work, where the requirement is already written into state regulation, and where the incumbent vendors have published nothing about identity verification. We think a proven model here is worth more to us than a year of licence revenue, and we think [AGENCY NAME] should get the year for free for taking the risk of going first.

You keep your examination, your process and your decisions. We supply the evidence that they were what you say they were.

Every number in this document, and where it comes from

We have included this section because a proposal that makes claims about integrity should be checkable. Where a finding rests on trade press rather than a primary document, we say so in the text and here.

Waterbury, CT. Firehouse and FireRescue1, September and October 2025. Trade press only; the city's investigative report is not public.

Los Angeles County. Los Angeles Times, 23 February 2015. The Auditor-Controller report is not published in the county's public audit library; findings are attributed to the Times' reporting.

Hialeah, FL. City of Hialeah Personnel Board minutes, 6 January 2025; Firehouse, WLRN and FireRescue1, December 2024.

Muncie, IN. Indiana DHS administrative law judge non-final order, 24 September 2024 ([in.gov/dhs/](https://www.in.gov/dhs/)); Marion Superior Court order of 23 March 2026 as reported by Fire Law Blog.

Massachusetts appeal window. Adjemian v. Human Resources Division, Massachusetts Civil Service Commission, 5 October 2023.

Colorado DFPC. DFPC Written Proctor Policies, revised 1 January 2026; DFPC proctor resources page. dfpc.colorado.gov

Pearson VUE OnVUE index. pearsonvue.com published list of all programs offering OnVUE online proctoring, together with the Florida Fire Standards and California Fire program pages. Retrieved August 2026.

NAVSTA Newport. US Office of Special Counsel File No. DI-16-5887, Report of Investigation, public release version, Navy investigation completed 9 June 2017. OSC does not host the report at a permanent URL; the public copy is hosted by WPRI-12.

ARFF training oversight. US DOT Office of Inspector General, Report AV-2016-067, 31 May 2016.

ISO Fire Suppression Rating Schedule. Verisk/ISO Mitigation, items considered in the FSRS, and the published description of the field survey. The full FSRS is a paid document available free to fire chiefs from Verisk.

Orlando accreditation. Center for Public Safety Excellence published list of accredited agencies, checked August 2026; revocation reported by Central Florida Public Media and WFTV, October 2025.

NFPA Fifth Needs Assessment. NFPA, Fifth Needs Assessment of the US Fire Service, December 2021. Census of 26,258 departments, 2,969 responses, 11 percent response rate ranging from 7 percent among departments protecting under 2,500 people to 39 percent among those protecting over 500,000. We disclose that response rate because it cuts in our favour: the departments least likely to have answered are the small ones where the training gap is largest.

Ricci v. DeStefano. 557 U.S. 557 (2009). Docket D. Conn. 3:04-cv-01109, judgment entered 29 July 2011. Damages figures from New Haven Independent, 28 July 2011, and are local reporting rather than a filed settlement agreement.

United States v. City of New York. US Department of Justice release, 12 March 2012; United States v. City of New York, 2d Cir., 14 May 2013; Civil Rights Litigation Clearinghouse case 10324.

Jacksonville. EEOC newsroom and US Department of Justice releases, February 2019. United States v. Consolidated City of Jacksonville, 3:12-cv-451; EEOC v. Jacksonville Association of Firefighters, Local 122, 3:12-cv-491 (M.D. Fla.).

Charlotte, NC. Charlotte Observer, 19 May 2026, based on the newspaper's own public records request. Figures are as reported and are not independently verified here.

New Jersey 2019 examination. New Jersey Civil Service Commission decisions and published notices; Appellate Division decision of 22 August 2025. Status was live at the time of writing and should be re-checked before reliance.

Executive Order 14281. Federal Register, 28 April 2025.

Vendor claims. Current public materials of Stanard & Associates, Industrial/Organizational Solutions, National Testing Network, FPSI and Public Safety Testing, reviewed August 2026. Quotations are from those vendors' own pages.

Proctoring pricing and ratios. College Board ACCUPLACER remote proctoring comparison document, copyright 2023; Examity published pricing page, retrieved August 2026.

Ogletree v. Cleveland State University. N.D. Ohio, opinion August 2022, amended opinion December 2022.

Automated proctoring disparities. Yoder-Himes, Asif, Kinney, Brandt, Cecil, Himes, Cashon, Hopp and Ross, "Racial, skin tone, and sex disparities in automated proctoring software," Frontiers in Education, 2022. Approximately 357 students, one institution, one product.

Face recognition demographics. NIST Interagency Report 8280, December 2019; NIST IR 8429, 2022; NIST FRTE demographics evaluation, last updated March 2025.

Biometric privacy. 740 ILCS 14; SB 2979 effective 2 August 2024; Veiga v. Respondus, Inc., Circuit Court of DuPage County, Illinois, settlement fund of \$6,250,000 with final approval hearing set for 31 August 2023.

Proctoring breaches. Have I Been Pwned, ProctorU breach record, 444,453 accounts, breach date 26 June 2020; BleepingComputer reporting on the ProctorU and Pearson incidents.

Fire service scale. US Fire Administration, National Fire Department Registry Summary, January 2024: 27,166 registered fire departments.

Integrity Advocate claims. integrityadvocate.com, reviewed August 2026, including the product tier matrix, identity verification, human review, accessibility and privacy policy pages.