

**FLETC's Actions to  
Respond to and Manage  
COVID-19 at Its Glynco  
Training Center**





**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

September 30, 2021

MEMORANDUM FOR: Thomas J. Walters  
Director  
Federal Law Enforcement Training Centers

FROM: Joseph V. Cuffari, Ph.D.  
Inspector General

SUBJECT: *FLETC's Actions to Respond to and Manage COVID-19 at its Glynco Training Center*

JOSEPH V  
CUFFARI

Digitally signed by  
JOSEPH V CUFFARI  
Date: 2021.09.30  
09:27:38 -04'00'

Attached for your information is our final report, *FLETC's Actions to Respond to and Manage COVID-19 at its Glynco Training Center*. We incorporated the formal comments from FLETC in the final report.

The report contains one recommendation identifying action FLETC can take to enhance its overall effectiveness responding to the pandemic. Your office concurred with the recommendation. Based on information provided in your response to the draft report, we consider the recommendation resolved and open. Once your office has fully implemented the recommendation, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts. Please send your response or closure request to [OIGISPFollowup@oig.dhs.gov](mailto:OIGISPFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Thomas Kait, Deputy Inspector General for Inspections and Evaluations, at (202) 981-6000.

Attachment



# DHS OIG HIGHLIGHTS

## *FLETC's Actions to Respond to and Manage COVID-19 at Its Glynco Training Center*

September 30, 2021

### Why We Did This Review

After temporarily closing in March 2020 due to COVID-19, FLETC reopened its facilities in June 2020 with “reengineered training programs” designed to mitigate the risks associated with COVID-19. We conducted a review to determine actions the Glynco training center has taken to prevent and mitigate the spread of COVID-19 among staff and students.

### What We Recommend

We made one recommendation to the FLETC Director to improve COVID-19 student-housing protocols.

#### **For Further Information:**

Contact our Office of Public Affairs at (202) 981-6000, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

### What We Found

In March 2020, the Federal Law Enforcement Training Center (FLETC) temporarily closed due to the COVID-19 pandemic and began developing robust protocols to respond to and mitigate COVID-19 at its Glynco training facility. Before reopening in June 2020, FLETC created a formal plan to resume in-person training. Through this plan, along with other policies and procedures, FLETC established protocols in accordance with Centers for Disease Control and Prevention’s guidance and medical expertise. DHS students and component officials we spoke with confirmed that these protocols were in place and told us that, overall, they were effective. As a result of its mitigation measures, FLETC’s rate of positive COVID-19 tests was lower than that of its surrounding county. However, DHS students and component officials also raised concerns related to students not following certain requirements such as mask wearing. In instances such as these, FLETC largely relied on students’ home agencies to act to reinforce compliance with safety protocols among their students, or to take disciplinary action if necessary.

We also found, however, that FLETC did not always follow its own protocols for housing assignments related to COVID-19. Our analysis of housing records for a sample of 20 DHS students at the Glynco training facility found issues with housing assignments for half the students. For example, some students who were not positive for COVID-19 or were not quarantined for exposure to COVID-19 were still housed in the isolation dormitory. Some of the students who were incorrectly assigned to the isolation dormitory told us that they did not feel safe.

### FLETC Response

FLETC concurred with our recommendation, which is resolved and open.



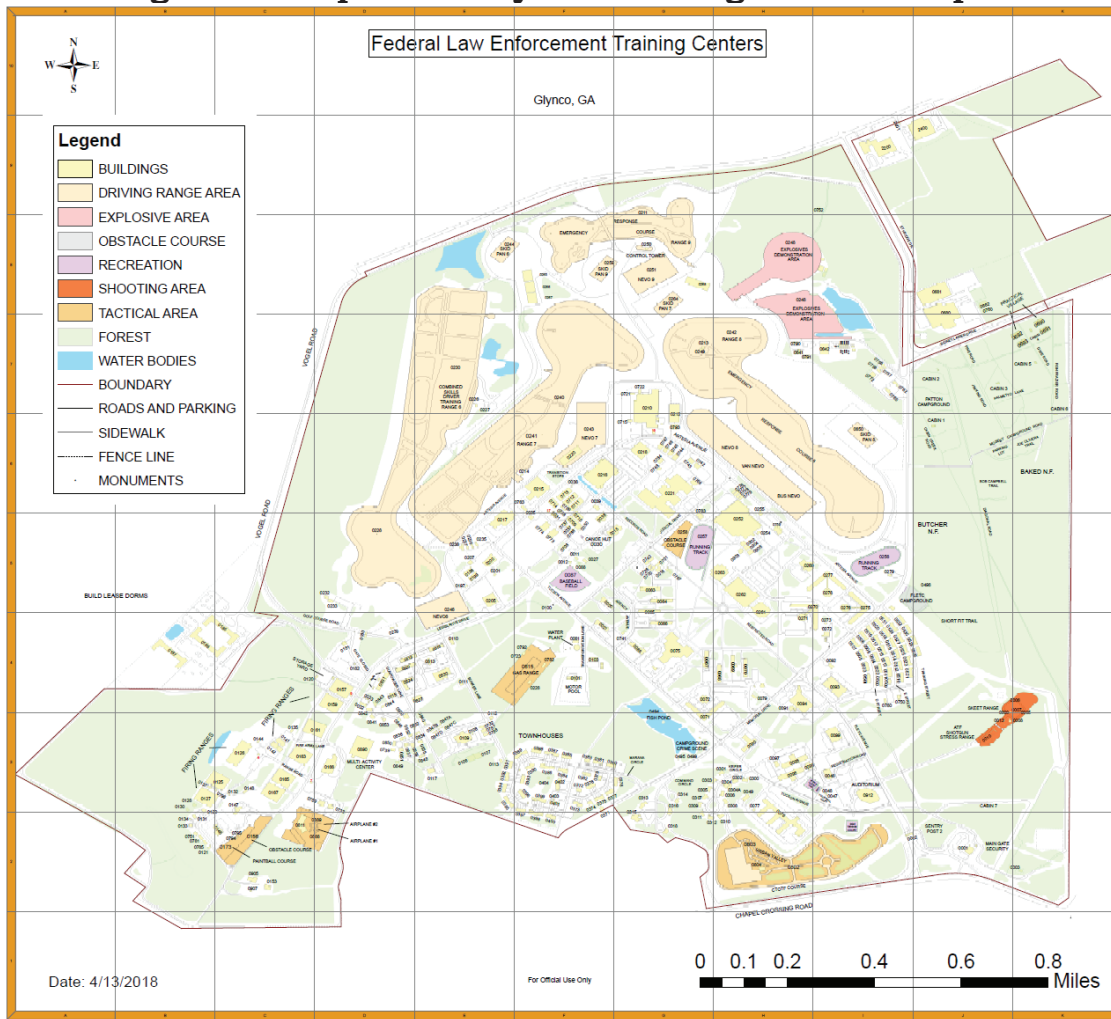
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## Background

Federal Law Enforcement Training Centers (FLETC) is the Nation's largest provider of training to Federal, state, local, and tribal law enforcement departments. Each year, FLETC and its Federal partners train nearly 60,000 law enforcement personnel at FLETC's in-residence training delivery sites in Artesia, New Mexico; Charleston, South Carolina; and Glynco, Georgia. FLETC trains law enforcement personnel throughout DHS, including within U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, Transportation Security Administration, U.S. Secret Service, and Office of Inspector General. FLETC's training facility in Glynco, Georgia, has nine dormitories with space for as many as 2,957 students. Figure 1 shows a map of the Glynco training facility campus.

**Figure 1. Map of the Glynco Training Center Campus**



Source: FLETC



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On March 20, 2020, FLETC temporarily canceled training at all its facilities as a precaution because of the continuing spread of COVID-19 across the Nation. In early June 2020, FLETC welcomed Federal law enforcement officers back to its facilities and implemented “reengineered training programs” designed to mitigate the risks associated with COVID-19. Yet, on November 1, 2020, FLETC paused training at its Glynco facility again, after 30 students tested positive for COVID-19. In response to these cases, FLETC officials asked students to self-isolate in their dormitory rooms. The Glynco facility resumed training on November 10, 2020. We conducted a review to determine actions the Glynco training center has taken to prevent and mitigate the spread of COVID-19 among staff and students.

### Results of Review

#### **FLETC Implemented Protocols to Respond to and Mitigate COVID-19**

We found that FLETC developed and implemented protocols in accordance with Centers for Disease Control and Prevention’s guidance and departmental medical expertise.<sup>1</sup> Between March 2020 and its reopening in June 2020, FLETC developed a formal plan to resume in-person training. Through this plan, along with other policies and procedures adopted throughout the pandemic, FLETC established protocols to mitigate the risk of COVID-19, including:

- requiring all personnel and students to wear face coverings in public and group settings;
- promoting social distancing among students, including staggering mealtimes at the dining hall to reduce occupancy, limiting double-occupancy dormitory rooms to single occupancy, and limiting passenger loads on campus buses;
- requiring students to answer screening questions 30 days, 14 days, and 72 hours prior to arrival, as well as upon arrival;
- performing daily temperature checks throughout their training program;
- testing students for COVID-19 twice, on day 1 and day 5 during restriction of movement (ROM);<sup>2</sup>
- testing entire classes if more than one student in a class tested positive;
- posting signage to promote social distancing and required mask wearing, as well as placing barriers designed to reduce exposure; and

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<sup>1</sup> Lacking its own medical staff, in March 2020, FLETC reached out to the Office of the Chief Human Capital Officer and the Office of Countering Weapons of Mass Destruction to leverage departmental medical expertise. FLETC received assistance from a medical doctor on detail from the Office of Countering Weapons of Mass Destruction.

<sup>2</sup> The second test on day 5, during the ROM period, was necessary to detect any individuals who might have contracted COVID-19 just prior to arriving at FLETC, such as during transit.



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- performing enhanced cleaning and disinfecting of facilities, including training venues and equipment, and other high-touch spaces.

FLETC also restricted the movement of newly arrived students, as well as those who tested positive or were exposed to COVID-19. Specifically, new students arriving at FLETC undergo a ROM period, which was initially set at 14 days.<sup>3</sup> During ROM, newly arrived students isolate in a separate dormitory and are restricted from any training venues and the FLETC gym, to ensure to the extent possible that students commencing training are not COVID-positive before they begin interacting with other students, instructors, and staff. In addition, students who test positive for COVID-19, are symptomatic, or are identified as being potentially exposed to COVID-19 are isolated from other students. COVID-positive students are required to remain in isolation for 10 days or until they are symptom free for 48 hours.<sup>4</sup>

In more recent months, FLETC has begun providing regular on-campus COVID-19 vaccination events for students, staff, and contract employees.<sup>5</sup> As of August 2021, FLETC has arranged for more than 1,500 staff and 1,800 students to receive at least one dose of the COVID-19 vaccine across all of its training facilities.

FLETC officials, personnel from DHS components,<sup>6</sup> and students whom we interviewed confirmed that these protocols were in place. Our review of plans, guidance, standard operating procedures, and other documents confirmed the screening and testing procedures were in place. In addition, photos of the dining hall, classrooms, and other high-traffic areas showed posted signage, exposure-reducing barriers, and other measures put in place to promote social distancing. (Appendix B includes example photographs of signage and exposure-reducing barriers.) Students and DHS component officials we spoke with told us that, overall, FLETC implemented effective protocols in response to COVID-19.

The DHS students and component officials we spoke with raised concerns related to unsafe student gatherings, students not wearing masks, and

<sup>3</sup> The 14-day ROM was reduced to 10 days on October 1, 2020, because FLETC's testing data did not show any instances of individuals developing symptoms between day 10 and day 14 following a negative test. On March 17, 2021, FLETC announced that fully-vaccinated students did not need to complete ROM.

<sup>4</sup> FLETC had more than 100 trained contact tracers among its staff and partner organizations who completed a certification course from the Johns Hopkins University to serve as contact tracers.

<sup>5</sup> In partnership with the Coastal Health District of Georgia, FLETC began providing vaccinations on January 26, 2021.

<sup>6</sup> There are more than 95 Federal agencies and organizations that use FLETC's training infrastructure, referred to as "Participating Organizations." We interviewed several officials from DHS components assigned to positions supporting their law enforcement training operations at the Glynco training facility.



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students not observing separate dining hours in the cafeteria for ROM students and in-class students. For example, FLETC established specific times for students in ROM to go to the dining hall for meals to avoid interaction with other students. However, several students we spoke to said that they frequently observed students who were not in ROM eating at the dining hall during the ROM student mealtime. In instances such as these, FLETC officials relied on students' home agencies for enforcement. Component officials acknowledged that students' home agencies bore the responsibility of ensuring their students complied with FLETC's safety protocols and for acting when they did not.

Reflecting the overall effectiveness of its protocols, FLETC's rate of positive COVID-19 tests was lower than that of its surrounding county. In February 2021, when FLETC presented its testing data to the DHS Chief Medical Officer, its overall rate of positive tests was 2 percent.<sup>7</sup> In comparison, Glynn County, where the Glynco training facility is located, typically had a positivity rate of between 5 and 10 percent at that time. Appendix C shows the positive test results for the period of our review from October 2020 to June 2021.

### **FLETC Did Not Always Follow Its Own Protocols for COVID-19 Related Housing Assignments**

FLETC designated separate dormitories for students during ROM and during isolation but did not always follow its housing protocols. FLETC's COVID-19 Response Procedures state that isolation rooms "shall be single occupancy with dedicated bathrooms where the dorm room entry is from an outdoor environment." FLETC primarily used a set of two buildings that each had 144 rooms with dedicated bathrooms and outdoor entryways for ROM and isolation dormitories. (Appendix D includes photographs of these two buildings with outdoor entryways.) FLETC's practice was to house ROM students in one of these buildings and to house isolation students in the other building.<sup>8</sup>

We analyzed housing records for a sample of 20 DHS students at the Glynco training facility from October 2020 to April 2021.<sup>9</sup> Within our sample, the 12 students who required isolation because of a positive COVID-19 test, because

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<sup>7</sup> The rate of positive tests was based on the total tests conducted (15,752) and the total positive tests (317) at the Glynco training facility since it began testing.

<sup>8</sup> FLETC changed which building was used for ROM and which was used for isolation several times after resuming training in June 2020. FLETC personnel told us that during the November 2020 outbreak, isolation students were housed on the third floor of the ROM building for 2 weeks, but did not indicate that there were any other occasions when isolation and ROM students were housed in the same building.

<sup>9</sup> Our sample was judgmentally selected and is not a statistical sample that can be used to extrapolate from the entire population of students.



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they were symptomatic, or because they were identified as potentially exposed through contact tracing, were appropriately housed in isolation dormitories.<sup>10</sup>

However, we identified issues with ROM housing assignments for 10 of the students in our sample. Specifically, these 10 students completed at least a portion of ROM in a dormitory that was not supposed to house ROM students at the time. Rather than being assigned to the ROM dormitory, these students were assigned to the isolation dormitory or to another building which had previously been used as the isolation dormitory. In addition, 4 of these 10 students were also housed in regular student housing for the first 3 days of their ROM period prior to being incorrectly housed in the isolation dormitory for the remaining 7 days of ROM. Finally, we also found that one of the 10 students who was incorrectly housed in the isolation dormitory during ROM tested positive for COVID-19, but FLETC did not move the student to another room away from other ROM students until 5 days later.<sup>11</sup>

When asked about these discrepancies, the FLETC official responsible for making housing assignments told us he was aware that there may have been instances when students were not housed according to their housing protocols. He explained that FLETC housing schedulers faced challenges as the number of students on-campus, the number of COVID-19 cases, and the restrictions on housing assignments all grew simultaneously after FLETC resumed in-person classes. He said the only reason any students would be assigned to housing outside of the “business rules” would be because FLETC did not have the space to assign the students in accordance with those business rules. Nevertheless, housing students who were not positive for COVID-19 or who were not quarantined for exposure to COVID-19 in the isolation dorm could create risk for those students assigned to the wrong building. Several of the students we spoke with who were assigned to the isolation dorm during their ROM told us that they did not feel safe.

After the conclusion of our fieldwork, FLETC had to pause training at the Glynco training facility from August 2, 2021 to August 9, 2021, because of a COVID-19 outbreak likely associated with the nationwide spread of the COVID-19 delta variant. Leading up to the pause, at least 49 students tested positive for COVID-19, many of whom were fully vaccinated, according to FLETC personnel. The FLETC officials further explained they reinstated several safety protocols and announced upon reopening that it would only allow fully-vaccinated students on campus for at least 120 days.

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<sup>10</sup> The housing records we obtained did not provide all the information needed to assess whether the duration of isolation aligned with FLETC’s guidelines.

<sup>11</sup> FLETC officials told us that when they housed ROM and isolation students in the same building, they would separate them by floor or have them on opposite ends of the same floor.





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### Recommendations

We recommend the FLETC Director:

**Recommendation 1:** Implement controls for the remainder of the COVID-19 response and in plans for future pandemic responses to ensure housing protocols to separate individuals in isolation from those who are not in isolation are clearly defined and followed.

### Management Comments and OIG Analysis

FLETC concurred with our recommendation. FLETC described corrective actions to address the issues identified in this report. Appendix A contains FLETC's management comments in their entirety. We also received technical comments to the draft report and revised the report as appropriate. We consider the recommendation resolved and open. A summary of FLETC's response and our analysis follows.

**FLETC Response to Recommendation 1:** Concur. FLETC has reinforced pre-existing practices regarding housing protocols and implemented a new approval process for any modifications to those protocols. FLETC is memorializing protocols related to housing assignments in a revised standard operating procedure specific to pandemic operations. FLETC expects to complete these actions October 29, 2021.

**OIG Analysis:** We consider these actions responsive to the intent of Recommendation 1, which is resolved and open. We will close this recommendation when FLETC completes its standard operating procedure for housing assignments during pandemic operations.

### Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Pub. L. No. 107-296) by amendment to the *Inspector General Act of 1978*.

Our objective was to determine actions the Glynco training center has taken to prevent and mitigate the spread of COVID-19 among staff and students. We reviewed FLETC's policies and procedures to prevent and mitigate the spread of COVID-19, and assessed measures such as screening and testing, social distancing, and contact tracing and quarantining. We interviewed FLETC officials, DHS component personnel working at FLETC, and a sample of students who attended classes between October 2020 and April 2021. We also reviewed housing records for a sample of 20 DHS students who attended



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training at FLETC between October 2020 and April 2021. We judgmentally selected the sample from a list of 3,489 DHS students, including 12 students who were in isolation during their training, as well as students spread across the timeframe of the sample.

We conducted this review under the authority of the *Inspector General Act of 1978*, as amended, and according to the *Quality Standards for Inspections* issued by the Council of the Inspectors General on Integrity and Efficiency.

The Office of Inspections and Evaluations major contributors to this report are Erika Lang, Chief Inspector; Steven Staats, Lead Inspector; Donna Ruth, Senior Inspector; Jason Wahl, Senior Inspector; Renita Caracciolo, Senior Inspector; and Brendan Bacon, Independent Referencer.



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**Appendix A**  
**FLETC Comments to the Draft Report**

*Federal Law Enforcement Training Centers*  
U.S. Department of Homeland Security  
1131 Chapel Crossing Road  
Glynco, Georgia 31524



**Homeland  
Security**

September 27, 2021

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.  
Inspector General

FROM: Thomas J. Walters      THOMAS J  
Director                      WALTERS

Digitally signed by THOMAS J  
WALTERS  
Date: 2021.09.28 15:45:45 -04'00'

SUBJECT: Management Response to Draft Report: “FLETC’s Actions to  
Respond to and Manage COVID-19 at Its Glynco Training Center”  
(Project No. 21-013-SRE-FLETC)

Thank you for the opportunity to comment on this draft report. The Federal Law Enforcement Training Centers (FLETC) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

FLETC is pleased to note the OIG’s recognition of FLETC’s successful measures to control the spread of COVID-19 at its Glynco, Georgia training delivery point, including:

- requiring all personnel and students to wear face coverings in public and group settings;
- promoting social distancing among students, including staggering mealtimes at the dining hall to reduce occupancy, limiting double occupancy dormitory rooms to single-occupancy, and limiting passenger loads on campus buses;
- requiring students to answer screening questions 30 days, 14 days, and 72 hours prior to arrival, as well as upon arrival;
- requiring newly arriving students to undergo a Restriction of Movement (ROM) period for 14 days (later reduced to 10 days) before interacting with the broader FLETC community;
- testing students for COVID-19 twice, on day 1 and day 5 during the ROM period;
- performing daily temperature checks throughout their training program;
- testing entire classes if more than one student in a class tested positive;
- posting signage to promote social distancing and required mask wearing, as well as placing barriers designed to reduce exposure; and



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- performing enhanced cleaning and disinfecting of facilities, including training venues, equipment, and other high-touch spaces.

The OIG also observed that FLETC's rate of positive COVID-19 tests was lower than that of the surrounding county, reflecting the overall effectiveness of its protocols, and that, in partnership with the Coastal Health District of Georgia, FLETC began to provide regular on-campus vaccination events for students, staff, and contract employees on January 26, 2021.

FLETC remains committed to effectively managing the risk of transmission of infectious diseases and providing a safe and secure training environment for students and staff.

The draft report contained one recommendation, with which FLETC concurs. Attached find our detailed response to the recommendation. FLETC previously submitted technical comments addressing an accuracy issue under a separate cover for OIG's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Attachment

**Attachment: Management Response to Recommendation  
Contained in 21-013-SRE-FLETC**

OIG recommended the FLETC Director:

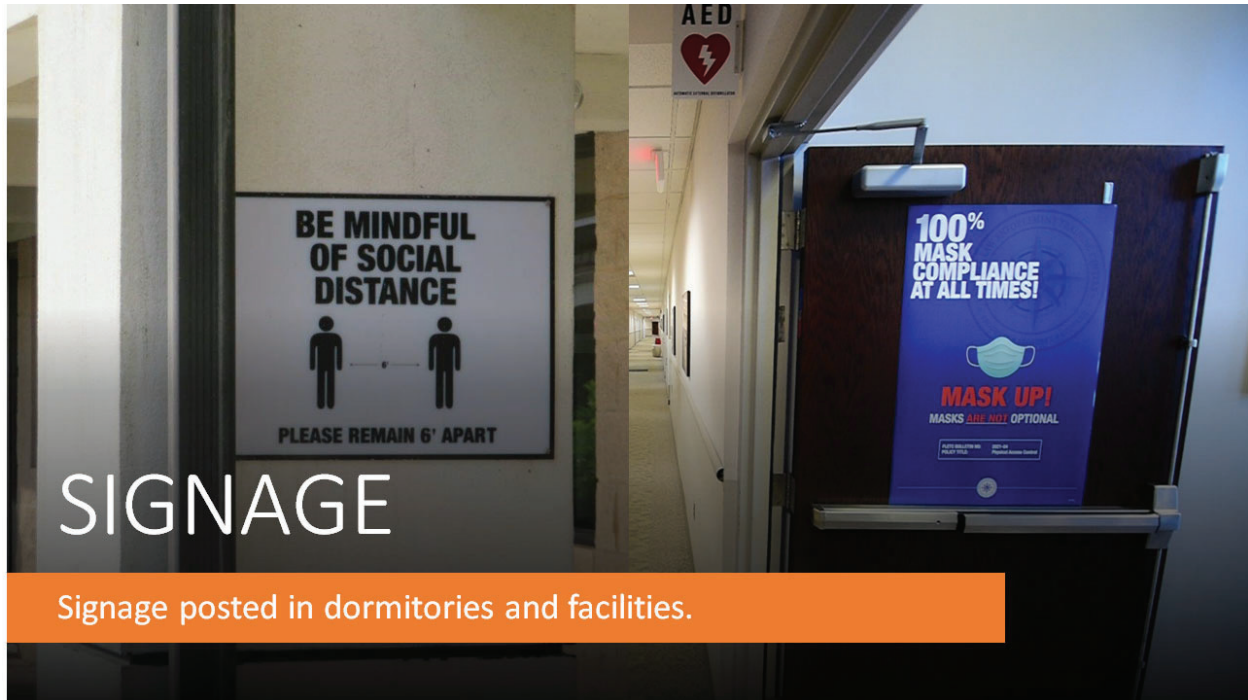
**Recommendation 1:** Implement controls for the remainder of the COVID-19 response and in plans for future pandemic responses to ensure housing protocols to separate individuals in isolation from those who are not in isolation are clearly defined and followed.

**Response:** Concur. FLETC has reinforced pre-existing practices regarding housing protocols and implemented a new approval process for any modifications to those protocols. Specifically, as of August 1, 2021, FLETC identified, and set aside a specific dormitory exclusively for students who have either: (1) tested positive for COVID-19; or (2) were placed into isolation after presenting to FLETC's Health Services Unit as symptomatic. Likewise, FLETC has identified, and set aside, a specific dormitory exclusively for students in restriction of movement (ROM) status prior to beginning training. Further, on November 23, 2020, FLETC decided to establish a process whereby FLETC senior leadership must review and approve any deviations from established housing protocols prior to implementation. Finally, FLETC is memorializing protocols related to housing assignments in a revised standard operating procedure specific to pandemic operations.

Estimated Completion Date: October 29, 2021.



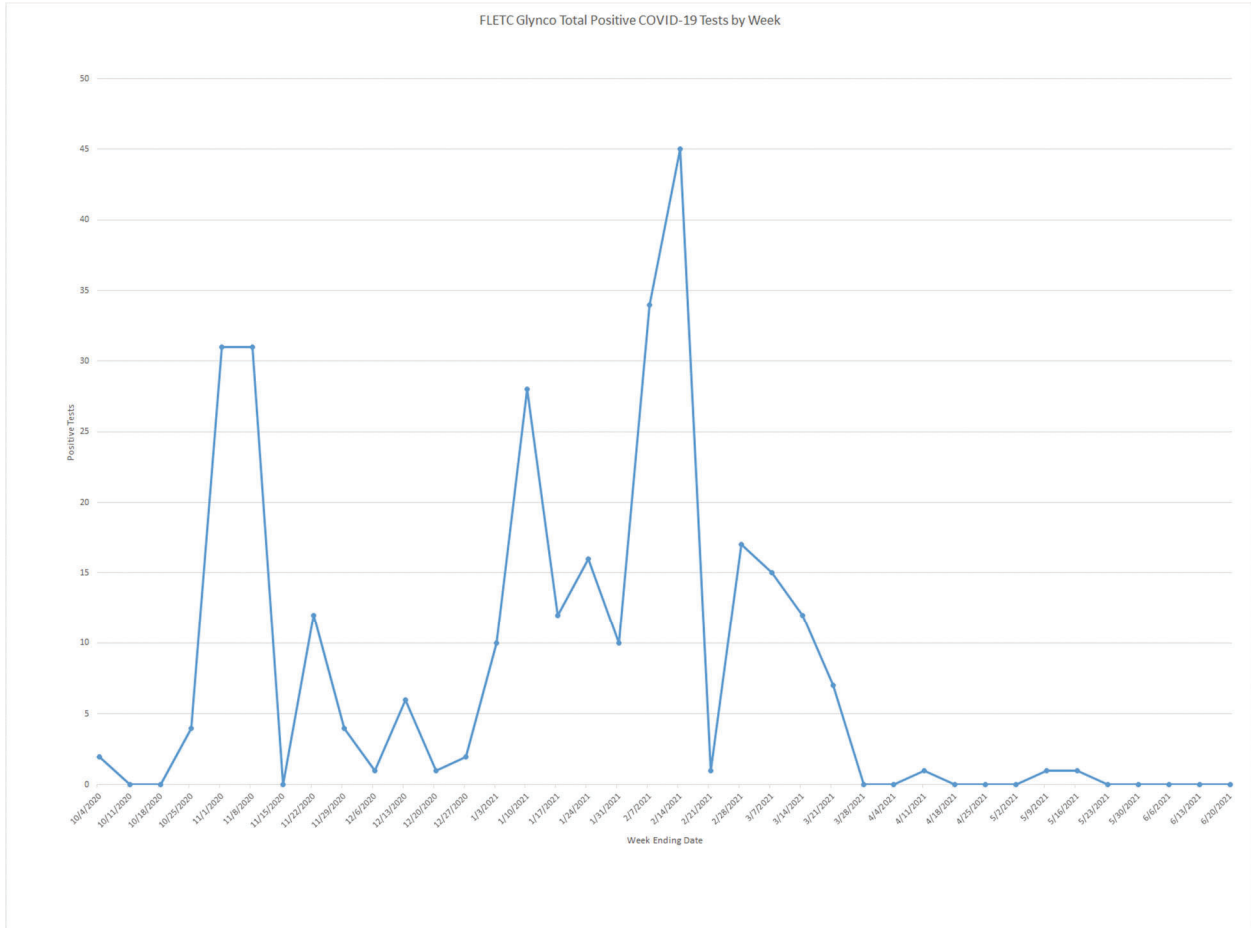
## Appendix B Photographs of Examples of Signage and Exposure Reducing Barriers



Source: DHS OIG selection of photos provided by FLETC



## Appendix C Glynco Training Facility Positive COVID-19 Tests by Week



Source: FLETC



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**Appendix D**  
**Photographs of the Two Buildings Used for ROM and Isolation**  
**Dormitories**



Source: DHS OIG selection of photos provided by FLETC



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**Appendix E**  
**Report Distribution**

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